

# Generic License Change Package Issues

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## 1. Inspection Intervals

### SG Exam Guideline Status

- NRC comments on prescriptive interval requirements received in September and are being addressed by the SGMP
- New draft of rev 6 of SG Exam Guidelines distributed to industry on 10/22/01
- Contains information presented to the staff in August
- Addresses approximately 700 industry and NRC comments
  - Data quality
  - Qualified techniques
  - Cycle length
- Comments on new draft requested by 12/18/01
- Draft provided to the NRC after current review

### Length

- Industry proposal for inspection interval controls includes a specific limit as a function of tubing material ("X/Y/Z")
- Industry documenting the basis for inspection intervals – expected completion by end of the year
- Will propose specific limits for the commitment after the basis is documented and industry comments are dispositioned

### Regulatory Controls

#### NRC proposal for inspection interval controls

- Summary:
  - Admin TS
    - Controls changes similar to the controls on Performance Criteria
  - Prescriptive interval lengths:
    - Maximum length of 2 RFO
    - Inspect at least one SG every time
- Concerns:
  - Does not specifically address improved materials and designs
  - No flexibility to incorporate new knowledge – implies NRC endorsement of Guideline inspection interval requirements
  - NRC approval process is excessively long

#### Industry proposal for inspection interval controls

- Summary
  - Licensee commitment to a maximum inspection interval
  - Licensee commitment to provide NRC a report establishing the basis for a longer inspection interval one year in advance of exceeding the committed interval

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## 3. Next Steps

### Industry actions:

- Submit SG Exam Guidelines, rev 6 to NRC
- Submit basis for longer inspection intervals to the NRC
- Submit specific inspection interval limits for licensee commitment in the GLCP
- Submit basis for application of 1.4 safety factor to NRC
- Submit revised GLCP to the NRC

### NRC Actions:

- Review industry proposal for SG cycle lengths
- Provide feedback on the application of the 1.4 safety factor

## 4. Meeting Planning

### SGTF / NRC Meeting

Date - ?

### Senior Management Meeting

Need - ?

Date – 11/20 PM, 11/28 AM ?

### ACRS Subcommittee Briefing – November 29<sup>th</sup>

Topics covered - ?

### NEI Licensing Information forum – November 27<sup>th</sup>

Topics covered - ?

### Commissioner briefing – December 3<sup>rd</sup>

Topics covered - ?

Industry support - ?