



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

June 2, 1998

Mr. Doug Walters
Nuclear Energy Institute
1776 I Street N.W.
Washington, DC 20006

SUBJECT: GUIDANCE ON ADDRESSING GSI-168 FOR LICENSE RENEWAL

Dear Mr. Walters:

Unresolved generic safety issues (GSIs) within the scope of aging management review or time-limited aging analyses are to be addressed in a license renewal application as stated by the Commission when the amended license renewal rule, 10 CFR Part 54, was issued (60 FR 22484). Recent Nuclear Regulatory Commission (NRC) staff guidance on evaluating GSIs was provided in a letter to NEI dated January 29, 1998. One GSI meeting the criteria for evaluation for license renewal is GSI-168, "Environmental Qualification of Electrical Equipment."

For license renewal, the Statements of Consideration (SOC) for the amended license renewal rule (60 FR 22484) state that resolution of a GSI generically is not necessary for the issuance of a renewed license. However, designation of an issue as a GSI does not exclude the issue from the scope of the aging management review or time-limited aging evaluation. The Commission went on to provide four approaches that could be used to satisfy the finding required by 10 CFR 54.29. These approaches have been incorporated into the industry's guidance document, NEI 95-10, "Industry Guideline for Implementing the Requirements of 10 CFR Part 54 -The License Renewal Rule," Revision 0, that the staff proposed to endorse in its Draft Regulatory Guide, DG-1047, "Standard Format and Content for Applications to Renew Nuclear Power Plant Operating Licenses."

With respect to addressing GSI-168 for license renewal, until completion of an ongoing research program and staff evaluations, the potential issues associated with GSI-168 and their scope have not been defined to the point that a license renewal applicant can reasonably be expected to address them at this time. Therefore, an acceptable approach described in the SOC is to provide a technical rationale demonstrating that the current licensing basis for EQ pursuant to 10 CFR 50.49 will be maintained in the period of extended operation. Although the SOC also indicates that an applicant should provide a brief description of one or more reasonable options that would be available to adequately manage the effects of aging, the staff does not expect an applicant to provide the options at this time. A renewal applicant should monitor updates to NUREG-0933, "A Prioritization of Generic Safety Issues," for revisions to GSI-168 during the review of its application and supplement its license renewal application if the issues associated with GSI-168 become defined such that providing the options or pursuing one of the other approaches described in the SOC becomes feasible. Guidance on supplementing a license renewal application after submittal to address GSIs is provided in the January 29, 1998, GSI letter.

Mr. D. Walters

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The guidance in this letter is provided for addressing GSI-168 in a license renewal application and is not intended to be applied in any other context. Additionally, this letter does not modify the requirements for a license renewal applicant to address EQ as a time-limited aging analysis in accordance with the requirements of 10 CFR 54.21(c) or to ensure continued compliance with 10 CFR 50.49 for the period of extended operation.

If there are any questions, please contact Steve Hoffman at 301-415-3245.

Sincerely,

A handwritten signature in black ink, appearing to read "C. I. Grimes".

Christopher I. Grimes, Director
License Reviewal Project Directorate
Division of Reactor Program Management
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Project No.: 690

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