

September 19, 2005

ORGANIZATION: Nuclear Energy Institute (NEI)

SUBJECT: SUMMARY OF LICENSE RENEWAL MEETING BETWEEN THE
U.S. NUCLEAR REGULATORY COMMISSION (NRC) STAFF AND NEI
LICENSE RENEWAL TASK FORCE

On July 21, 2005, the NEI License Renewal Task Force and other industry representatives met with the Nuclear Regulatory Commission (NRC) staff to discuss the assessment of the license renewal audit review process, generic license renewal topics, and license renewal process improvements. The meeting agenda is contained in Enclosure 1. Attendees at the meeting are listed in Enclosure 2. A summary of the discussions at the meeting follows:

Severe accidents mitigation alternatives guidance document

NEI 05-01, "Severe Accident Mitigation Alternatives (SAMA) Analysis Guidance Document," was provided to the NRC staff on April 8, 2005. The staff provided comments on the document to NEI on July 12, 2005. During the meeting on July 21, 2005, NEI provided feedback to the staff regarding the staff's comments. NEI indicated four areas that may represent differences of approach between NEI and NRC and may require more dialogue:

- Use of revisions to the plant probabilistic risk analysis developed since the SAMA analysis was performed
- Handling of external events
- Use of uncertainty analyses
- Addressing low cost alternatives identified by other applicants

Discussions indicated that the positions of NEI and the staff are not greatly different on these issues and can be resolved. NEI plans to revise the document to address the staff comments within approximately one month. An additional meeting, specifically to discuss SAMA, may be needed; NEI will inform the staff if such a meeting is necessary.

Assessment of the pilot audit review process

The NRC staff provided an overview of its self assessment of the improved safety review audit process, first implemented as a pilot on the Farley, Arkansas Unit 2, and Cook license renewal applications. The staff's presentation materials are contained in Enclosures 3 and 4. The results of the assessment and the staff's implementation plan are contained in a July 15, 2005, memorandum from P. T. Kuo to J. E. Dyer that is publicly available in ADAMS under (Accession No. ML051890122). The assessment determined that the improved process has been successful because it: (1) verifies the applicant's statements of consistency with GALL required for the staff's finding for renewal; (2) helps manage the increase in staff resources needed for the large number of applications under review while freeing headquarters staff to better focus on significant operating reactor issues; and (3) allows the staff and applicant to focus resources on those requests for additional information that are needed to support the staff's evaluation. It is expected that the combination of the improved review process and the revised license renewal guidance documents, to be issued in September 2005, should further enhance the effectiveness

and efficiency of the license renewal process. However, the assessment did identify additional improvements and the staff has developed an implementation plan which is attached to the referenced memorandum.

NEI indicated that the industry is pleased with the process and will provide the NRC with its assessment in the future. Discussions at the meeting included the need for applicants to provide quality applications and for the staff to ensure that its requests for additional information are focused and support the findings needed by the rule. The staff agreed to review its expectations regarding questions identified by the audit teams prior to going on-site and to ensure consistency amongst the audit teams. The staff also agreed to respond to NEI's request as to whether the audit report can be issued as draft and allow the applicant to provide comments.

Status of guidance document updates

Revision of the license renewal regulatory guide, standard review plan, and Generic Aging Lessons Learned (GALL) Report are on schedule to be issued by September 30, 2005. The NRC staff will also issue by the same date, a NUREG report documenting the resolution of the public comments and will issue approximately one month later, a NUREG report providing the bases for the changes made since the July 2001 version of the documents. In response to NEI's request, a copy of the staff's notes used to present the overview of the guidance document updates is provided as Enclosure 5. Also as requested by NEI, the latest versions of the updated guidance documents which were sent to the Advisory Committee on Reactor Safeguards (ACRS) are publicly available in ADAMS. The ACRS subsequently reviewed the documents at its September 9, 2005, meeting.

The staff is also considering developing a database to track exceptions to the GALL Report found acceptable during application reviews. The database would be used in a future revision of the guidance documents.

NRR work control process

Recent applications have had a high rate of consistency with the GALL Report and the staff is changing how it controls the review between that performed by the on-site audit teams and the headquarters staff. Recent applications have averaged approximately 90 percent consistency with GALL resulting in the majority of the aging management reviews being performed by the audit teams. Rather than continue to provide the complete application to the headquarters technical staff to perform their limited reviews, the license renewal project manager now prepares a discreet work package defining the work for each review to be performed by the headquarters staff. Enclosure 6 provides the presentation materials used at the meeting to describe the work package process.

Interim staff guidance process and issue resolution process

NEI, in its February 18, 2005, letter to the NRC (Accession No. ML050590202), proposed eliminating the interim staff guidance process (ISG) that has been in use since the 2001 update of the license renewal guidance documents. A new issue resolution process was proposed by NEI in conjunction with the NRC staff using the NRC's formal generic communication process for issuing license renewal guidance between updates of the guidance documents. The staff responded that the ISG process was established as a way to quickly disseminate lessons learned

from application reviews so that they can be used by current applicants and licensees in the process of preparing future renewal applications. NEI is concerned that by the time an ISG is issued for public comment, the staff has established its position with little opportunity for industry involvement. Contributing to the problem may be that the number of meetings on generic topics have declined recently, partly due to the success of the program. The early communication that occurred in the past on ISGs under development is not always occurring. With the establishment of monthly telephone calls and quarterly meetings discussed under the topic "Communication" below, NEI and the public should have more information on ISGs being considered and opportunity for earlier involvement. There will be further discussions between NEI and the staff as to whether improved communications will resolve the industry's concern with the ISG process or whether it will be eliminated and replaced by use of formal generic communications.

Use of on-site scoping and screening reviews

The NRC staff and industry agree that use of the on-site audit process for aging management reviews has been beneficial. NEI has requested that the staff consider use of the on-site audit process for the scoping and screening reviews also. The staff is considering this request but indicated that to ensure consistency in the reviews, guidance would need to be developed for the audit teams. The staff has begun initial development of a document that would provide scoping and screening guidance by reactor type and as applicable, class of reactors. Enclosure 7 provides an example of the type of information being compiled. The staff asked the industry if it believed that it would be worthwhile to spend the resources needed to develop the document over the next one to two years to support the audit process, considering that approximately 50 percent of the reactors have either received or are under review for license renewal. After discussion, NEI agreed that the industry would develop its position on whether development of the scoping and screening guidance document would be beneficial.

Communication

To improve communications, the NRC staff and NEI will conduct quarterly meetings (either staff level or management as needed) and monthly telephone conferences in the months when there is not a meeting. All meetings or telephone conferences will be noticed and open to participation by any member of the public that is interested.

NEI February 18, 2005, letter topics

The following topics contained in NEI's February 18, 2005, letter (Accession No. ML050590202), were discussed:

- Credit regulatory process for resolution of current issues and the requirement for future submittal of aging management programs

NEI stated that in some cases the NRC staff reviews current issues as if resolution under the existing regulatory process will not be adequate for license renewal. The statements of consideration for the license renewal rule (10 CFR Part 54) acknowledges that current generic issues need not be resolved for a renewed license and gives the applicant three options for addressing the concern until the generic issue is resolved. For issues affecting activities within the scope of license renewal, the staff must have regulatory assurance before issuing

the renewed license that the applicant will address the issue in the future. The renewed licenses have, for some issues, required the licensee to submit its resolution of the generic issue for staff approval two years prior to the period of extended operation. NEI questioned the need for a second review if the staff has reviewed the licensee's actions as part of the generic resolution. The staff agreed to review NEI's concern and the requirements it imposes on renewed licenses.

- Quality of renewal applications

The importance of applicants submitting complete high quality applications was emphasized which facilitates the reviews and reduce costs.

- Concurrent major licensing actions with license renewal

License renewal is based on issuing a renewed license for an established current licensing basis (CLB). Major licensing actions that affect the CLB, such as extended power uprates, modify the CLB and impact the ability to complete the license renewal review. Applicants were cautioned about attempting major parallel licensing actions that affect the CLB that may not be completed on a schedule consistent with the license renewal review.

- License renewal tutorial

To assist in orienting new NRC staff to the license renewal process, an Introduction to License Renewal Tutorial was developed. Enclosure 8 was used to demonstrate the contents and use of the tutorial. The tutorial provides an overview of the license renewal process and is available through the NRC's Web site at <http://www.nrc.gov> for use also by the industry and public. The tutorial is divided into seven sections, with outlined summaries and links to additional information. A safety review, in the form of an exam, is available at the end of the sections.

Future activities

Monthly telephone conferences will be scheduled and the next meeting will be in October 2005.

/RA/

Stephen T. Hoffman, Senior Project Manager
License Renewal Section B
License Renewal and Environmental Impacts Program
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Project No. 690

Enclosures: As stated

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AGENDA
 LICENSE RENEWAL MEETING*
 BETWEEN THE NRC STAFF AND NEI
 JULY 21, 2005

- | | | | |
|-----|---|----------------------|--------------------|
| 1. | Introduction | NRC/NEI ¹ | 8:30 - 8:45 a.m. |
| 2. | Severe Accidents Mitigation Alternatives (SAMA) guidance document | NEI/NRC | 8:45 - 9:45 a.m. |
| 3. | Assessment of the pilot audit review process | NRC/NEI | 9:45 - 11:00 a.m. |
| 4. | Break | | 11:00 - 11:15 a.m. |
| 5. | Status of guidance document updates | NRC | 11:15 - 11:30 a.m. |
| 6. | NRR work control process | NRC | 11:30 - 11:45 a.m. |
| 7. | Interim staff guidance process and issue resolution process | NEI/NRC | 11:45 - 12:15 p.m. |
| 8. | Use of on-site scoping and screening reviews | NEI/NRC | 12:15 - 12:30 p.m. |
| 9. | Lunch | | 12:30 - 1:30 p.m. |
| 10. | Communication | NEI/NRC | 1:30 - 2:30 p.m. |
| 11. | NEI February 18, 2005, letter topics | NEI/NRC | 2:30 - 3:45 p.m. |
| | a. Credit for existing programs | | |
| | b. Credit regulatory process for resolution of current issues | | |
| | c. Quality of renewal applications | | |
| | d. Requirement for future submittal of aging management programs | | |
| | e. Concurrent major licensing actions with license renewal | | |
| 12. | Future activities | NRC/NEI | 3:45 - 3:55 p.m. |
| 13. | Closing | NRC | 3:55 - 4:00 p.m. |

¹The first organization listed lead the discussion.

Enclosure

*The public is invited to participate throughout the meeting on topics of interest.

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Dated: September 19, 2005

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JULY 21, 2005

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NRC STAFF AND THE NUCLEAR ENERGY INSTITUTE
JULY 21, 2005**

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Overview of NPP License Renewal Guidance Documents Revised or Written – September 30, 2005

SUMMARY

In July 2001, the Nuclear Regulatory Commission (NRC) issued the nuclear power plant (NPP) license renewal guidance (LRG) documents: NUREG-1800, "Standard Review Plan for the Review of License Renewal Applications for Nuclear Power Plants" (SRP-LR); and NUREG-1801, "Generic Aging Lessons Learned (GALL) Report." Since that time, the reactor license renewal process has produced considerable experience, with operating licenses for 33 reactors already renewed and applications for 16 additional reactors under review. The staff used the experience gained from past and current reviews to update the LRG documents to further improve the efficiency and effectiveness of the process. The LRG documents published in July 2001 for safety reviews have been revised to incorporate lessons learned from the review of these license renewal applications. Changes to the SRP-LR and the GALL Report fall into the following categories: technically-verified staff positions previously approved in other documents, such as safety evaluation reports and interim staff guidance (ISG); roll-up changes; operating experience, and technical or process clarifications or corrections. The draft versions of the SRP-LR and the GALL Report were issued for public comment on February 1, 2005 (70 FR 5254) and the regulatory guide (RG) and NEI 95-10 on February 2, 2005 (70 FR 5494). The staff assessment of public comments is being issued as NUREG-1832, "Analysis of Public Comments on the Revised License Renewal Guidance Documents," dated September 30, 2005. The justification for technical changes to the SRP-LR and GALL Report from their initial publication in 2001 is contained in NUREG-1833, "Technical Bases for Revision to the License Renewal Guidance Documents," dated October 31, 2005. Regulatory Guide 1.188, Revision 1, endorses NEI 95-10, Revision 6, "Industry Guideline for Implementing the Requirements of 10 CFR Part 54 - The License Renewal Rule," which the Nuclear Energy Institute (NEI) published in June 2005. Changes to the RG which endorses NEI 95-10 include approved ISGs and experience gained from license renewal application reviews.

NUREG-1800, Revision 1, Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants

The NRC staff revised the July 2001 version of NUREG-1800, "Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants" (SRP-LR). The SRP-LR provides guidance to NRC staff reviewers in performing safety reviews of applications to renew licenses of nuclear power plants in accordance with the license renewal rule. The SRP-LR is revised to incorporate lessons learned from the review of a number of previous license renewal applications, as well as to make changes corresponding to the update of the GALL Report. Revision 1 of the SRP-LR is available in ADAMS under Accession No. ML052150045.

NUREG-1801, Revision 1, Generic Aging Lessons Learned Report

The Generic Aging Lessons Learned (GALL) Report, Revision 1, is an update to the July 2001 version; the report format is largely unchanged. The GALL Report is a technical basis document for the SRP-LR and should be treated in the same manner as an approved topical report that is applicable generically. It catalogs plant structures and components; lists the materials, environments, aging effects and mechanisms; a new Chapter IX was added to the GALL Report to clarify the use of standardized terminology for these parameters. The license renewal review process pointed out crucial issues in Aging Management Programs (AMPs); the

revised GALL Report incorporates changes to AMPs (9 new AMPs and nearly all of original 48 revised) to reflect the latest NRC staff positions. This is an ongoing process and as new information is developed the NRC will update (or issue) ISGs, update the GALL Report, or update the SRP-LR, as appropriate. The GALL Report Volumes 1 and 2, Revision 1, are available in ADAMS under Accession Nos. ML052150052 and ML052150072, respectively.

NUREG-1832, Analysis of Public Comments on the Revised License Renewal Guidance Documents

On February 1, 2005, the NRC announced (70 FR 5254) the issuance for public comment and availability of the revised SRP-LR and the revised GALL Report. The NRC also announced a public workshop that was held on March 2, 2005, to facilitate gathering public comment on the draft revised documents. NUREG-1832 contains the NRC response to subsequent stakeholders' comments. The dispositions are prepared in a table format and contained in five Appendices. Appendix A addresses the specific written comments submitted by NEI; Appendix B addresses the comments from the Advisory Committee on Reactor (ACRS); Appendix C addresses the participant comments from the license renewal public workshop on March 2, 2005; Appendix D addresses the written comments submitted by other public stakeholders, and Appendix E provides a comparison of the aging management review line-items from the January 2005 GALL Report to the September 2005 GALL Report (listing line-by-line changes during the public comment process). NUREG-1832 is available in ADAMS under Accession No. ML052150077.

NUREG-1833, Technical Bases for Revision to the License Renewal Guidance Documents

The NRC staff wrote NUREG-1833 to document and justify the technical changes to the SRP-LR and the GALL Report since the 2001 publication, as reflected in NUREG-1800, Revision 1 and NUREG-1801, Revision 1. The changes that were made when revising these license renewal guidance documents are captured in NUREG-1833, along with the basis for technical changes. Changes to the GALL Report and SRP-LR fall into the following categories: (1) roll-up changes, (2) technically-verified staff positions previously approved in other documents, such as safety evaluation reports (SERs) and approved ISGs, (3) operating experience, and (4) technical or process clarifications and corrections. NUREG-1833 is available in ADAMS under Accession No. ML052110003.

Regulatory Guide (RG) 1.188, Revision 1, Standard Format and Content for Applications to Renew Nuclear Power Plant Operating Licenses

The issuance of renewed operating licenses for nuclear power plants is governed by Title 10 of the *Code of Federal Regulations* Part 54 (10 CFR Part 54), "Requirements for Renewal of Operating Licenses for Nuclear Power Plants" (commonly known as the 'License Renewal Rule'). As such, 10 CFR Part 54 specifies the information that a nuclear power plant licensee must include as part of an application to renew an operating license issued by the NRC. The RG 1.188 endorses NEI 95-10, Revision 6, "Industry Guideline for Implementing the Requirements of 10 CFR Part 54 - The License Renewal Rule," which the Nuclear Energy Institute (NEI) published in June 2005. This spells out in detail how the application should include: (1) general information, (2) an integrated plant assessment (IPA), (3) an evaluation of

time-limited aging analyses (TLAAs), (4) a supplement to the plant's final safety analysis report (FSAR), (5) any necessary changes to the plant's technical specifications (along with related justifications), and (6) a supplement to the plant's environmental report. Revision 1 of RG 1.188 is available in ADAMS under Accession No. ML052200165.