

August 2, 2007

Mr. James H. Riley
Nuclear Energy Institute
1776 I Street, NW, Suite 400
Washington, DC 20006-3708

SUBJECT: FINAL LICENSE RENEWAL INTERIM STAFF GUIDANCE
LR-ISG-2006-03: STAFF GUIDANCE FOR PREPARING SEVERE ACCIDENT
MITIGATION ALTERNATIVES ANALYSES

Dear Mr. Riley:

By letter dated August 10, 2006, we issued our proposed License Renewal Interim Staff Guidance, LR-ISG-2006-03, for public comments. By letter dated September 15, 2006, Dr. Jill Lipoti, State of New Jersey, Department of Environmental Protection, provided comments and requested that the staff take this opportunity to include a review of the impacts of terrorist attacks on nuclear facilities as part of the National Environmental Policy Act in the interim staff guidance. The staff reviewed Dr. Lipoti's comments and provided responses in a letter dated July 31, 2007, which can be found in the Agencywide Document Access and Management System (ADAMS) under Accession Number ML071380307. No changes were incorporated in the Final LR-ISG-2006-03 based on these comments.

Enclosure 1 is our Final LR-ISG-2006-03. A notice relating to this Final LR-ISG will be published in the *Federal Register*. If you have any questions regarding this matter, please contact Mr. Richard L. Emch, Jr., by telephone at 301-415-1590 or by e-mail at RLE@nrc.gov.

An identical letter was sent to Mr. David Lochbaum at the Union of Concerned Scientists.

Sincerely,

/RA/

Pao-Tsin Kuo, Director
Division of License Renewal
Office of Nuclear Reactor Regulation

Project No. 690

Enclosure:
Final LR-ISG-2006-03

cc w/encl: See next page

August 2, 2007

Mr. David Lochbaum
Union of Concerned Scientists
1707 H Street, NW, Suite 600
Washington, DC 20006-3919

SUBJECT: FINAL LICENSE RENEWAL INTERIM STAFF GUIDANCE
LR-ISG-2006-03: STAFF GUIDANCE FOR PREPARING SEVERE ACCIDENT
MITIGATION ALTERNATIVES ANALYSES

Dear Mr. Lochbaum:

By letter dated August 10, 2006, we issued our proposed License Renewal Interim Staff Guidance, LR-ISG-2006-03, for public comments. By letter dated September 15, 2006, Dr. Jill Lipoti, State of New Jersey, Department of Environmental Protection, provided comments and requested that the staff take this opportunity to include a review of the impacts of terrorist attacks on nuclear facilities as part of the National Environmental Policy Act in the interim staff guidance. The staff reviewed Dr. Lipoti's comments and provided responses in a letter dated July 31, 2007, which can be found in the Agencywide Document Access and Management System (ADAMS) under Accession Number ML071380307. No changes were incorporated in the Final LR-ISG-2006-03 based on these comments.

Enclosure 1 is our Final LR-ISG-2006-03. A notice relating to this Final LR-ISG will be published in the *Federal Register*. If you have any questions regarding this matter, please contact Mr. Richard L. Emch, Jr., by telephone at 301-415-1590 or by e-mail at RLE@nrc.gov.

An identical letter was sent to Mr. James H. Riley at the Nuclear Energy Institute.

Sincerely,

/RA/

Pao-Tsin Kuo, Director
Division of License Renewal
Office of Nuclear Reactor Regulation

Project No. 690

Enclosure:
Final LR-ISG-2006-03

cc w/encl: See next page

August 2, 2007

Mr. James H. Riley
Nuclear Energy Institute
1776 I Street, NW, Suite 400
Washington, DC 20006-3708

SUBJECT: FINAL LICENSE RENEWAL INTERIM STAFF GUIDANCE
LR-ISG-2006-03: STAFF GUIDANCE FOR PREPARING SEVERE ACCIDENT
MITIGATION ALTERNATIVES ANALYSES

Dear Mr. Riley:

By letter dated August 10, 2006, we issued our proposed License Renewal Interim Staff Guidance, LR-ISG-2006-03, for public comments. By letter dated September 15, 2006, Dr. Jill Lipoti, State of New Jersey, Department of Environmental Protection, provided comments and requested that the staff take this opportunity to include a review of the impacts of terrorist attacks on nuclear facilities as part of the National Environmental Policy Act in the interim staff guidance. The staff reviewed Dr. Lipoti's comments and provided responses in a letter dated July 31, 2007, which can be found in the Agencywide Document Access and Management System (ADAMS) under Accession Number ML071380307. No changes were incorporated in the Final LR-ISG-2006-03 based on these comments.

Enclosure 1 is our Final LR-ISG-2006-03. A notice relating to this Final LR-ISG will be published in the *Federal Register*. If you have any questions regarding this matter, please contact Mr. Richard L. Emch, Jr., by telephone at 301-415-1590 or by e-mail at RLE@nrc.gov.

An identical letter was sent to Mr. David Lochbaum at the Union of Concerned Scientists.

Sincerely,
/RA/

Pao-Tsin Kuo, Director
Division of License Renewal
Office of Nuclear Reactor Regulation

Project No. 690

Enclosure:
Final LR-ISG-2006-03

cc w/encl: See next page

DISTRIBUTION: See next page
Adams Accession No. **ML071640133**

OFFICE	PM:DLR:REBB	LA:DLR	PM:DLR:RLRB	OGC
NAME	REmch	YEdmonds	LTran	SUttal (NLO w/ comments)
DATE	06/15/07	06/26/07	07/3/07	07/13/07
OFFICE	BC:DLR:REBB	BC:DLR:RRLRB	D:DLR	
NAME	RFranovich	RAuluck	PTKuo	
DATE	07/23/07	07/27/07	08/2/07	

OFFICIAL RECORD COPY

Letter to: James H. Riley, David Lochbaum, from: Pao-Tsin Kuo, dated: August 2, 2007

SUBJECT: FINAL LICENSE RENEWAL INTERIM STAFF GUIDANCE
LR-ISG-2006-03: STAFF GUIDANCE FOR PREPARING SEVERE ACCIDENT
MITIGATION ALTERNATIVES ANALYSES

HARD COPY

DLR RF
REmch
LTran

E-MAIL:

PUBLIC
MRubin
RPalla
RidsNrrOd
RidsNrrAdro
RidsNrrAdra
RidsNrrAdes
RidsNrrDlr
RidsNrrDra
RidsNrrDnrl
RidsNrrDlrRebb
RidsNrrDlrReba
DLR Staff

FINAL LICENSE RENEWAL INTERIM STAFF GUIDANCE LR-ISG-2006-03:
STAFF GUIDANCE FOR PREPARING SEVERE ACCIDENT MITIGATION
ALTERNATIVES ANALYSES

Introduction

A Severe Accident Mitigation Alternatives (SAMA) analysis is required as part of a license renewal application, if a SAMA analysis has not already been performed for the plant and reviewed by the NRC staff. SAMA analyses have been performed and submitted to the NRC for all applications for license renewal received by the staff thus far. Therefore, this LR-ISG is being recommended as guidance consistent with our goal to more effectively and efficiently resolve license renewal issues identified by the staff or the industry.

Background and Discussion

After receiving extensive requests for additional information regarding the SAMA analyses, several applicants for license renewal concluded that they did not fully understand the kind of information that the NRC staff was expecting to see in SAMA analyses.

The Nuclear Energy Institute (NEI) developed a generic guidance document to help clarify the NRC staff's expectations regarding the information that should be submitted in SAMA analyses. On April 8, 2005, NEI submitted NEI 05-01, "Severe Accident Mitigation Alternatives (SAMA) Analysis - Guidance Document." The NRC staff reviewed this guidance document, and by letter, dated July 12, 2005, provided comments on NEI 05-01. The NRC staff's comments were discussed during a public meeting between NEI and NRC on July 21, 2005.

On February 17, 2006, NEI submitted its NEI 05-01, Revision A, dated November 2005. The NRC staff reviewed and concluded that this version fully resolved the NRC staff's comments. In addition, the NRC staff concluded that NEI 05-01, Revision A, describes existing NRC regulations and facilitates complete preparation of SAMA analysis submittals.

Some applicants for license renewal have submitted SAMA analyses using the guidance provided in NEI 05-01, Revision A. The NRC staff found improved quality in the submitted SAMA analyses and a reduction in the number of requests for additional information for those applications that followed the guidance provided in NEI 05-01, Revision A.

Recommended Action

The staff is recommending that applicants for license renewal follow the guidance provided in NEI 05-01, Revision A, when preparing their SAMA analyses. The staff finds that NEI 05-01, Revision A, describes existing NRC regulations, and facilitates complete preparation of SAMA analysis submittals.

Although this final LR-ISG does not convey a change in the NRC's regulations or how they are interpreted, it is being provided to facilitate complete preparation of future SAMA analysis submittals in support of applications for license renewal. The NRC staff plans to incorporate the guidance provided in NEI 05-01, Revision A, into a future update of Supplement 1 to Regulatory Guide 4.2, "Preparation of Supplemental Environmental Reports for Applications to

Enclosure

Renew Nuclear Power Plant Operating Licenses.” This LR-ISG provides a clarification of existing guidance with no additional requirements. For those that are interested in reviewing NEI 05-01, Revision A, the Agencywide Documents Access and Management System (ADAMS) Accession Number is ML060530203.

Nuclear Energy Institute

Project No. 690

cc:

Ms. Christine S. Salembier, Commissioner
State Liaison Officer
Department of Public Service
112 State St., Drawer 20
Montpelier, VT 05620-2601

Mr. Gordon A. Cleffton
Nuclear Energy Institute
1776 I St., N.W., Suite 400
Washington, DC 20006-3708

Mr. Frederick W. Polaski
Manager License Renewal
Exelon Corporation
200 Exelon Way
Kennett Square, PA 19348

Mr. Clifford I. Custer
Project Manager, License Renewal
FirstEnergy Nuclear Operating Company
P.O. Box 4
Route 168 (Mail Stop SIM-2)
Shippingport, PA 15077

Mr. Paul Gunter, Director
Reactor Watchdog Project
Nuclear Information & Resource Service
6930 Carroll Avenue, Suite 340
Takoma Park, MD 20912

Mr. Hugh Jackson
Public Citizen's Critical Mass Energy &
Environment Program
215 Pennsylvania Ave., SE
Washington, DC 20003

Mary Olson
Nuclear Information & Resource Service
Southeast Office
P.O. Box 7586
Asheville, NC 28802

Mr. Garry G. Young
Manager, License Renewal Services
1448 SR 333, N-GSB-45
Russellville, AR 72802

Robert A. Vincent
Licensing Lead - License Renewal Project
Palisades Nuclear Plant
27780 Blue Star Memorial Highway
Covert, MI 49043

Lorrie Bell, Project Manager
Wolf Creek Nuclear Operating Corporation
P.O. Box 411
Burlington, KS 66839

Roger Stewart
Progress Energy Carolinas, Inc.
3581 West Entrance Road
RNP A9
Hartsville, SC 29550

Michael H. Crowthers, Supervisor Nuclear
Regulatory Affairs
PPL Susquehanna, LLC
Two North Ninth Street (GENPL4)
Allentown, PA 18101-1179