

August 20, 2007

ORGANIZATION: Nuclear Energy Institute

SUBJECT: SUMMARY OF THE LICENSE RENEWAL MEETING HELD BETWEEN
THE U.S. NUCLEAR REGULATORY COMMISSION STAFF AND THE
NUCLEAR ENERGY INSTITUTE

The U.S. Nuclear Regulatory Commission (NRC) staff and the Nuclear Energy Institute (NEI) License Renewal Task Force met on June 21, 2007, to discuss generic license renewal topics, lessons learned from the audit process, and license renewal process improvements. Enclosure 1 provides a listing of the meeting participants and Enclosure 2 contains the meeting agenda. A summary of the discussions follows:

1. Environmental topics from the May 31, 2007, meeting

a. NRC requests for additional information on Category I impacts

The NRC staff indicated that it had discussed with the NRC's Office of the General Counsel (OGC) the issue of whether or not questions about Category 1 items are warranted during license renewal environmental reviews. According to OGC, the staff could adopt a Category I conclusion for an issue at a specific site if the Generic Environmental Impact Statement for License Renewal (GEIS) identifies the specific plant sites to which each generic determination applies, provided that no new and significant information calls into question the generic conclusions in the GEIS. Absent a listing of issues for each site, OGC indicated that the staff would require descriptive information about plant and site characteristics to confirm that the GEIS analysis applies to a specific site and to disclose this descriptive information in a site-specific supplement to the GEIS. The staff did not have an opportunity to determine if the GEIS included such a listing before the NEI meeting, but indicated that it would do so before the next NEI public telephone conference.

b. Clarification of non-GEIS or regulatory issues

NEI was not prepared to discuss specific examples involving non-Category I items at this meeting. The Shearon Harris Nuclear Power Plant audit went well and this topic is not considered an urgent issue. NEI will discuss this topic in a future meeting.

c. GEIS update status

The NRC staff plans to issue the draft GEIS and proposed rule revision for public comment in the first calendar quarter of 2009. This proposed schedule, an extension of the original schedule because of the Fiscal Year 2007 budget continuing resolution, still requires Commission approval.

2. Severe accident mitigation alternative (SAMA) analyses: Information regarding use of output from SECPOP2000 code as input to MACCS2 code

The MACCS2 code, used to quantify the economic impacts of a severe accident (and SAMA benefits), requires site-specific economic input data, e.g., land values and farm related information at a county level. The necessary data file may be constructed by the analyst, or developed using a code such as the SECPOP2000 code, developed by Sandia National Laboratory. A problem with the SECPOP2000 code was recently brought to the staff's attention by one renewal applicant, although other analysts may have known about and worked around the problem previously. Specifically, the SECPOP2000 code writes the economic output data in a different format than required by the MACCS2 code. One or more columns of data are shifted by several characters, such that the values read by the MACCS2 code are incorrect. The parameters affected are believed to have only a second order effect on results. Therefore, the results of the SAMA analysis are unlikely to change. A knowledgeable analyst can work around the problem by reformatting the file written by SECPOP2000 to be compatible with the MACCS2 input file requirements. This problem would only affect SAMA analyses (for license renewal) and severe accident mitigation design alternatives analyses (for new reactor licensing) that rely on the use of the SECPOP2000 code for economic input parameters, and that were performed by analysts who were not aware of this code problem. Staff at Sandia responsible for the SECPOP2000 code have been informed of the problem.

3. Time-limited aging analysis (TLAA) and metal fatigue follow-up discussions from May 24, 2007, meeting

In the May 24, 2007, meeting with NEI, the staff had discussed the recent audit finding in which an applicant had inappropriately projected transient cycles for 60 years operation based on past operating history when the plant was operating in a favorable condition. As a result, the projected cycles were significantly reduced for the design transients, in some cases even down to zero. The applicant then used the projected cycles to compute the components' cumulative usage factors. The staff reiterated that this kind approach was unacceptable for evaluating the TLAA for associated components in accordance with 10 CFR 54.21(c)(1). The staff clarified that projecting the numbers of transient cycles in the application does not provide the applicant authorization to change the current design bases. If the applicant opts to change the current design bases, the request for change has to be processed following the process stipulated in 10 CFR 50.

The staff also discussed the need to review the benchmarking of the transfer function used in the stress-based fatigue analysis. During the recent audits, the staff asked the two applicants who used two different on-line fatigue monitoring softwares to demonstrate their stress benchmarks.

4. Post-approval renewal inspection procedure (IP-71003)

The NRC staff plans to send NEI the draft revision of IP-71003 by the end of August 2007. Once NEI has time to review the draft, a public meeting will be scheduled to discuss the revision and the NRC's plans for post-approval renewal inspections. A topic NEI was requested to discuss at the meeting is how licensees are managing their outstanding

commitments that need to be completed before entering the period of extended operation. NEI responded that normally licensees control the commitments using their existing commitment management process and that they will have the appropriate people at the meeting to discuss this topic.

5. License renewal interim staff guidance (LR-ISG) status

The NRC staff plans to issue for public comment by the end of August 2007 the updated LR-ISG process and the LR-ISG on Generic Aging Lessons Learned (GALL) Report, aging management program (AMP) XI.E6.

6. Lessons learned from recent safety review audits

For new AMPs that are consistent with the GALL Report (NUREG-1801), the license standard review plant (NUREG-1800) AMPs, indicates that the renewal application only needs a statement that the applicant's AMP is consistent with the GALL Report program. However, for these new programs, the staff does not have any detail to review during the audit. The staff proposed that applicants provide the same information for these new AMPs consistent with GALL as they would for a plant-specific AMP. If the details of the final AMP have not been developed yet, the applicant could describe options it could take for the AMP without having to indicate which approach would be selected. These descriptions would provide the staff with information on which to base its safety finding. It was agreed that the staff needs to provide guidance to the industry on what is needed for new AMPs that are consistent with the GALL Report.

7. New issues

NEI indicated that the NRC staff's expectations regarding scoping for recovery from station blackout has changed for recent applications since the staff issued LR-ISG-02, "Staff Guidance on Scoping of Equipment Relied on to Meet the Requirements of the Station Blackout (SBO) Rule (10 CFR 50.63) for License Renewal (10 CFR 54(a)(3))," dated April 1, 2002 (ADAMS Accession No. ML020920464). The staff disagrees. However, because the staff did not expect to discuss this topic during this meeting, the appropriate technical staff were not at the meeting. The staff will ensure that the appropriate staff are available at the next monthly call to discuss this topic.

One applicant previously provided the NRC staff with password protected, read-only access to its online database of onsite documents supporting its license renewal application. This facilitated the staff's preparation for the on-site audit. In response to NEI's request, the staff will investigate whether other applicants can provide the staff with the same access.

The staff is investigating whether cable tie wraps are credited for performing an intended function in accordance with a plant's current licensing basis that would require them to be within the scope of license renewal. The staff needs to complete its evaluation and will discuss this topic in a future conference call or meeting.

Potential topics discussed for future LR-ISGs are cracking of boiling water reactor top guides, cycle projections for fatigue analyses, and information requirements for Category 1 environmental impacts.

8. Public participation

A member of the public provided suggestions on areas of the GEIS for staff review in addressing Agenda Item 1.a.

/RA/

Stephen T. Hoffman, Senior Project Manager
License Renewal Branch B
Division of License Renewal
Office of Nuclear Reactor Regulation

Project No. 690

Enclosures:
As stated

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Stephen T. Hoffman, Senior Project Manager
License Renewal Branch B
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Office of Nuclear Reactor Regulation

Project No. 690

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OFFICE	PM:RLRB:DLR	LA:DLR	BC:RLRC:DLR	BC:REBB:DLR	BC:RLRB:DLR
NAME	SHoffman	IKing	KChang	RFranovich	RAuluck
DATE	08/20/07	08/02/07	08/17/07	08/06/07	08/13/07

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List of Participants
License Renewal Meeting Between the NRC Staff
and the Nuclear Energy Institute
June 21, 2007

PARTICIPANTS

1. Pao-Tsin (P. T.) Kuo
2. Kenneth Chang
3. Rani Franovich
4. Eric Benner
5. Stephen Hoffman
6. K. Robert Hsu
7. Bob Palla
8. Yeon-Ki Chung
9. Duc Nguyen
10. Linh Tran
11. Peter Wen
12. Roy Matthew
13. Jill Caverly
14. Veronica Rodriguez
15. Christian Jacobs
16. Andrew Stuyvenberg
17. Bo Pham
18. Alicia Williamson
19. Samuel Hernandez
20. Jessie Muir
21. Gordon Cleifton
22. James Ross
23. Julie Keys
24. Dave Flyte
25. Dave Kunsemiller
26. Cliff Custer
27. Garry Young
28. Alan Cox
29. Mark Giles
30. Bob Vincent
31. Fred Polaski
32. Richard Schallen
33. Eric Blocher
34. Chalmer Myer
35. Mike McFarlane
36. Ken Putnam
37. Gene Eckholt
38. Michael Heath
39. David Bremer
40. Ken Brune
41. Massoud Tefezoli

AFFILIATIONS

- U.S. Nuclear Regulatory Commission (NRC)
NRC
NRC
NRC
NRC
NRC
NRC
NRC
NRC
NRC
NRC
NRC
NRC
NRC
NRC
NRC
NRC
NRC
NRC
Nuclear Energy Institute (NEI)
NEI
NEI
PPL Susquehanna
FENOC/Beaver Valley
FENOC
Entergy
Entergy
Entergy
Entergy/Palisades
Exelon
Strategic Teaming and Resource Sharing (STARS)
STARS
Southern Nuclear Company
Southern Nuclear Company
FPL
NMC/Prairie Island
Progress Energy
NPPD/Cooper
TVA
AREVA

- | | | |
|-----|----------------|----------------------|
| 42. | Kathryn Sutton | Morgan Lewis |
| 43. | Gary Stevens | Structural Integrity |
| 44. | Fiona Wang | Taiwan Power Company |
| 45. | L. H. Wang | ITRI, Taiwan |
| 46. | Jin-Yaw Liu | ITRI, Taiwan |
| 47. | R. Alice Hwang | ATL |
| 48. | Jon Cudworth | Tetra Tech |

Agenda
License Renewal Meeting Between the
U.S. NRC Staff and the Nuclear Energy Institute Meeting
June 21, 2007

<u>Topic</u>	<u>Lead</u>
1. Environmental topics from May 31, 2007, meeting	
a. NRC requests for additional information on Category I impacts	NRC
b. Clarification of non-GEIS or regulatory issues	NEI
c. Generic Environmental Impact Statement update status	NRC
2. SAMA analyses: Information regarding use of output from SECPOP2000 code as input to MACCS2 code	NRC
3. Time-limited aging analysis and metal fatigue follow-up discussions from May 24, 2007, meeting	NRC
4. Post-approval renewal inspection procedure (IP-71003)	NRC
5. Interim staff guidance (ISG)	
a. Updated ISG process	NRC
b. ISG on aging management program XI.E6	NRC
6. Lessons learned from recent safety review audits	NRC/NEI
7. New issues	NRC/NEI
8. Public participation	All

Letter to Nuclear Energy Institute, from Stephen Hoffman, dated August 20, 2007

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SDuraiswamy

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RidsNrrDlrRlrc

RidsNrrDlrReba

RidsNrrDlrRebb

RidsNrrDci

RidsNrrDra

RidsNrrDe

RidsNrrDeEemb

RidsNrrDeEeeb

RidsNrrDss

RidsOgcMailCenter

RidsNrrAdes

MModes, RI

CJulian, RII

LKozak

RPalla

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

Ms. Julie Keys
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