

August 28, 2007

ORGANIZATION: Nuclear Energy Institute

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

The U.S. Nuclear Regulatory Commission (NRC) staff and the Nuclear Energy Institute (NEI) License Renewal Task Force held a public telephone conference call and meeting on July 25, 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 conference call participants. Enclosure 2 contains the agenda for the conference call. A summary of the discussions follows:

1. Environmental topics

- a. Information needed on Category I impacts and NRC staff requests for additional information

The staff indicated that it had reviewed Table 9-1 in the Generic Environmental Impact Statement (GEIS) (NUREG-1437) and determined that, while the table does summarize the findings of all 92 issues, only certain of these findings apply to all plants and that others apply to plants that have certain features or systems that operate within specified parameters. The staff also clarified that, although Table 9-1 is helpful in determining what conclusions were drawn for each impact issue, it does not assist the staff in meeting its obligation to describe, in a supplemental environmental impact statement (SEIS), the nuclear power plant, the site, and the plant's interaction with the environment as directed by Chapter 2 of the environmental standard review plan (NUREG-1555, Supplement 1). The staff reiterated that guidance to the industry on how an environmental report (ER) for license renewal can be prepared is provided in Chapters 2 and 3 of Regulatory Guide 4.2, Supplement 1, which addresses information pertaining to the site, environmental interfaces, general plant information, refurbishment activities, and other descriptive information the staff needs to prepare the SEIS. The staff indicated that, to the extent an ER includes this information, the staff will use it to prepare its SEIS. If, however, the ER does not include this information, the staff may need to request it. The staff concluded by encouraging the applicants to raise concerns with specific requests for information to the cognizant project manager for resolution.

- b. Clarification of non-GEIS or regulatory issues

NEI was not prepared to discuss this agenda topic which was a continuation of a topic discussed at the May 31, 2007, meeting. It was agreed that this item will not be included in future meeting agendas until NEI indicates it is ready to discuss it.

c. Status – GEIS update

The staff indicated that the review schedule for the GEIS is subject to further adjustment because technical assistance for the severe accident mitigation alternatives analysis is needed and a contract for this work is needed. The revised schedule will be announced in the future.

d. Status – environmental workshop summary

The staff indicated that a summary of the March 21, 2007, environmental workshop was issued on July 16, 2007, and the package can be accessed in the Agencywide Documents Access and Management System (ADAMS) under Accession Number ML071690361.

e. Severe accident mitigation alternative (SAMA) analyses: Industry notification of a problem with use of SECPOP2000 code as input to MACCS2 code.

The NRC staff and members of the industry provided a brief summary of errors that were recently identified in the codes used to generate SAMA analyses for ERs. The staff indicated that once the errors are well understood and a method to resolve them is identified, the NRC may issue a Regulatory Issue Summary to communicate these items to the industry. When asked what the NRC is expecting the license renewal applicants to do about these errors, the staff responded that applicants need to determine the impacts on their SAMA analyses, identify strategies to resolve them for their specific applications, and discuss these items with the cognizant project manager.

2. Scoping of structures and components credited for recovery from station blackout

Guidance on license renewal scoping and screening for structures and components credited for compliance with the stations blackout rule (10 CFR 50.63) is contained in License Renewal Interim Staff Guidance (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) and the standard review plan for license renewal (NUREG-1800) in which LR-ISG-02 was subsequently incorporated. The guidance indicates that the components and structures that are subject to an aging management review typically include the switchyard circuit breakers that connect to the offsite power transformers. NEI indicated that the staff should consider plant-specific designs and that a manual disconnect device could be credited as the boundary. NEI indicated that the guidance says "typically" and that the NRC has accepted manual disconnect devices in the past on selected applications. The staff responded that the proper interpretation of the guidance is to establish the boundary at the first switchyard circuit breaker from the offsite line and that it would ensure that the guidance is followed in the future. NEI responded that it planned to send the staff a white paper before the next meeting that supports its position.

3. NRC staff on-line access to applicant databases

One applicant previously provided the NRC staff with password protected, read-only access to its online database of onsite documentation that support its license renewal application. This facilitated the staff's preparation for the onsite audit. In response to NEI's request, the staff investigated whether other applicants can provide the staff with the same access. The staff indicated that this option is available to other applicants if the appropriate restrictions are established. The staff will continue to require that the applicant submit all information relied upon to support the staff's safety evaluation report on the docket under oath and affirmation. Applicants interested in pursuing this option should discuss it with their assigned project manager.

4. Metal fatigue time-limited aging analyses and cycle projections

The NRC staff is requesting information on the methodology used for environmentally assisted fatigue analyses and NEI questioned whether the staff has established a new standard. The staff responded that it had not established a new standard and that the standard is as described in the license renewal standard review plan. Applicants have provided the information in the past. If the information is not provided in the application, the staff obtains it using requests for additional information and/or through the audit question and answer process as it has in recent application reviews. NEI indicated that in some cases, the information was not provided for past applications for which renewed licenses were issued. The staff responded that it will review past applications and determine if any action is needed. If action is needed, it will be evaluated under the NRC's backfit procedures in accordance with the requirements of the backfit rule, 10 CFR 50.109.

5. LR-ISG

The NRC staff is on schedule 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 Report (GALL), Aging Management Program (AMP) XI.E6.

6. Status – post-approval renewal inspection procedure (IP-71003) update

The NRC staff plans to send NEI the draft revision of IP-71003 by early 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. Subsequent to the meeting, the draft IP-71003 was sent to NEI and other stakeholders by letter dated August, 9, 2007 (ADAMS Accession No. ML071720222).

7. Lessons learned from recent safety review audits

a. Level of detail for new AMPs that are consistent with the GALL Report

The staff clarified previous discussions on this topic during the June 21, 2007, meeting. For new AMPs that are consistent with a GALL Report AMP without exception, the license renewal application does not need to address the ten elements of an acceptable AMP. Consistency with the GALL Report will be confirmed during the staff's onsite

audit. If any exceptions are taken to the GALL Report AMP, the renewal application must address the exceptions. The renewal application needs to address all ten elements for new plant-specific AMPs that are not consistent with the GALL Report.

b. New observations

No new observations were discussed.

8. Potential new issues

a. Boiling-Water Reactor (BWR) top guide cracking

For BWR top guide irradiation assisted stress corrosion cracking concern, GALL Report AMP XI.M9, "BWR Vessel Internals," recommends that 10% of the top guide locations be inspected within the first 12 years of the period of extended operation (PEO), with 5% of these locations to be inspected within the first 6 years. The staff is currently considering a change to this position through the ISG process. Top guide cracking, which is caused by neutron embrittlement, is time dependent. No indications of cracks within the first 12 years is not indicative that no cracks will form in the last 8 years of the PEO. Already, at Nine Mile Point and Oyster Creek Power Plants, inspections of top guides have revealed cracks. The staff has requested the BWR Vessel Internals Project committee to investigate this issue in 2003, but has yet to receive a response from them.

b. Cable tie wraps

The NRC staff is evaluating this topic and will discuss it in a future meeting when it has completed its evaluation.

9. Public participation

No member of the public chose to participate in the meeting.

/RA/

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

Project No. 690

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ADAMS Accession No: ML072270607

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Letter to Nuclear Energy Institute, from S. Hoffman, dated August 28, 2007

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REGULATORY COMMISSION STAFF AND THE NUCLEAR ENERGY
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July 25, 2007

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License Renewal Telephone Conference Between the
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and the Nuclear Energy Institute (cont.)

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- 45. Claire Rushworth
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- 48. Bill Lunburg
- 49. Jim Holdhaus
- 50. John Hornbuckle
- 51. Glen Riley

Teleconference Agenda
Between the U.S. NRC Staff and the Nuclear Energy Institute
July 25, 2007

Topic	Lead
1. Environmental topics	
a. Information needed on Category I impacts and NRC staff requests for additional information	NRC
b. Clarification of non-GEIS or regulatory issues	NEI
c. Status – Generic Environmental Impact Statement update	NRC
d. Status – environmental workshop summary	NRC
e. SAMA analyses: Industry notification of problem with use of SECPOP2000 code as input to MACCS2 code	NRC
2. Scoping of structures and components credited for recovery from station blackout	NRC
3. NRC staff on-line access to applicant databases	NRC
4. Metal fatigue time-limited aging analyses and cycle projections	NRC
5. Interim staff guidance (ISG)	
a. Updated ISG process	NRC
b. ISG on aging management program XI.E6	NRC
6. Status – post-approval renewal inspection procedure (IP-71003) update	NRC
7. Lessons learned from recent safety review audits	
a. Level of detail for new aging management programs that are consistent with the GALL Report	NRC
b. New observations	NRC/NEI
8. Potential new issues	
a. BWR top guide cracking	NRC
b. Cable tie wraps	NRC
9. Public participation	All