



Public Meeting on Subsequent License Renewal

November 1, 2012

Ground Rules

- Be respectful of and courteous towards all participants
 - Honor all comments and points of view as valid
- One person speaks (clearly) at a time
- Silence your cell phones and mute your lines
- Press *1 to enter the speaking queue
 - Three-minute limit to start and can reenter queue
 - Begin with your name (spell out your last name) and affiliation



Introductions

➤ NRC Staff

Purpose of Today's Meeting

- Receive comments for consideration for subsequent license renewals
- Topic areas
 - Timing of applications
 - Length of renewal period
 - Consideration of exemptions
 - Scope of renewal

Additional Commenting Opportunities

➤ Future meetings

- November 13, 2012
 - Part 51
- November 14, 2012
 - Part 54

➤ By email to:

SLR.Resource@nrc.gov

Timing of Applications

➤ Governing Regulation

- 10 CFR 54.17 (c): An application for a renewed license may not be submitted to the Commission earlier than 20 years before the expiration of the operating license or combined license currently in effect.

Timing of Applications

- Basis for 10 CFR 54.17 (c)
 - A limit was imposed on when an application can be filed to ensure substantial operating experience is accumulated.
 - History of operation over the minimum 20-year period would provide substantial information
 - When considering lead time to replace power and time for NRC review of application 18 to 20 years not unreasonable

Timing of Application

- Is the 10 CFR 54.17(c) criteria appropriate for subsequent renewals?
 - Yes? Basis for continued acceptance
 - No? Basis for unacceptability.
 - Is there a more appropriate time frame?
 - What should the staff consider if the requirement were to be changed for subsequent renewal?

Duration of Subsequent Renewed License

➤ Governing Regulation

- 10 CFR 54.31 (b): A renewed license will be issued for a fixed period of time, which is the sum of the additional amount of time beyond the expiration of the operating license or combined license (not to exceed 20 years) that is requested in a renewal application plus the remaining number of years on the operating license or combined license currently in effect. The term of any renewed license may not exceed 40 years.

Duration of Subsequent Renewed License

- Basis for 10 CFR 54.31 (b)
 - Sufficient technical understanding of age-related degradation exists to develop activities to ensure safe operation for 20 additional years.
 - 20 year limitation will provide a useful opportunity to validate and reassess understanding of age-related degradation.
 - No minimum on duration of renewed license.

Duration of Subsequent Renewed License

- Is the 10 CFR 54.31(b) criteria appropriate for subsequent renewals?
 - Yes? Basis for continued acceptance
 - No? Basis for unacceptability.
 - Is there a more appropriate time frame?
 - What should the staff consider if the requirement were to be changed for subsequent renewal?

Consideration of Exemptions

➤ Governing Regulation

- 10 CFR 54.21 (c)(2) A list must be provided of plant-specific exemptions granted pursuant to 10 CFR 50.12 and in effect that are based on time-limited aging analyses as defined in § 54.3. The applicant shall provide an evaluation that justifies the continuation of these exemptions for the period of extended operation.

Consideration of Exemptions

- Basis for position on exemptions from (SOC)
 - Exemptions are granted with approved plant-specific technical justification.
 - Generally, exemptions are granted because the licensee has an equivalent but alternative method of satisfying the intent of the regulation.
 - Unless exemptions involve a time-dependent function regulatory process sufficient.

Consideration of Exemptions

- Is the 10 CFR 54.21(c)(2) criteria appropriate for subsequent renewals?
 - Yes? Basis for continued acceptance
 - No? Basis for unacceptability.
 - Why should additional exemptions be considered?
 - Should all exemptions be considered that will be in effect for the subsequent renewal period or some portion in addition to those already identified in 10 CFR 54.21(2)?

Scope of Renewal

➤ Governing Regulation

- 10 CFR 54.4
 - (a) Plant systems, structures, and components within the scope of this part are--
 - (1) Safety-related systems, structures, and components [SSCs] which are those relied upon to remain functional during and following design-basis events (as defined in 10 CFR 50.49 (b)(1)) to ensure the following functions--
 - (i) The integrity of the reactor coolant pressure boundary;
 - (ii) The capability to shut down the reactor and maintain it in a safe shutdown condition; or
 - (iii) The capability to prevent or mitigate the consequences of accidents which could result in potential offsite exposures comparable to those referred to in § 50.34(a)(1), § 50.67(b)(2), or § 100.11 of this chapter, as applicable.

Scope of Renewal

➤ Governing Regulation

- 10 CFR 54.4 (cont.)
 - (2) All nonsafety-related systems, structures, and components whose failure could prevent satisfactory accomplishment of any of the functions identified in paragraphs (a)(1)(i), (ii), or (iii) of this section.
 - (3) All systems, structures, and components relied on in safety analyses or plant evaluations to perform a function that demonstrates compliance with the Commission's regulations for fire protection (10 CFR 50.48), environmental qualification (10 CFR 50.49), pressurized thermal shock (10 CFR 50.61), anticipated transients without scram (10 CFR 50.62), and station blackout (10 CFR 50.63).

Scope of Renewal

➤ Governing Regulation

- 54.21(a)(1): For those systems, structures, and components within the scope of this part, as delineated in § 54.4, identify and list those structures and components subject to an aging management review [AMR]. Structures and components subject to an aging management review shall encompass those structures and components
 - (i) That perform an intended function, as described in § 54.4, without moving parts or without a change in configuration or properties. . . .
 - (ii) That are not subject to replacement based on a qualified life or specified time period.

Scope of Renewal

- Is the criteria for determining the SSCs within the scope of license renewal and subject to an AMR appropriate?
 - Yes? Basis for continued acceptance
 - No? Basis for unacceptability.
 - What additional SSCs should be included in the scope, and why they should be included.
 - Should additional components be subject to an AMR? If so why.

Conclusion

- Additional comments?

- Reminder:
 - Additional webinars planned for November 13th and 14th
 - E-mail comments to:
SLR.Resource@nrc.gov