



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

April 8, 2014

MEMORANDUM TO: Bo M. Pham, Chief  
Subsequent Renewal, Guidance,  
and Operations Branch  
Division of License Renewal  
Office of Nuclear Reactor Regulation

FROM: Evelyn H. Gettys, Project Manager  
Subsequent Renewal, Guidance,  
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Office of Nuclear Reactor Regulation *E. Gettys*

SUBJECT: SUMMARY OF THE MEETING BETWEEN THE U.S. NUCLEAR  
REGULATORY COMMISSION STAFF AND THE NUCLEAR  
ENERGY INSTITUTE TO DISCUSS CURRENT LICENSE  
RENEWAL TOPICS

The U.S. Nuclear Regulatory Commission (NRC) staff and representatives of the Nuclear Energy Institute (NEI) met on March 14, 2014, to discuss current license renewal (LR) topics. The agenda and slide presentations are available in the NRC's Agencywide Documents Access and Management System (ADAMS) under Accession Number ML14073A148. Enclosed is a list of the meeting participants.

A summary of the meeting's discussions follows:

1. Status of Interim Staff Guidance, Regulatory Issue Summary and Information Notice

A brief status report was given on NRC's LR guidance documents and other documents currently being developed for issuance. No additional documents are currently being planned for this list.

2. SECY Paper

The NRC staff issued SECY-14-0016 "Ongoing Staff Activities to Assess Regulatory Considerations for Power Reactor Subsequent License Renewal" (ADAMS ML14050A306). This paper proposes changes to clarify and update 10 CFR Part 54 "Requirements for Renewal

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of Operating Licenses for Nuclear Power Reactors" and proposes additional considerations for subsequent license renewal (SLR). During the meeting the staff discussed the proposed rule changes which include: (a) reference an update in 10 CFR 54.4(a)(3) for protection against thermal shock events; (b) include the systems, structures, and components (SSCs) associated with 10 CFR 50.54(hh)(2) equipment; (c) clarify how recordkeeping requirements apply to newly identified SSCs in 10 CFR 54.37(b), and (d) address timely renewal expectations.

The staff also discussed the proposed considerations for SLR. They include assessing the effectiveness of aging management activities, defining the timing of SLR applications and potential changes to the current licensing basis from post-Fukushima activities.

### 3. SLR SECY Paper and Forum Summary

NEI commented on the recently issued SECY-14-0016 paper, stating that they support Option 1 which is "no change to the existing 10 CFR 54 regulations." NEI stated that, in their opinion, 10 CFR 54 regulations are adequate and that the established process works for maintaining safety. NEI agrees with the staff's recommendation that no probabilistic risk assessment is needed for SLR applications. NEI stated that they will be submitting their comments on the SECY-14-0016 paper by letter to the NRC.

### 4. MRP-227 Implementation Discussion

The staff provided background information and the general timeline of MRP-227-A which indicated that the program's implementation will be completed by December 31, 2013, and that pressurized-water reactor licensees should have MRP-227-A programs in place. The Regulatory Issue Summary (RIS)-2011-07 which distinguished between Categories C and D was based on the expectation that currently pending renewal applications would be renewed by 2013. Renewal of the Category C applicants did not occur in 2013 for reasons unrelated to MRP-227-A implementation. Applicants should have MRP-227-A programs in place at this time and Category C applicants need to resolve their action items prior to renewal.

### 5. AMP Effectiveness Self-assessment Progress Update

The industry is working on additional guidance that will help define aging management programs (AMP) effectiveness. The guidance will further analyze effectiveness through the periodic self-assessment of each AMP. These guidelines are being finalized and table top simulations are to be conducted.

### 6. GALL Industry Panel Progress

The NEI has developed an expert panel and this panel will be submitting their comments by letter to the NRC.

### 7. OE progress update

The NEI working group has been working on revising the Institute of Nuclear Power Operations Consolidated Event System (ICES) database to identify and flag significant age-related degradation. This will require reporting unanticipated or new age-related degradation, significant degradation that is not a failure and aging effects not detected with established aging management techniques. Trial runs of the new changes have started and the completion date for this effort is the 4th quarter of calendar year 2014.

8. Fermi LRA

DTE Energy will be submitting a license renewal application (LRA) to the NRC for Fermi, Unit 2, which is an 1170 megawatt electrical boiling-water reactor with a Mark 1 containment located on the western shore of Lake Erie.

9. New Topics

No new topics were identified.

10. Action items

NEI: Arrange workshop meeting to discuss SLR roadmap, philosophy, and operating experience.

11. Public Participation

No one from the public provided comments at the meeting.

Enclosure:  
As stated

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management techniques. Trial runs of the new changes have started and the completion date for this effort is the 4th quarter of calendar year 2014.

12. Fermi LRA

DTE Energy will be submitting a license renewal application (LRA) to the NRC for Fermi, Unit 2, which is an 1170 megawatt electrical boiling-water reactor with a Mark 1 containment located on the western shore of Lake Erie.

13. New Topics

No new topics were identified.

14. Action items

- 1- NEI: Arrange workshop meeting to discuss SLR roadmap, philosophy, and operating experience.

15. Public Participation

No one from the public chose to ask questions or provide comments at the meeting.

Enclosure:  
As stated

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**ADAMS ACCESSION No: ML14079A402**

\*concurring via email

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**MEETING BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION STAFF AND THE  
NUCLEAR ENERGY INSTITUTE TO DISCUSS CURRENT RENEWAL TOPICS**

**PARTICIPANTS LIST**

December 5, 2013

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Jon Hornbuckle	SNC
Massoud Tafazzoli	AREVA
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Fred Polaski	Polaski Consulting LLC
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