



Industry Perspectives on Renewal Application Format and Content

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Background

- Five specific license applications submitted provide good precedents, except for learning aging management concept
- One CoC renewal application submitted to date – VSC-24 (CoC 1007)
- VSC-24 Application, informed by NRC Request for Supplemental Information provides good model for CoC renewal application
- Industry determined NEI 14-03 would be a suitable location for guidance to set down basic format and content of CoC renewals

Format and Content

- Format and content guidance in the draft NEI 14-03 suggests including the following:
 - Cover letter with basic information about the CoC the duration of the renewal period being requested, and identifying the content of enclosures
 - Enclosures including a table of contents and sections that align with NUREG-1927
 - Appendices with proposed FSAR and CoC information related to aging management
- Draft is under industry review

Format and Content

- Key elements for efficient NRC review:
 - References cited clearly with revision or edition and specific section cited
 - Technically supported actionable acceptance criteria in proposed AMPs – from existing codes and standards where possible
 - Provide copies of reference documents not easily obtainable by NRC staff (as allowed by copyright permission)
 - Identify proprietary material appropriately and include affidavit and non-proprietary versions
 - Discuss the status of the cask system
 - Licensing history
 - Current state of use (still being deployed?, any amendments never used?)
 - Clearly define the certification basis for each amendment

Format and Content

- Compliance matrix identifying where information is found in the application for each NUREG-1927 review criterion
- Location of information on operations-based aging management and toll gates still being discussed
 - Appendix with sample toll gate
- Certification Basis - Identify the specific amendments being renewed and provide applicable licensing drawings for each unless latest drawings provide full backwards compatibility)
- 72.48 – FSAR information and drawings must include changes implemented under 72.48, as applicable to each amendment being proposed for renewal
- Fabrication Deviations – Deviations accepted as-is for certain components must be identified

Format and Content

- Specific split of information among CoC, FSAR, and implementing procedures still under discussion
- Need a balance of what information needs NRC approval to change versus the ability for licensees and CoC holders to efficiently respond to findings from research, OE, monitoring, and inspections
- Consistency with Part 50 aging management activities seen as a key for licensees