

April 27, 2015

MEMORANDUM TO: Brian E. Thomas, Director
Division of Engineering
Office of Nuclear Regulatory Research

FROM: Lawrence E. Kokajko, Director **/RA/ by MGavrilas for**
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

SUBJECT: RESULTS OF PERIODIC REVIEW OF REGULATORY GUIDE 1.188

This memorandum documents the US Nuclear Regulatory Commission (NRC) periodic review of regulatory guide (RG) 1.188, Revision 1, "Standard Format and Content for Applications to Renew Nuclear Power Plant Operating Licenses," published in September 2005. The RG provides guidance on the information that applicants must submit in their applications for renewal of nuclear power plant operating licenses, as well as the format that the NRC staff considers acceptable for structuring and presenting the required information. As discussed in Management Directive 6.6, "Regulatory Guides," the NRC reviews RGs approximately every five years to ensure that the RGs continue to provide useful guidance. The documentation of the Office of Nuclear Reactor Regulation (NRR) staff review is enclosed.

Based on the results of the periodic review, the NRR staff concludes that no changes to the RG are warranted at this time. However, the NRR staff identified some technical and regulatory issues that are currently under development and are expected to be fully developed in the second quarter of calendar year 2017. The NRR staff plans to revisit updating the RG in the fourth quarter calendar year 2017.

Enclosure:
RG Periodic Review

CONTACT: Leslie Perkins, NRR/DPR
(301) 415-2375

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Regulatory Guide Periodic Review

Regulatory Guide Number: 1.188
Revision number: 1

Title: **Standard Format and Content For Applications To Renew Nuclear Power Plant Operating Licenses**

Office/division/branch: **NRR/DLR/RSRG**
Technical Lead: **Araceli T. Billoch Colón**

Staff Action Decided: **Reviewed issues identified for future consideration**

1. What are the known technical or regulatory issues with the current version of the Regulatory Guide (RG)?

RG 1.188, Revision 1 (Rev. 1), "Standard Format and Content for Applications to Renew Nuclear Power Plant Operating Licenses," issued in September 2005 provides guidance on the information that applicants must submit in their applications for renewal of nuclear power plant operating licenses, as well as the format that the US Nuclear Regulatory Commission (NRC) staff considers acceptable for structuring and presenting the required information.

The NRC staff did not identify any technical or regulatory issues that may warrant a revision of the RG at this time. However, the staff is in the process of updating the "Standard Review Plan for the Review of License Renewal Application for Nuclear Power Plants" (NUREG -1800) and the "Generic Aging Lessons Learned Report" (NUREG-1801) for subsequent license renewal activities for nuclear power plant operations beyond 60 years. The RG also endorses the industry license renewal document Nuclear Energy Institute (NEI) 95-10, Revision 6, "Industry Guidelines for Implementing the Requirements of 10 CFR [Title 10 to the *Code of Federal Regulations*] Part 54 - The License Renewal Rule" that was last published in June 2005. Based on discussions with NEI staff, the next version of NEI 95-10 will include information from the NUREGs for subsequent license renewal.

2. What is the impact on internal and external stakeholders of not updating the RG for the known issues, in terms of anticipated numbers of licensing and inspection activities over the next several years?

There are no identified safety concerns if the RG is not updated that will impact licensing activities. The NRC anticipates approximately five license renewal submittals for 40 to 60 years of operations between 2015 and 2021 that involve the use of this RG.

3. What is an estimate of the level of effort needed to address identified issues in terms of full-time equivalent (FTE) and contractor resources?

The NRC staff requires approximately 1-2 FTE to compile the information and develop the changes for this RG. This activity will require coordination with the NRC Office of Nuclear Reactor Regulation and the Office of Nuclear Regulatory Research. The NRC staff would also need to coordinate with industry stakeholders as part of the development of the next revision of

ENCLOSURE

NEI-95-10. The organizations that will be involved are cognizant of the need for updating this RG. Contractor support may be utilized in lieu of staff resources if dictated by resource constraints.

- 4. Based on the answers to the questions above, what is the staff action for this guide (Reviewed with no issues identified, Reviewed with issues identified for future consideration, Revise, or Withdraw)?**

Reviewed with issues identified for future consideration.

- 5. Provide a conceptual plan and timeframe to address the issues identified during the review.**

Although the NRC does not currently plan a revision this RG, a revision to the RG would be based on the updates to NUREG-1800 and NUREG-1801 for subsequent license renewal activities. The NUREGs are expected to be finalized in the second quarter of calendar year 2017, and a revision to NEI 95-10 would follow. Therefore, the staff plans to revisit the review of RG 1.188 in the fourth quarter of calendar year 2017.

NOTE: This review was conducted in March 2015 and reflects the staff's plans as of that date. These plans are tentative and are subject to change.