



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

August 24, 2015

MEMORANDUM TO: Steven D. Bloom, Chief
Subsequent Renewal, Guidance,
and Operations Branch
Division of License Renewal
Office of Nuclear Reactor Regulation

FROM: Abdul Kazi, Project Manager Engineer */RA/*
Subsequent Renewal, Guidance,
and Operations Branch
Division of License Renewal
Office of Nuclear Reactor Regulation

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

The U.S. Nuclear Regulatory Commission (NRC) staff and representatives of the Nuclear Energy Institute (NEI) met on June 11, 2015, to discuss various topics on license and subsequent license renewal. The agenda and slide presentations are available in the NRC's Agencywide Documents Access and Management System (ADAMS) under Accession No. ML15211A402. The enclosure is a list of the meeting participants.

A summary of the meetings discussion follows:

1. Opening remarks:
 - a. The NRC staff, in their opening remarks, discussed several issues including NRC international involvement on license renewal (LR) and subsequent license renewal (SLR) to be discussed by the staff with Mexican regulators on International Generic Ageing Lessons Learned (iGALL) related activities, and with the International Atomic Energy Association (IAEA) in Vienna. They indicated that Sequoyah is likely to be the next plant to receive a renewed license after a few issues are updated in the final SER, and the Byron and Braidwood final SER is near publication. The staff is working on the safety and environmental reviews for Diablo Canyon; an environmental audit is scheduled in August 2015.

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On SLR issues, the staff is finalizing the quality assurance (QA) process of the GALL-SLR and SRP guidance documents. The NRC received a copy of the NEI SLR Roadmap; and it's under review by the staff. The staff is looking forward to the Oak Ridge National Lab trip in July to learn more about the industry's SLR research efforts.

- b. The NEI representative indicated that the industry has invested a lot of effort in advancing SLR in the past year, and the industry has demonstrated that the U.S. fleet can operate safely beyond 40 years and they are looking forward to SLR to demonstratively show that the plants can be safely operated beyond 60 years as well.

2. Staff Presentations:

a. Action Items from March 13, 2015, quarterly meeting

The staff presented the five action items from the March 13, 2015, quarterly meeting. The first three items (April 8 & May 7, 2015, meetings and the trip to EPRI Charlotte facility in April 2015) were completed and closed, and the remaining two items (visit to ORNL in July and the June 18 teleconference with NEI meeting) remain open.

b. Changes to XI.M12 "Thermal Aging Embrittlement of CASS"

The staff proposed that the pump casings are no longer exempt from aging management program (AMP) requirements, and indicated that the AMP incorporates Code Case N-824 and the changes in the AMP terms of "potentially susceptible" to "potentially significant" and "susceptibility" to "significance." An EPRI representative stated that EPRI is aware of the changes proposed in XI.M12 and is reviewing the proposed changes to provide their comments.

c. Changes to XI.M36 "External Surfaces Monitoring of Mechanical Components"

The AMP for SLR will include structures, systems and components, and the surface examinations of the AMP expanded to every 10 years. A couple of questions arose regarding the percentage and surface area if the new language is adopted, and number of samples under the current program.

d. Changes to XI.M38 "Inspection of Internal Surfaces of Miscellaneous Piping and Ducting Components"

The AMP added elastomers, flexible polymeric components, reduction of heat due to fouling and detailed expectations for inspections. A question arose about why XI.M27 "Fire Water System" is not applicable; also an NEI representative indicated that industry might have additional questions after they have some time to review and digest the proposed changes.

Note: All changes proposed by the staff are pre-decisional and NRC welcomes public comments.

e. Discussion of RIS 2014-06

The staff discussed regulatory issues of RIS 2014-06 "Consideration of Current Operating Issues and Licensing Actions in License Renewal," that can affect a license

renewal application, changes to the current licensing bases and the understanding of Title 10 of the Code of Federal Regulations (10 CFR 54.37(b)). Both the staff and the industry discussed the definitions of degraded conditions and degraded AMPs.

f. Effect of recent operational experience issues with the loose parts at Sequoyah.

The staff presented the recent operational events that were discovered at Sequoyah plant last April, where two surveillance capsules were lost, capsules were broken apart, and a large number of parts was discovered in the lower vessel. The staff discussed the impact of these events on LR.

3. Industry's presentation on:

a. EPRI SLR Status Review of Materials Reports:

The EPRI representative presented the EPRI SLR Status Review of Materials Reports and provided an update on the status of the review of technical reports and their applicability to 60-80 years of operation.

b. Pressurized Water Reactor Owner Group (PWROG) Activities:

The NEI representative stated that PWROG is actively working on multiple SLR-related issues; they may have preliminary results available by December 2015.

c. Oak Ridge National Laboratory trip in July:

NEI extends an open invitation to all NRC staff interested in visiting the ORNL.

d. Update on NEI 14-12 and NEI 14-13:

An NEI representative provided an update on NEI 14-12 "Aging Management Program Effectiveness," and NEI 14-13 "Use of Industry Operating Experience for Age-Related Degradation and Aging Management Programs," documents as indicated below:

- i. NEI 14-13 – Rev. 0 was approved by industry last December; NEI is working with the Institute of Nuclear Power Operations (INPO) to implement this guideline. It was projected to finalize the wording in Rev. 1 of the guideline by the end of June. INPO will issue INPO 12-009 at the end of 2015 when NEI 14-13 becomes effective.
- ii. NEI 14-12 – This guidance was released to industry in February 2015. NRC staff suggested that further dialogue(s) between NRC and NEI are needed.

e. Update on the Lead Plants Focus Group (LPFG):

In the past year, the LPFG has invested a large effort to organize the activities (including receiving upper management support) surrounding SLR, mainly in the area of supporting GALL-SLR. NEI plans to keep NEI 95-10 as-is for the plants seeking the first renewal and prepare a separate document (e.g., NEI 16-XX) providing SLR guidance to industry. Industry appreciated the drop-in opportunity with NRC management recently. The LPFG inquires whether NRC could provide an exemplary LR application from the first renewal experience to guide the industry for the subsequent renewal.

f. SLR Roadmap

The SLR Roadmap has been shared by NEI with NRC; it will be made available on the NEI website in a few weeks. This document was built upon a previous white paper and contains more infographics and photos with improved and clearer language.

4. Regulatory Process

NRC staff discussed the following topics of the regulatory process:

- a. NRC staff has been busy with QA of the GALL-SLR and SRP tables to ensure accuracy in the past weeks. Starting next week, the staff will ask the contractor to prepare the draft documents. The public will have a 60-day comment period when the SLR documents are issued. On June 18, 2015, the staff will hold a teleconference public meeting with industry to discuss the numbering and table format of GALL-SLR.
- b. NRC presented an example of various definitions of air from different LRAs in the past (ADAMS Accession No. ML15236A032). For uniformity purposes, NRC requested assistance from the industry to consolidate multiple definitions of the same material (or group of materials) into fewer ones when applicable.
- c. NRC plans to add a standing item to future quarterly meeting agendas to inform the public of any upcoming guidance documents (e.g., ISG).

5. Action Items:

- a. Further discussion(s) on NEI 14-13 and NEI 14-12 in future quarterly meetings.
- b. Open invitation to NRC on the upcoming ORNL trip in July.
- c. NRC will review the EPRI documents discussed in Rich Tilley's presentation.
- d. NRC and industry will coordinate efforts to prepare for the ACRS briefing on SLR in November 2015.
- e. NRC and industry will coordinate efforts to prepare a Commissioner's Assistant note on SLR in August 2015.
- f. For the NEI SLR Roadmap, NRC suggested to embed live links to connect the Roadmap to other relevant sites (e.g., DOE/EPRI SLR sites).
- g. NRC will schedule a presentation on the best practice from experience in reviewing earlier LRAs in a future quarterly meeting.
- h. For future quarterly meetings, staff will upload presentation slides to the public meeting website prior to the meeting so members of the public from remote locations could better follow along with the discussions.
- i. NRC will provide feedback to NEI on a future NEI 95-10 like document for the SLR.
- j. Once the SLR guidance documents are issued for public comment and prior to the closing of the public comment period, NRC plans to schedule two separate public meetings to further discuss the guidance documents with industry in the January and February 2016 timeframe.

Finally, for closing remarks, NEI representatives encouraged staff and industry to bring up more comments on the SLR guidance documents. NRC staff indicated that with the Commissioners' approval of Project AIM 2020, it's more important for the staff to strive for greater efficiency

and effectiveness with fewer resources. For instance, when reviewing future LRAs, staff will use a better and smarter RAI process.

6. Public Participation

No one from the public participated.

Enclosures:

- 1) Agenda (ML15183A065)
- 2) NRC Staff Presentation (ML15161A576)
- 3) Industry Presentations (ML15211A400)
- 4) NEI SLR Roadmap (ML15211A401)
- 5) Definition of Air (ML15236A032)

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ADAMS ACCESSION No: ML1515183A062 *Concurred via e-mail

OFFICE	LA:RPB2:DLR*	PM:RSRG:DLR	BC:RSRG:DLR
NAME	YEdmonds	AKazi	SBloom
DATE	8/10/15	8/11/15	8/24/15

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Attendance List

No	NAME	AFFILIATION
1	Chris Miller	The Nuclear Regulatory Commission (NRC)
2	Jane Marshal	NRC
3	Steven Bloom	NRC
4	John Daily	NRC
5	Roger Kalikian	NRC
6	Araceli Billoch	NRC
7	WM "Butch" Burton	NRC
8	Albert Wong	NRC
9	Daneira Melendez	NRC
10	Yaira Diaz	NRC
11	Pardeep Viridi	NRC
12	Bill Holston	NRC
13	Christopher Hovanec	NRC
14	Jeffry Poehler	NRC
15	Dennis Morey	NRC
16	Abdul Kazi	NRC
17	Gary Peters	NEI
18	Jerud Hanson	NEI
19	Jeff Mulvehill	Southern
20	Istvan Frankl	NRC
21	Bart Fu	NRC
22	Fred Polaski	Polaski Consulting
23	Todd Anselmi	Enercon
24	Brian Jelke	Sargent & Lundy
25	Albert Piha	Exelon
26	Kevin Lynne	DTE Energy
27	David Clohecy	Exelon
28	Dave Gerber	Structural Integrity Inc.
29	Edward Carley	NextEra Energy Seabrook
30	John Hilditch	Exelon
31	Paul Aitken	Dominion
32	Rich Tilley	EPRI
33	Michelle Olsofsky	PG&E
34	Mike Franklin	Duke Energy
35	Massoud Tafazzoli	AREVA
36	Alan Cox	Entergy
37	John O'Rourke	PSEG