



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
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April 27, 2020

MEMORANDUM TO: Lauren Gibson, Acting Chief
License Renewal Projects Branch
Division of New and Renewed Licenses
Office of Nuclear Reactor Regulation

FROM: William F. Burton, Senior Project Manager **/RA/**
License Renewal Projects Branch
Division of New and Renewed Licenses
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF APRIL 3, 2020, TELECONFERENCE ON TOPICS
RELATED TO LESSONS LEARNED FROM THE REVIEW OF
THE FIRST SUBSEQUENT LICENSE RENEWAL
APPLICATIONS

On April 3, 2020, the U.S. Nuclear Regulatory Commission (NRC) held a Category 2 public meeting to discuss the NRC staff and industry experience in the review of River Bend Station, Unit 1 initial license renewal application which piloted the optimized 18-month review process for subsequent license renewal (SLR) applications, as well as the reviews of the first three SLR applications: Turkey Point Nuclear Generating Units 3 and 4, Peach Bottom Atomic Power Station, Units 2 and 3, and Surry Power Station, Units 1 and 2. At this meeting, the staff and industry agreed that the highest priority was the identification of technical issues for which revisions to NUREG-2191 "Generic Aging Lessons Learned Report for Subsequent License Renewal (GALL-SLR) Report," and NUREG-2192, "Standard Review Plan for Review of Subsequent License Renewal Applications for Nuclear Power Plants," guidance documents are needed.

On December 12, 2019, the NRC held a second Category 2 public meeting to discuss lessons learned from the NRC staff reviews of the three SLR applications. The focus of this second meeting was on the technical issues that are ready for inclusion in revisions to the SLR guidance documents.

On February 20, 2020, the NRC held a third Category 2 public meeting to continue discussions regarding lessons learned from the review of the SLR applications. The focus of this third meeting was the review of summaries prepared by the staff that address guidance revisions proposed by the industry. The staff was in alignment with the industry on most of the proposed

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revisions. During this meeting, the industry requested that meetings be held between the quarterly lessons learned meetings to allow opportunities to discuss specific technical subjects in more depth than is possible during the quarterly meetings.

On March 25, 2020, the NRC staff hosted the first interim meeting on several topics of interest to the staff and industry.

On April 3, 2020, the NRC staff hosted the second interim meeting to follow up on topics discussed at the interim meeting on March 25, 2020.

Enclosed is the summary of the discussion topics.

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LESSONS LEARNED FROM THE REVIEW OF THE FIRST SUBSEQUENT
LICENSE RENEWAL APPLICATIONS DATE APRIL 27, 2020

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Summary of Discussions

Approximately 30 participants attended the meeting.

Following the welcome of meeting attendees, the Nuclear Regulatory Commission (NRC) staff industry discussed the following items:

Vessel Supports

1. The staff and industry have agreed that this item will be addressed in the 2nd Set of interim staff guidance (ISGs). Industry provided some written comments on the proposed draft ISG, which the staff will consider.
2. Industry noted several inconsistencies associated with neutron energy spectrums and gamma dose associated with fluence modeling and estimation. Situations where fluence estimate required by the further evaluation may not be required were also discussed. An example of an alternate approach to that identified in the further evaluation is Electric Power Research Institute (EPRI) 3002014882. "An Assessment of the Integrity of BWR Vessel Structural Steel Supports for Long-Term Operations."
3. The NRC discussed the current process for accessing EPRI reports on the portal.
4. Staff is discussing whether process exists for considering the use of non-staff-approved topical reports and other generic documents in guidance development.

F-J Item 15

1. Staff asked several questions related to the environment information in the Aging Effect/Mechanism column of the line item for issue #15 in the Nuclear Energy Institute's (NEI) F-J table (management of cracking, blistering, and loss of material (LOM) in polymeric (fiberglass) tanks exposed to a fuel oil environment).
2. Staff has submitted a request for access to the EPRI document referenced under Issue #15 (3002011822).

XI.M42 - Internal Coatings/Linings

1. The industry would like to credit activities in AMP XI.M27 for aging management of cementitious linings or other coatings in fire water system piping, in lieu of performing periodic inspections as recommended in AMP XI.M42.
2. The industry noted that the NRC staff's summary of the revisions did not include a 6-year lookback on Operational Experience (OpE) from inspections. The staff believes that referencing opportunistic inspections negates the need to identify a specific lookback period. Industry does not agree and will provide NRC staff with a summary of its position for deleting the operating experience portion of the condition.

Enclosure

XI.S1 – ASME Section XI, Subsection IWE

1. Staff provided further evaluation language that would allow an applicant to not take an exception for a fatigue waiver.
2. Industry indicated the revised approach in the further evaluation is acceptable.

XI.M16 A - PWR Vessel Internals

1. Industry provided a roadmap for the submittal of MRP-227 Revision 2, which would provide a simplified gap analysis or eliminate the need for a gap analysis when MRP-227 Revision 2-A is issued. Because MRP-227 Revision 2 has not yet been submitted for staff review, staff is preparing an ISG based on MRP-227 Revision 1A. The staff will discuss at the April 7 public meeting. Industry requested that staff's presentation include some Westinghouse-specific examples of revised AMR items.

XI.S8 – Protective Coatings

Industry proposed a change to allow applicants to extend their coatings inspection intervals and the NRC staff provided additional requirements an applicant need to meet to extend inspection intervals.

The NRC staff provided revised language describing these additional requirements. Industry requested clarifications to language in Element 5 (Monitoring and Trending) related to information requirements when an applicant chooses to extend the inspection interval recommended in the Generic Aging Lessons Learned (GALL) subsequent license renewal (SLR) of every refueling outage. NEI intends to discuss this with industry counterparts and provide feedback to the NRC.

Proposed revisions to F-J notes

1. Informed industry that staff is taking another look at the proposed revisions with more consideration of the benefits of making the revisions vs the cost of making the revision. This consideration will also be applied to proposed revisions initiated by the staff.
2. Industry asked that staff identify specific F-J revisions that it feels requires more justification. These will be discussed at the April 7 meeting.

Aging Management of Spent Fuel Pool Liner

The industry requested the staff to consider adding an AMR item to manage cumulative fatigue damage to stainless steel in a treated water or borated treated water environment using time-limited aging analysis (TLAA) 4.7, "Other Plant-Specific Time-Limited Aging Analyses." The industry provided its basis for the staff to consider adding the AMR item. The staff does not believe that a new AMR item is necessary. The staff notes that standard review plan SLR Table 3.5-1 and GALL-SLR listed AMR items provide guidance for generic reviews of structures/components in SLRAs. The industry's proposal addresses plant-specific TLAA for a

non-ASME structure/component benefitting SLRA reviews for a handful of plants; however, use of an F-J note does not pose any additional burden. Acceptance of the industry proposal would provide inefficiencies for the majority of SLR applicants that would have to address the AMR item and its Further Evaluation and for staff in its reviews of the same.