



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

December 18, 1996

ORGANIZATION: Nuclear Energy Institute (NEI)

SUBJECT: SUMMARY OF MEETING WITH NEI REGARDING THE STAFF'S DRAFT
REGULATORY GUIDE AND NEI'S GUIDELINE FOR IMPLEMENTING THE
LICENSE RENEWAL RULE

On December 11, 1996, representatives of NEI met with the Nuclear Regulatory Commission (NRC) staff in Rockville, Maryland to discuss topics for which NEI proposes guidance be included in either its "Industry Guideline for Implementing the Requirements of 10 CFR Part 54 - the License Renewal Rule," NEI 95-10, or in the final version of the staff's Draft Regulatory Guide, DG-1047, "Standard Format and Content for Applications to Renew Nuclear Power Plant Operating Licenses." The meeting attendees are listed in Attachment 1.

The public comment period on the draft regulatory guide (RG) ended on November 29, 1996. The staff and NEI met to discuss topics that need to be addressed in either the final RG or NEI 95-10 which the draft RG proposes to endorse as an acceptable method for implementing the license renewal rule. The staff and NEI plan to follow the same approach for developing the final RG and version of NEI 95-10 as was used to develop the draft RG and NEI 95-10, Revision 0. This involves development of guidance through a combination of staff comments and proposed inserts for NEI 95-10 and industry proposed revisions to NEI 95-10. The staff's intent is that all guidance be incorporated into NEI 95-10, with, if necessary, additional staff guidance, clarifications, or exceptions to NEI 95-10 in the final RG. The NRC and NEI senior management steering groups will also be used again in finalizing the guidance with the first meeting to be held in January 1997.

The schedule for issuing the final RG in August 1997 requires resolution of comments by February 14, 1997, and preparation of the final RG and version of NEI 95-10 for approval by March 14, 1997. The final RG will be submitted to the Advisory Committee on Reactor Safeguards and the Commission for approval. A Commission briefing on the status of license renewal activities, which will include the final RG, is scheduled for the week of June 16, 1997.

NEI requested the meeting to clarify the new items added in Revision 7 of its Index of Questions/Comments submitted by letter dated December 6, 1996. The items discussed are designated with a "96" prefix in the "Questions/Topic No." column and capture new topics identified during the NEI 95-10 demonstration program. A summary of the information presented by NEI is contained in Attachment 2.

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In addition to the topics discussed in Attachment 2, the following topics involving potential revisions in the guidance were also discussed:

A. Use of Approved Topical Reports

Additional guidance is needed concerning the information required in an application to demonstrate the applicability of previously approved topical reports for an applicant's specific plant.

B. Commodity Groups

Based on experience gained in the demonstration program, additional guidance is needed for the information to be submitted in an application to identify and describe the basis for commodity groups established.

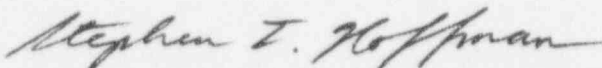
C. NEI 95-10 Examples

Currently, the draft RG indicates that the examples contained in NEI 95-10 illustrate the process and are not considered sufficient by the staff for demonstrating that the effects of aging for the components discussed will be adequately managed. NEI indicated that the industry desires more examples and for the staff to endorse the examples as acceptable for aging management.

D. Inspections for License Renewal

NEI indicated that additional guidance is needed regarding the information required in an application for inspections, particularly for future inspections where the requirements of the code or standard on which the inspections are based may change.

The staff indicated that the schedule for issuing the final RG is short and significant resources will be necessary to develop the required guidance. NEI stated that the industry was prepared to support the effort.



Stephen T. Hoffman, Senior Project Manager
License Renewal Project Directorate
Division of Reactor Program Management
Office of Nuclear Reactor Regulation

Project 690

Attachments: As stated

cc w/att: See next page

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SHoffman (STH)

DMatthews (DBM)

SDroggitis (SCD)

GLainus (GCL)

SPeterson (SRP)

SNewberry (SFN)

OPA (OPA)

EJordan (JKR)

TSpeis (TPS)

GMizuno (GSM)

JMoore/EHoller (JEM)/(EJH)

JMitchell (JAM)

BSheron (BWS)

GHolahan (GMH)

RWessman (RHW)

MMalsch (MGM)

AMurphy (AJM1)

LShao (LCS1)

MMayfield (MEM2)

HBrammer (HLB)

GBagchi (GXB1)

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PTKuo (PTK)

JCraig (JWC1)

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JVora (JPV)

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Project No. 690

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December 18, 1996

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Original signed by:

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ATTENDANCE LIST
NRC MEETING WITH THE NUCLEAR ENERGY INSTITUTE
DECEMBER 11, 1996

<u>NAME</u>	<u>ORGANIZATION</u>
1. Steve Hoffman	NRC/NRR/DRPM/PDLR
2. Doug Walters	NEI
3. Chuck Pierce	Southern Nuclear
4. Fred Polaski	PECO Energy
5. Robert Gill	Duke Power
6. P.T. Kuo	NRC/PDLR
7. R.J. Prato	NRC/PDLR
8. Scott Newberry	NRC/NRR
9. Alice Carson	Bechtel
10. Bill Mackay	Entergy - ANO
11. David Roth	Virginia Power
12. Michael W. Henig	Virginia Power
13. Tricia Heroux	for EPRI
14. Barry Tilden	BGE
15. Chuck Krause	Wisconsin Electric
16. Donald Taylor	NRC/NRR/DRCH/HQMB
17. Richard E. Johnson	NRC/RES/EMMEB
18. David Masiero	GPO Nuclear

LICENSE RENEWAL IMPLEMENTATION GUIDELINE
INDEX OF QUESTIONS/TOPICS, REVISION 7

NEI clarified at the December 11, 1996, meeting the new items added to the index which are designed by the prefix "96." Following is a summary of the information presented and proposed changes to NEI 95-10:

No. 96-

- 01 NEI will propose by December 25, 1996, a revision to the text of NEI 95-10 to match Figure 3.0-1 to ensure that all safety-related systems meeting the criteria of § 54.4(a)(1) are also evaluated against the criteria of § 54.4(a)(2) and (3).
- 02 & 03 These items involve providing additional guidance for implementing the rule requirement to list structures and components subject to an aging management review, particularly for commodity groups. NEI will propose revisions to NEI 95-10 by December 25, 1996, to provide the guidance.
- 04, 05, 06, 08, 16, 17, & 21 These items involve the questions of what information is required to describe the aging management process and to meet the rule requirement in § 54.21(a)(3) to "demonstrate that the effects of aging will be adequately managed," particularly for existing programs. This is currently the most significant area for which additional guidance is needed and will require a substantial effort to revise NEI 95-10. NEI proposes to submit draft NEI 95-10 revisions the week of January 6, 1997, which will include major revisions to Sections 4 and 6.
- 07 NEI will submit by December 25, 1996, proposed revisions to NEI 95-10 to clarify that delaying submittal of time-limited aging analysis (TLAA) evaluations until after the application is submitted is normally an exception. NEI indicated that it was evaluating what the acceptable approach is for dispositioning TLAA's associated with environmentally qualified electrical equipment controlled by 10 CFR 50.49 and requested staff guidance on the subject.
- 09 This item documents the need to expand the guidance in NEI 95-10, Section 6.3, regarding the information to be contained in the Final Safety Analysis Report supplement required by § 54.21(d). The staff and NEI determined that proposed guidance for this topic depends on resolution of other topics and revised guidance will not be completed until the end of January 1997.
- 10 By letter dated October 21, 1996, NEI submitted its review of NUREG-0933 generic safety issues (GSIs) to determine which GSIs are applicable for license renewal and requested staff approval. The staff will review the information submitted and determine if it should be incorporated into NEI 95-10.

- 11 NEI will propose guidance in NEI 95-10 regarding when design loading combination information should be provided in an application.
- 12 The topic of aging management review for complex assemblies was previously designated as Item 95-44 and was dispositioned as part of the development of NEI 95-10, Revision 0. By letter dated February 27, 1996, the staff considered this topic closed.
- 13 & 14 NEI is preparing a "white paper" to provide its position on these topics and any proposed NEI 95-10 revisions. Submittal of the paper is scheduled for the end of January 1997.
- 15 NEI plans to revise wording in NEI 95-10 perceived as requiring proof of the negative to reflect the wording contained in the rule. The staff indicated that it needed to see the revisions to understand the changes NEI is proposing and if they are acceptable.
- 18 Both the NRC staff and NEI will evaluate whether an applicant's certification that the methodology contained in NEI 95-10 was used is acceptable to comply with the requirements of 54.21(a)(2).
- 19 & 20 These items identify components or functions for which determinations were not made in Appendix B of NEI 95-10, Revision 0, as to whether they are subject to aging management review. NEI will submit its determination for staff review by December 25, 1996.