



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

February 4, 1997

ORGANIZATION: Nuclear Energy Institute (NEI)

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

On January 30, 1997, representatives of NEI met with the Nuclear Regulatory Commission (NRC) staff in Rockville, Maryland to present views on proposed guidance for inclusion in the final version of either the NEI "Industry Guideline for Implementing the Requirements of 10 CFR Part 54 - the License Renewal Rule," NEI 95-10, or the NRC staff's Regulatory Guide (RG), "Standard Format and Content for Applications to Renew Nuclear Power Plant Operating Licenses." A list of meeting attendees is provided in Attachment 1.

At the January 21, 1997, meeting with the NRC staff, NEI provided a proposed rewrite of NEI 95-10, Sections 4.2 and 6.0 to address a number of concerns expressed in comment letters received from NEI, Department of Energy, and industry organizations. The NRC staff's initial assessment of the rewrite determined that the proposed rewrite was unacceptable as it contained significant deviations from previous positions established during development of NEI 95-10, Revision 0, and in staff positions established during review of plant-specific and owners group reports. Examples of the issues include:

- NEI's rewrite eliminated much of the detailed guidance that was specifically incorporated into NEI 95-10, Revision 0, as a result of the staff's review of previous NEI 95-10 drafts.
- The rewrite incorporated industry positions on issues that were specifically eliminated based on agreements at senior management meetings between the NRC, NEI, and industry executives (e.g., maintain system level intended function and allow component degradation contrary to the current position in NEI 95-10, Revision 0, that aging management must manage the effects of aging at the component level).
- The NEI rewrite attempts to credit existing programs without demonstrating their adequacy for managing aging during the period of extended operation as required by the license renewal rule.
- The NEI rewrite permits elimination of plausible aging effects without discussion in the license renewal application by crediting existing programs that prevent the occurrence of the effect.

Based on the significant deviations from previously established positions and the elimination of detailed guidance contained in NEI 95-10, Revision 0, the

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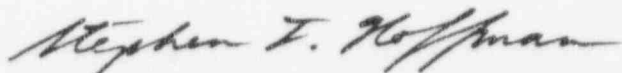
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NRC staff stated that it could not proceed with a review of the rewrite. The staff will transmit to NEI its proposed resolution of public comments received which encompass the issues raised in NEI's rewrite and identify any needed changes to NEI 95-10, Revision 0, or the staff's draft regulatory guide.

Because of the significance of the issues raised, resolution may impact the schedule for issuing the final regulatory guide. The NRC staff indicated that a decision will be made after hearing from NEI as to whether the NRC staff continues the process of interacting with NEI to develop a version of NEI 95-10 that can be endorsed in a final regulatory guide or whether the staff will proceed with development of its own stand-alone regulatory guide.

NEI provided at the meeting its "Discussion on How Bolting is Addressed in the Integrated Plant Assessment for Aging" (Attachment 2). This handout provides proposed revisions to NEI 95-10 to address how bolting will be evaluated for license renewal.

The next meeting between the NRC staff and NEI is scheduled for February 10, 1997.



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

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MMalsch (MGM)

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AMurphy (AJM1)

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LShan (LS1)

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NUCLEAR ENERGY INSTITUTE (NEI)

Project No. 690

cc: Mr. Dennis Harrison
U.S. Department of Energy
NE-42
Washington, DC 20585

Mr. Douglas J. Walters
Nuclear Energy Institute
1776 I Street, NW
Suite 300
Washington, DC 20006

Mr. Richard P. Sedano, Commissioner
State Liaison Officer
State of Vermont
Department of Public Service
112 State Street
Drawer 20
Montpelier, Vermont 05620-2601

ATTENDANCE LIST
NRC MEETING WITH THE NUCLEAR ENERGY INSTITUTE
JANUARY 30, 1997

<u>NAME</u>	<u>ORGANIZATION</u>
1. Steve Hoffman	NRC/NRR/DRPM/PDLR
2. Scott Newberry	NRC/NRR/DRPM/PDLR
3. David Masiero	GPU Nuclear
4. Raymond P. Baker	Southern Company
5. Robert Gill	Duke Power
6. David Roth	Virginia Power
7. Doug Walters	NEI
8. Fred Polaski	PECO Energy
9. Tricia Heroux	EPRI
10. Bill Horin	Winston & Strawn
11. David Terao	NRC/NRR/DE/EMCB

Discussion on How Bolting is Addressed in the Integrated Plant Assessment for Aging

Describe how bolting is addressed in the Integrated Plant Assessment for aging process; i.e. whether it is treated as a component or a subcomponent of a larger component. How is aging of the individual bolting addressed?

Response:

Throughout the IPA process, components are identified by utilizing current plant conventions for naming components. Generally, new components are not created merely for the purposes of license renewal. Current plant conventions for naming components vary somewhat; however, the following guidance is applicable.

NCIG-17 Guidelines for the Safety Classification of Systems, Components and Parts Used in Nuclear Power Plant Applications defines "component" and "part" as follows:

"Component - An assembly of parts that is viewed as an entity for purposes of design, operation and reporting. (IEEE 803) A component is usually assigned a plant unique identification number.

Part - A basic element of a system or component that ordinarily cannot be, or is not, disassembled further for maintenance or purchasing purposes. Examples of parts are valve stems, gaskets, printed circuit boards, and relay spools."

Generally, plant equipment naming conventions consider "components" to be items which are larger and more complex than individual bolts. Bolting is generally considered to be a part or subcomponent of a larger component. Therefore, bolting is included in the aging management review as a subcomponent of other device types when it contributes to an intended function which is performed without moving parts or a change in configuration or properties. For example, the bolts in a bolted manhole cover for a tank would be evaluated for the effects of aging during the AMR process since these subcomponents contribute to maintaining the pressure retaining boundary of the tank. On the other hand, the bolts which hold a motor end bell to the motor stator housing would not be included in an aging management review since these bolts are passive parts of an active component and therefore not subject to AMR per the guidance provided in the SOC to the LR Rule at 22472.

"Passive parts of structures and components that only perform active functions do not require an aging management review."

Proposed NEI Guide Changes:

On page 21, section 4.1.1, insert the following paragraph between the second and third paragraph.

"Consistent with this strategy [referring to the strategy stated in the previous paragraph], it is not the intent of this guide to change or redefine the normal concept of a "component" when establishing the evaluation boundaries for license renewal. Those items which are identified as components for other reasons such as safety classifications and maintenance activities should be considered "components" for the purposes of license renewal. Those items which are considered "subcomponents" or "parts" during the performance of other plant activities should be considered "subcomponents" or "parts" for the purposes of license renewal. For example, bolting is an item which is normally considered a subcomponent or part of a larger component. Therefore, during the IPA, the need to evaluate the effects of aging on bolting depends on whether the parent component is subject to aging management review. If the parent component is subject to AMR and the bolting contributes to the performance of an intended function which is performed without moving parts or a change in configuration or properties, then the effects of aging of the bolting needs to be considered in the AMR. If, on the other hand, the bolting is a part of a component which performs only active intended functions, then the effects of aging on the bolting would not be considered in the IPA. (The parent component would not be subject to AMR.)"

NRC staff stated that it could not proceed with a review of the rewrite. The staff will transmit to NEI its proposed resolution of public comments received which encompass the issues raised in NEI's rewrite and identify any needed changes to NEI 95-10, Revision 0, or the staff's draft regulatory guide.

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Original signed by:

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

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