

March 19, 2010

ORGANIZATION: Nuclear Energy Institute

SUBJECT: SUMMARY OF THE LICENSE RENEWAL MEETING BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION STAFF AND THE NUCLEAR ENERGY INSTITUTE TO DISCUSS GENERIC AGING LESSONS LEARNED REPORT UPDATE AND CURRENT LICENSE RENEWAL TOPICS

The U.S. Nuclear Regulatory Commission staff (NRC or the staff) and representatives of the Nuclear Energy Institute (NEI) met on February 24, 2010, to discuss the update of NUREG-1801, Revision 1, "Generic Aging Lessons Learned (GALL) Report," dated September 2005, and current license renewal topics and activities. Enclosures to this letter are a list of the meeting participants and the meeting agenda. The NRC staff provided several handouts at this meeting and they are available in the NRC's Agencywide Documents Access and Management System under Accession No. ML100560453. A summary of the meeting's discussions follows.

Morning Session – GALL Report Update Topics

1. Draft Aging Management Programs

The staff updated NEI representatives on the license renewal guidance document (LRGD) update initiative. The staff discussed three draft aging management programs (AMPs) and provided preliminary copies of these draft AMPs as meeting handouts. The purpose of sharing these drafts is to provide transparency in the LRGD update process so that external stakeholders can see what direction the working-level staff is taking on the draft revisions. The discussions concerning each draft AMP are summarized below.

a. XI.M9, "BWR Vessel Internals"

The staff stated that this AMP has been revised to include cast austenitic stainless steel information from another AMP. In addition, information has been added about aging degradation of some additional material alloys (e.g., X-750 and 17-4 PH). Information related to the Boiling Water Reactor Vessel Internal Program has been updated and some additional information has been added concerning recent operating experience.

b. XI.M11B, "Cracking of Nickel-Alloy Components and Loss of Material Due to Boric Acid-Induced Corrosion in Reactor Coolant Pressure Boundary Components (PWRs Only)"

The staff stated that this AMP has been revised to address a number of changes in the *Code of Federal Regulations*, specifically Section 50.55a of Title 10, and in the related American Society of Mechanical Engineers documents.

c. XI.M16, "PWR Vessel Internals"

The staff stated that this AMP has been completely revised to address ongoing work contained in the Electric Power Research Institute (EPRI) Materials Reliability Program Report MRP-227. The staff modified the suggested draft content for this AMP, which was provided by EPRI. The staff is continuing to work with EPRI and industry stakeholders as the MRP-227 report is reviewed and changes are made in response to staff concerns and questions.

The staff also stated that it is interacting with the EPRI Materials Reliability Program in developing aging management review (AMR) line items associated with this draft AMP. At the meeting, the staff provided handouts of a draft version of the AMR line items for Babcock and Wilcox reactor vessel internals. The staff and NEI representatives briefly discussed the need to generate similar AMR line items for the other two pressurized water reactor vendors.

2. Comments on GALL Report Update

NEI representatives provided some brief comments about other aspects of the draft LRGD material that was previously discussed during a public meeting in early January 2010. These comments concerned buried piping, structures monitoring, and medium-voltage electrical cables.

3. Near Term Milestones: Public Comment Period and Workshop

The staff outlined some schedule information associated with the LRGD update. The planned date to issue the draft LRGDs for formal public comment has moved back to late April 2010. The staff and NEI representatives discussed a plan to hold a two-day workshop on the draft LRGDs in conjunction with an already planned license renewal public meeting in late May 2010.

4. Performance of One-Time Volumetric Inspections of Socket Welds in Small Bore Piping

The staff discussed operating experience of small bore piping socket welds with NEI. The NEI representatives indicated that most of the operating experience was related to design or current operating issues under 10 CFR Part 50. The staff requested NEI to provide a summary of the operating experience for the staff's further consideration.

5. Public Participation

A member of the public asked for some clarifications concerning topics discussed during the meeting's morning session.

Afternoon Session – Current License Renewal Topics

1. Generic Environmental Impact Statement (GEIS) Status Update

The staff informed NEI representatives of the status of the GEIS update and rulemaking. Public comments have been received and the public may view them on the Internet at <http://www.regulations.gov> (Docket ID NRC-2008-0608). In addition, the staff mentioned that several issues may need further public meeting and discussion, such as greenhouse gasses, refurbishment, employment trends, and the effective date of the final rule.

2. Status of License Renewal Interim Staff Guidance (LR-ISG)

- a. LR-ISG-2007-02, “Changes to Generic Aging Lessons Learned (GALL) Report Aging Management Program (AMP) XI.E6, ‘Electrical Cable Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements’”

The staff informed NEI representatives that the final LR-ISG was approved and a notice of availability was published in the *Federal Register* on December 23, 2009. The staff noted that the final LR-ISG includes a discussion on applicability of 10 CFR 50.109 and 10 CFR 54.37(b) to the LR-ISG, which follows the revised LR-ISG process issued in August 2009.

- b. LR-ISG-2009-01, “Staff Guidance Regarding Plant-Specific Aging Management Review and Aging Management Program for Neutron-Absorbing Material in Spent Fuel Pools”

The staff informed NEI representatives that it had published a request for public comment on the draft LR-ISG and that the public comment period closed on December 31, 2010. Comments were provided by NEI and industry stakeholders. The staff stated that it has evaluated the comments and is currently proceeding with the approval process for issuing the final LR-ISG.

3. Status of Draft Regulatory Issue Summary (RIS) 2007-16, Rev. 1, “Implementation of the Requirements of 10 CFR 54.37(b) for Holders of Renewed Licenses”

The staff stated that it has evaluated the industry’s position on implementation of 10 CFR 54.37(b) and, generally, the staff is satisfied with this position. The staff noted that the RIS is currently silent on replacement SSCs and more guidance may be necessary in this area. The staff informed the NEI representatives that discussions are being held with the NRC’s Office of the General Counsel to determine what guidance may be appropriate to issue in a revision to this RIS.

4. Status of Regulatory Information Conference

The staff presented the planned agenda for the license renewal technical session at the NRC Regulatory Information Conference. Copies of this agenda were provided as handouts at the meeting. The staff highlighted the topic related to NRC Inspection Procedure 71003, “Post-Approval Site Inspection for License Renewal.”

5. Atomic Safety and Licensing Board Order Allowing Safety Culture Contentions for License Renewal

The staff informed NEI representatives that the NRC's Atomic Safety and Licensing Board Panel admitted a contention concerning safety culture on the Prairie Island Nuclear Generating Plant license renewal application. The staff mentioned that this contention is unique because it is the first one concerning safety culture for license renewal.

6. Subsequent License Renewal User Needs

The staff stated that the NRC's Office of Nuclear Reactor Regulation recently sent a request to the Office of Nuclear Regulatory Research for assistance with evaluating the technical issues associated with subsequent license renewal application reviews. The staff explained that the Office of Nuclear Regulatory Research will use this user needs request for budgeting and planning purposes. The staff noted that one potential research area is on the effectiveness of current licensee programs for managing aging. The NRC staff indicated that it believes it is currently in the right place for subsequent license renewal applications, given the industry's indicated level of interest in submitting these types of applications.

7. New Topics

a. License Renewal Audits

The staff discussed some lessons learned from recent license renewal audits. The staff encouraged license renewal applicants to attend audits associated with other applications to gain experience with the process. The staff stated that it is considering two separate weeks for the aging management audits to reduce the audit team size and facilitate more system walk-downs. It is expected that this approach would have no effect on the overall renewal application review schedule.

b. Containment Liner Corrosion

As a means to evaluate corrosion of the containment liner, the staff stated that it is interested in information gained from inspections when the containment liner exterior surface is accessible. Such opportunistic inspections could provide insight as to the condition of the liner, including absence of corrosion, or extent of corrosion if corrosion is present. The NEI representatives stated that they were unsure of the best way to coordinate gathering this information, but suggested that EPRI may be an appropriate forum.

Public Participation

A member of the public asked for some clarifications concerning topics discussed during the meeting's afternoon session.

/RA

Matthew J. Homiack, General Engineer
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Division of License Renewal
Office of Nuclear Reactor Regulation

Enclosures:
As stated

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License Renewal Meeting between the U.S. Nuclear Regulatory Commission (NRC) Staff and the Nuclear Energy Institute to Discuss Generic Aging Lessons Learned Report Update and Current License Renewal Topics

February 24, 2010

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Julie Keys	Nuclear Energy Institute

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Steven Dolley*	Platts Nuclear
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Richard Conte*	NRC
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* Participated by teleconference

AGENDA

License Renewal Meeting between the U.S. Nuclear Regulatory Commission (NRC) Staff and the Nuclear Energy Institute to Discuss Generic Aging Lessons Learned (GALL) Report Update and Current License Renewal Topics

February 24, 2010

Morning Session: GALL Report Update (9:00 am to 12:00 pm)

Agenda Item	Lead	Start Time*
1. Introduction and Opening Remarks	NRC	9:00 am
2. Draft Aging Management Programs	NRC	9:15 am
a. XI.M9, "BWR Vessel Internals"		
b. XI.M11B, "Cracking of Nickel-Alloy Components and Loss of Material Due to Boric Acid-Induced Corrosion in Reactor Coolant Pressure Boundary Components (PWRS Only)"		
c. XI.M16, "PWR Vessel Internals"		
3. Comments on GALL Report Update	NEI	10:10 am
4. Near Term Milestones: Public Comment Period and Workshop	NRC	10:30 am
5. Performance of One-Time Volumetric Inspections of Socket Welds in Small-Bore Piping	NRC	10:35 am
6. Public Participation	All	11:15 am

Afternoon Session: Current License Renewal Topics (1:00 pm to 3:00 pm)

Agenda Item	Lead	Start Time*
1. Introduction and Opening Remarks	NRC	1:00 pm
2. Generic Environmental Impact Statement Status Update	NRC	1:15 pm
3. Status of License Renewal Interim Staff Guidance (LR-ISG)	NRC	1:30 pm
a. LR-ISG-2007-02, "Changes to Generic Aging Lessons Learned (GALL) Report Aging Management Program (AMP) XI.E6, 'Electrical Cable Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements'"		
b. LR-ISG-2009-01, "Staff Guidance Regarding Plant-Specific Aging Management Review and Aging Management Program for Neutron-Absorbing Material in Spent Fuel Pools"		
4. Status of Draft Regulatory Issue Summary 2007-16, Rev. 1, "Implementation of the Requirements of 10 CFR 54.37(b) for Holders of Renewed Licenses"	NRC	1:40 pm
5. Status of Regulatory Information Conference	NRC	1:50 pm
6. Atomic Safety and Licensing Board Order Allowing Safety Culture Contentions for License Renewal	NRC	2:00 pm
7. Subsequent License Renewal User Needs	NRC	2:15 pm
8. New Topics	NRC / NEI	2:30 pm
9. Public Participation	All	2:45 pm

* Start times are approximate