

February 6, 2007

Mr. Alexander Marion  
Nuclear Energy Institute  
1776 I Street, NW, Suite 400  
Washington, DC 20006-3708

SUBJECT: SUMMARY OF THE 2001- 2005 INTERIM STAFF GUIDANCE FOR LICENSE  
RENEWAL

Dear Mr. Marion:

In a teleconference between the U.S. Nuclear Regulatory Commission (NRC) and the Nuclear Energy Institute (NEI) held on October 23, 2006, NEI requested that the staff's resolution associated with the license renewal interim staff guidance (LR-ISG) for 2001-2005 be available on the NRC website for industry use. Enclosed for your information is the Summary of the 2001-2005 LR-ISG. In addition, the staff will post this summary on the NRC website.

If you have any questions regarding this matter, please contact Ms. Linh Tran of my staff at 301-415-4103 or via e-mail at [int@nrc.gov](mailto:int@nrc.gov).

An identical letter was sent to Mr. David Lochbaum at the Union of Concerned Scientists.

Sincerely,

*/RA/*

Pao-Tsin Kuo, Acting Director  
Division of License Renewal  
Office of Nuclear Reactor Regulation

Enclosure:  
As stated

cc: See next page

February 6, 2007

Mr. David Lochbaum  
Union of Concerned Scientists  
1707 H Street, NW, Suite 600  
Washington, DC 20006-3919

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Office of Nuclear Reactor Regulation

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**ADAMS Accession Nos: ML063610002**

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OFFICE	LA:DLR	PM:DLR	OGC	BC:RLRB	(A)D:DLR
NAME	SFiguroa	LTran	SHamrick w/nlo	RAuluck	PTKuo
DATE	12/27/06	12/27/06	01/24/07	01/12/07	02/6/07

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**Summary of the 2001- 2005 License  
Renewal Interim Staff Guidance  
(LR-ISG)**

<b>Item No.</b>	<b>Purpose/ Description</b>	<b>Position ISG No. and Title</b>	<b>Status Resolution</b>	<b>Affected License Renewal Guidance Documents (LRGDs)</b>
01	How to credit plant programs and activities	Clarification  ISG-01, "Proposed Staff Guidance on the Position of the GALL Report Presenting One Acceptable Way to Manage Aging Effects for License Renewal," dated November 23, 2001 (ADAMS Accession No. ML013300531)	Closed  Incorporated in LRGDs	SRP-LR, Chapter 3.0
02	Station blackout scoping  Add station blackout scoping	Compliance  ISG-02, "Staff Guidance on Scoping of Equipment Relied on to Meet the Requirements of the Station Blackout (SBO) rule (10 CFR 50.63) for License Renewal", dated April 1, 2002 (ADAMS Accession No. ML020920464)	Closed  Incorporated in LRGDs	SRP-LR, Chapter 2.0
03	Concrete aging management program  To clarify the concrete aging management programs in GALL and SRP-LR documents	Clarification  ISG-03, "Proposed Revision of Chapters II and III of Generic Aging Lessons Learned (GALL) Report on Aging Management of Concrete Elements," dated November 23, 2001 (ADAMS Accession Nos. ML013300440 and ML013300445)	Closed  Incorporated in LRGDs	GALL Volume 2, AMP XI.S2 and AMP XI.S6
04	Fire Protection System Piping  To clarify AMP XI.M26 and AMP XI.M27	Clarification  ISG-04, "Interim Staff Guidance (ISG)-04: Aging Management of Fire Protection Systems for License Renewal," dated December 3, 2002 (ADAMS Accession No. ML023440123)	Closed  Incorporated in LRGDs	GALL Volume 2, AMPs XI.M26 and AMP XI.M27

Enclosure

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05	<p>Electrical Fuse Holder</p> <p>To include fuse clips and fuse block for fuse holders and to add a new AMP for fuse clips (i.e., metallic)</p>	<p>Compliance</p> <p>ISG-05, "Interim Staff Guidance (ISG)-5 on the Identification and Treatment of Electrical Fuse Holders for License Renewal," dated March 10, 2003 (ADAMS Accession No. ML030690492)</p>	<p>Closed</p> <p>Incorporated in LRGDs</p>	<p>SRP-LR, Table 2.1-5, GALL Volume 2, and AMP XI.E5 (new)</p>
06	<p>Housing for active components</p> <p>To clarify a need for aging management review (AMR) for housing for fans, dampers, and H/C coils</p>	<p>Compliance</p> <p>ISG-06, "Proposed Interim Staff Guidance on Identification and Treatment of Housing for Active Components for License Renewal," dated April 8, 2003 (ADAMS Accession No. ML031010423)</p>	<p>Withdrawn and Closed</p> <p>Incorporated in LRGDs (included in NEI 95-10, Rev. 5)</p>	<p>SRP-LR, Table 2.1-5, Chapter 3.0, and GALL Volume 2, Table IX.B</p>
07	<p>Scoping guidance</p> <p>To clarify the fire protection systems, structures, and components scoping. To clarify whether the scope would expand to include (BTP) APSCB 9.5-1</p>	<p>Clarification</p> <p>Proposed Staff Guidance on the Scoping of Fire Protection Equipment for License Renewal, dated November 13, 2002 (ADAMS Accession No. ML023190479)</p>	<p>Closed - Staff concluded that ISG is not needed (see ADAMS Accession ML051590234)</p>	<p>N/A</p>
08	<p>The ISG Process</p> <p>To update and establish the interim staff guidance process</p>	<p>Clarification</p> <p>Process for Interim Staff Guidance Development and Implementation, dated December 12, 2003 (ADAMS Accession No. ML023520620)</p>	<p>Closed</p>	<p>N/A</p>

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09	<p>Scoping Criteria 54.4(a)(2)</p> <p>Scoping of non-safety related systems, structures, and components conducted for license renewal is in accordance with the requirement of 54.4(a)(2)</p>	<p>Clarification</p> <p>Industry Guidance on Revised 54.4(a)(2) Scoping Criterion for license renewal, dated June 6, 2003 (ADAMS Accession No. ML031570613)</p> <p>Draft Regulatory Guide (DG)-1140, Standard Format and Content for Applications to Renew Nuclear Power Plant Operating License, dated January 24, 2005 (ADAMS Accession No. ML050230010)</p>	<p>Closed - Issuance of Regulatory Guide 1.188, Revision 1, Endorsement of NEI-95-10, Revision 6</p>	<p>N/A</p>
10	<p>License Renewal Application Format</p> <p>To standardize license renewal application format for 2003 applicants</p>	<p>Clarification</p> <p>Standardized Format for License Renewal Application, dated April 7, 2003 (ADAMS Accession No. ML030990204)</p>	<p>Closed</p>	<p>N/A</p>

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11	<p>Environmental Fatigue for Carbon/Low-Alloy steel</p> <p>To review the aging management of environmental fatigue in the ISG process, as agreed at the September 18, 2002, meeting: eliminate evaluation of carbon and low alloy steel components for the effects of the reactor coolant environment for LRA.</p>	<p>Clarification</p> <p>Evaluation of Proposed Interim Staff Guidance (ISG)-11: "Recommendations for Fatigue Environmental Effects in a License Renewal Application," dated January 21, 2004 (ADAMS Accession No. ML040220124)</p>	<p>Closed</p> <p>Staff concluded there is insufficient technical basis provided to justify the elimination of the evaluation of carbon and low alloy steel components for the effects of the reactor coolant environment for LRA</p>	N/A
12	<p>Cracking of Class 1 small-bore piping</p> <p>To capture the operational experience related to the cracking of Class 1 small-bore piping</p>	<p>Clarification</p> <p>Proposed Interim Staff Guidance (ISG)-12: "Addition of Generic Aging Lessons Learned (GALL) Aging Management Program (AMP) XI.M35, 'One-time Inspection of Small-bore Piping,' for License Renewal," dated November 3, 2003 (ADAMS Accession No. ML033100516)</p>	<p>Withdrawn and Closed</p> <p>Incorporated in LRGDs</p>	GALL Volume 2, AMP XI.M35 (new) and corresponding AMR line items

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13	<p>The loose parts monitoring system</p> <p>To review the use of the loose parts monitoring (XI.M14) system for the management of the loss of preload on reactor vessel internal bolting</p>	<p>Clarification</p> <p>ISG-13</p>	<p>Withdrawn and Closed</p> <p>Incorporated in LRGDs -Remove pointer to AMP XI.M14 in the AMRs</p>	<p>GALL Volume 2, corresponding AMR line items</p>
14	<p>Cracking in Bolting</p> <p>To capture the operational experience related to the cracking of bolting</p>	<p>Clarification</p> <p>ISG-14</p>	<p>Withdrawn and Closed</p> <p>Incorporated in LRGDs -Revised GALL AMP XI.M18 and selected AMRs portion</p>	<p>GALL Volume 2, AMP XI.M18 and the corresponding AMRs line items</p>
15	<p>To incorporate NEI's proposed revision to GALL AMP XI.E2 (i.e., replaced TS surveillance with specific calibrations or surveillance)</p>	<p>Clarification</p> <p>ISG-15, "Proposed Interim Staff Guidance (ISG)-15: Revision of Generic Aging Lessons Learned (GALL) Aging Management Program (AMP) XI.E2, 'Electrical Cables Not Subject to 10 CFR 50.49 Environmental Qualification Requirements Used in Instrumentation Circuits', for License Renewal," dated August 12, 2003 (ADAMS Accession No. ML032250579)</p>	<p>Withdrawn and Closed</p> <p>Incorporated in LRGDs</p>	<p>GALL Volume 2, AMP XI.E2</p>
16	<p>To maximize the efficiency of the LRA review process and minimize RAIs using time-limited aging analyses (TLAA) supporting information</p>	<p>Clarification</p> <p>ISG-16, "Proposed Interim Staff Guidance (ISG)-16: Time-limited Aging Analyses (TLAAs) Supporting Information for License Renewal Applications" dated May 12, 2003 (ADAMS Accession No. ML031320798)</p>	<p>Withdrawn and Closed</p> <p>Incorporated in LRGDs</p>	<p>SRP-LR Chapter 4</p>



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17	<p>Bus ducts</p> <p>To review bus insulation due to water intrusion in bus ducts and bus bar connection due to thermal cycles; To develop GALL AMP XI.E4 for bus ducts</p>	<p>Clarification</p> <p>ISG-17, "Interim Staff Guidance (ISG)-17: Proposed Aging Management Program (AMP) XI.E4, 'Periodic Inspection of Bus Ducts', for License Renewal."</p> <p>See Federal Register Notice Vol. 69, No. 246, Page 76960, dated December 23, 2004.</p>	<p>Withdrawn and Closed</p> <p>Incorporated in LRGDs</p>	<p>GALL Volume 2, AMP XI.E4 (new) and corresponding AMR line items</p>
18	<p>Inaccessible cable</p> <p>To develop aging management procedure to prevent moisture collection in man hole and to revise GALL AMP XI.E3</p>	<p>Clarification</p> <p>ISG-18</p>	<p>Withdrawn and Closed</p> <p>Incorporated in LRGDs - revision to GALL AMP XI.E3</p>	<p>GALL Volume 2, AMP XI.E3</p>
19A	<p>Nickel-alloy</p> <p>Revise Aging Management Program XI.M11 to include nickel-alloy upper vessel heads (primary water stress corrosion cracking in nickel-alloy upper reactor vessel head penetration nozzles)</p>	<p>Clarification</p> <p>ISG-19A: "Proposed Aging Management Program XI.M11-A, 'Nickel-alloy Penetration Nozzles Welded to the Upper Reactor Vessel Closure Heads of Pressurized Water Reactors (PWRs Only)', for License Renewal."</p>	<p>Withdrawn and Closed</p> <p>Incorporate in LRGDs</p>	<p>GALL Volume 2, AMP XI.M11-A (new) and corresponding AMR line items</p>
19B	<p>Cracking of nickel-alloy components in the reactor coolant pressure boundary</p>	<p>Clarification</p> <p>ISG-19B, "Proposed Aging Management Program XI.M11-B, 'Nickel-alloy Base-metal Components and Welds in the Reactor Coolant Pressure Boundary', for License Renewal."</p>	<p>Open - On-hold until NEI and EPRI-MRP activities completed</p>	

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20	<p>Steam Generator Tube Integrity</p> <p>Revise aging management program XI.M19 to include steam generator tube integrity</p>	<p>Clarification</p> <p>ISG-20</p>	<p>Withdrawn and Closed</p> <p>Incorporated in LRGDs, Revision to XI.M19</p>	GALL Volume 2, AMP XI.M19
21	<p>Reactor Vessel Internals</p> <p>Revise Chapter IV tables, AMP XI.M9 and AMP XI.M16, to provide improved guidance on reactor vessel internals</p>	<p>Clarification</p> <p>ISG-21</p>	<p>Withdrawn and Closed</p> <p>Incorporated in LRGDs - Revision to AMP XI.M9 and deletion of AMP XI.M16; and corresponding AMR line items</p>	GALL Volume 2, AMP XI.M9 and corresponding AMR line items
22	<p>Lower Plenum Components</p> <p>To address thermal aging embrittlement of CASS components</p>	<p>Clarification</p> <p>An ISG is not needed</p>	<p>Closed</p> <p>Staff concluded that GALL adequately addressed this issue - no ISG is needed</p>	N/A
23	<p>Replacement Parts necessary to meet 10 CFR 50.48 (Fire Protection)</p> <p>To provide guidance on how to handle replacement parts for 10 CFR 50.48</p>		<p>Open</p> <p>To determine if an ISG is necessary</p>	

Letter to A. Marion, D. Lochbaum, from PTKuo, dated February 6, 2007

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Project No. 690

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