



NUCLEAR ENERGY INSTITUTE

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Mr. Christopher I. Grimes, Chief
License Renewal and Standardization Branch
Division of Regulatory Improvement Programs
U.S. Nuclear Regulatory Commission
Mail Stop 0-12-G15
Washington, DC 20555-0001

SUBJECT: License Renewal Issue No. 98-0100, "Crediting FERC-Required Inspection and Maintenance Programs for Dam Aging Management"

PROJECT NUMBER: 690

Dear Mr. Grimes:

This is a response to your May 5, 1999 letter that provided the NRC staff's proposed resolution of the question regarding the type of program that could be credited as a dam aging management program for license renewal.

It is the position of the NRC staff that the dam inspection and maintenance programs under the jurisdiction of FERC or the Army Corps of Engineers, continued through the period of extended operation, are adequate for purposes of aging management. The NRC staff also takes the position that programs not under the jurisdiction of FERC or the Army Corps of Engineers will be evaluated based on comparability to the common practices of the FERC and Corps programs. We agree with the NRC staff positions. We will update our guidance documents to reflect this agreement.

Further, the letter also states that a license renewal applicant must include a description of its dam inspection program in the Final Safety Analysis Report (FSAR) supplement pursuant to §54.21(d), if a description does not already exist. However, it is our view that since the inspections are under the jurisdiction of outside agencies, the FSAR supplement need only state that the licensee's inspection and maintenance program is in conformance with FERC or Corps requirements.

If you have any questions please call.

Sincerely,

Douglas J. Walters

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