

May 4, 2000

Mr. Douglas J. Walters
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Mr. David Lochbaum
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SUBJECT: DISPOSITION OF LICENSE RENEWAL ISSUE INVENTORY

Gentlemen:

During the March 8, 2000, meeting between the Nuclear Energy Institute (NEI) License Renewal Working Group and the NRC License Renewal Steering Committee, the staff was tasked to determine an appropriate disposition of the License Renewal Issues inventory. The ongoing activities associated with the review of the draft Generic Aging Lessons Learned (GALL) report and revision of the standard review plan for license renewal (SRP-LR) envelop almost all of the issues in the license renewal inventory and obviate the need to track these as stand alone items. Enclosure 1 provides the staff's evaluation of this action to appropriately disposition the inventory. Enclosure 2 provides a list of recently issued correspondence on specific issues and associated ADAMS Accession numbers.

We plan to continue developing guidance to address particular license renewal issues and lessons from the renewal review process, to the extent that resources are available and such separate efforts will facilitate GALL, SRP-LR and improvements to NEI 95-10. Accordingly, if there are any specific issues for which stakeholders need to have continuing dialogue outside of the GALL and SRP-LR review efforts, we request that you identify those specific issues in a written response to this letter. For example, we agreed to continue a separate dialog on the treatment of fatigue environmental effects and we are pursuing improvements to the guidance for scoping and screening.

We would appreciate that response within 30 days, so that we can plan and schedule those parallel efforts without impacting the GALL and SRP-LR schedules. If you have any questions regarding this matter, please contact Stephen Koenick at 301-415-1239.

Sincerely,

/RA/

Christopher I. Grimes, Chief
License Renewal and Standardization Branch
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Project 690
Enclosures: As stated
cc w/encl: See next page

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Disposition of License Renewal Issue Inventory

BACKGROUND

In September 1997, the NRC issued Draft Standard Review Plan for the Review of License Renewal Application for Nuclear Power Plants (SRP-LR). The principle purposes of the SRP-LR are to assure quality and uniformity of staff reviews and to present a well-defined base from which to evaluate applicants programs and activities for the period of extended operation. The License Renewal Issues (LRI) inventory originated from industry comments on the September 1997 draft SRP-LR. The intent of the inventory was to provide a medium to track and resolve the stakeholder comments and incorporate resolutions into subsequent revisions of the SRP-LR.

Considerable amount of resources have been committed to resolving this inventory with mixed results. Of the population of 106 issues, 11 issues were resolved and 5 were deleted. Of the remaining inventory, varying progress was made on a number of issues that were placed on the Active Issues List. This list was established to provide a prioritization scheme for the inventory to allow for the staff and stakeholders to better focus resources. This effort has yielded several staff positions and subsequent stakeholder responses.

Concurrent to this effort, the staff has been developing the Generic Aging Lessons Learned (GALL) Report. The GALL report represents a generic evaluation to document which existing programs should be augmented for license renewal and which programs adequately manage aging effects without change. The GALL Report will serve as the basis for the SRP-LR, which also being revised. To the extent practical, the staff positions developed for the resolution of specific license renewal issues have been incorporated into the GALL Report and SRP-LR. Both are scheduled to be formally issued in August 2000 as draft for public comment.

A working draft of the GALL Report was made publicly available following its introduction at an NRC sponsored workshop held in December 1999. This effort is being pursued to allow for early stakeholder participation in GALL development activities. The SRP-LR is going to follow a similar path as it becomes available.

DISCUSSION

The LRI inventory largely resulted from the September 1997 version of the SRP-LR. This document is being substantially revised drawing on the GALL Report for its basis of acceptability. To date two applications have proceeded through the review process resulting in the issuance of the Calvert Cliffs licenses for extended operation and the issuance of the Safety Evaluation Report for the Oconee Nuclear Station, the latter application review is proceeding according to schedule. Both of these review activities were considered during the development of the GALL Report. In addition, staff positions developed during license renewal issue activities were also factored into the GALL Report and the revision to the SRP-LR.

The LRI inventory has been superceded by these review activities. The pursuit of the aggressive August release dates effectively become the focus of resources and priority. To the extent practical, staff positions that have been developed have been and will continue to be

factored into the GALL and SRP-LR review efforts. By not only issuing the GALL Report and SRP-LR in draft form for public comment in August 2000, but providing a forum for early stakeholder input, there is ample opportunity for the stakeholders to provide comments on the guidance documents. If the previously identified license renewal issues were not resolved, the interested stakeholders can redefine or clarify the issues as they relate to the revised documents.

CONCLUSION

The staff has concluded that the LRI Inventory can be archived. This decision was based on the following:

- Development of the GALL Report, which includes experience gained from the first two license application review processes;
- Major revision to the September 1997, draft SRP-LR, which the LRI inventory was largely based;
- Aggressive schedule of August 2000 for issuance of the GALL Report and SRP-LR for public comment;
- Public release of working drafts of both reports to allow for early stakeholder participation in GALL development activities; and
- Staff positions on license renewal issues have been incorporated into these two documents.

NUCLEAR ENERGY INSTITUTE

Project No. 690

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