

May 4, 2000

Mr. Douglas J. Walters
Nuclear Energy Institute
1776 I Street, NW., Suite 400
Washington, DC 20006-3708

Mr. David Lochbaum
Union of Concerned Scientists
1616 P. St., NW, Suite 310
Washington, DC 20036-1495

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

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OFFICE	LA	RLSB	RLSB:SC	RLSB:C
NAME	Ehylton*	Skoenick*	PTKuo*	CGrimes 
DATE	04/ 17 /00	04/ 17 /00	04/ 19 /00	05/ 4/00

*See previous concurrence

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A. Murphy

W. McDowell

S. Droggitis

RLSB Staff

A. Thadani

M. Federline

C. Julian

R. Gardner

D. Chyu

M. Modes

J. Vora

N. Dudley, ACRS - T2E26



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

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Nuclear Energy Institute
1776 I Street, NW., Suite 400
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NUCLEAR ENERGY INSTITUTE

Project No. 690

cc:

**Mr. Dennis Harrison
U.S. Department of Energy
NE-42
Washington, D.C. 20585**

**Mr. Robert Gill
Duke Energy Corporation
Mail Stop EC-12R
P.O. Box 1006
Charlotte, NC 28201-1006**

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

**Mr. Charles R. Pierce
Southern Nuclear Operating Co.
40 Inverness Center Parkway
BIN B064
Birmingham, AL 35242**

**Mr. Douglas J. Walters
Nuclear Energy Institute
1776 I Street, N.W., Suite 400
Washington, DC 20006-3708
DJW@NEI.ORG**

**Chattooga River Watershed Coalition
P. O. Box 2006
Clayton, GA 30525**

**National Whistleblower Center
3238 P Street, N.W.
Washington, DC 20007-2756**

**Mr. David Lochbaum
Union of Concerned Scientists
1616 P. St., NW
Suite 310
Washington, DC 20036-1495**

**Mr. Garry Young
Entergy Operations, Inc.
Arkansas Nuclear One
1448 SR 333 GSB-2E
Russellville, Arkansas 72802**

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.

Recently Issued Correspondence Related to License Renewal Issues

License Renewal Issue No: 99-0105

Letter To: D. Walters, NEI
From: C. Grimes, NRC
Dated: 11/19/1999
Subject: License Renewal Issue No. 98-0105, "Heat Exchanger Heat Transfer Function"

Summary: The letter contains the staff's evaluation and proposed resolution of the subject issue. The staff concluded that the proposed position as stated in SRP-LR Section 3.0.III.C is consistent with the rule. However, the clarification of the distinction between the pressure boundary and heat transfer functions, as well as the distinction between the primary and secondary heat transfer functions should be added to the SRP-LR as well as to NEI 95-10.

Accession No: ML9933500720

License Renewal Issue No: 98-0085

Letter To: D. Walters, NEI
From: C. Grimes, NRC
Dated: 12/03/1999
Subject: License Renewal Issue No. 98-0085, "Reactor Vessel Surveillance Program"

Summary: The letter contains the staff's evaluation and proposed resolution of the subject issue. The reactor vessel material surveillance program requirements vary with the plant vintage. Appendix H of 10 CFR Part 50 requires the surveillance program and withdrawal schedule to meet the requirements of the edition of ASTM E185 that is current on the issue date of the ASME Code to which the reactor was purchased. Later editions of ASTM E185 may be used, but including only those editions through 1982. Surveillance programs earlier than ASTM E185-73 did not require standby capsules, and therefore, there may be no capsules remaining in the surveillance program after the current operating term. Surveillance programs later than ASTM E185-73 required standby capsules and that one capsule be withdrawn and tested at a neutron fluence equivalent to the design life of the reactor vessel.

The staff concludes that the existing surveillance program, with the modifications summarized in the staff position, is acceptable for managing the neutron embrittlement and thermal aging of the reactor vessel materials. The applicable Regulatory Guide 1.99, Rev. 2, "Radiation Embrittlement of Reactor Vessel Materials." The guidance in Section 4.1.II.A.2 of the draft SRP-LR will be revised to include this guidance.

Accession No: ML9934202380

License Renewal Issue No: 98-0100

Letter To: C. Grimes, NRC
From: D. Walters, NEI
Dated: 12/15/1999
Subject: License Renewal Issue No. 98-0100, "Crediting FERC-Required Inspection and Maintenance Programs for Dam Aging Management"

Summary: This letter provides NEI's response to the NRC staff position contained in a letter to NEI dated May 5, 1999. NEI is in agreement with staff position in that FERC and Army Corps of Engineers have adequate dam inspection and maintenance programs. Furthermore, for programs not under either's jurisdiction, the programs would be evaluated against comparable criteria. NEI committed to update NEI 95-10, accordingly.

However, NEI feels that if the inspections are under the jurisdiction of outside agencies, then a specific description of the program in the FSAR supplement is unwarranted and that the supplement should only acknowledge that the program is in conformance with FERC or Corps requirements.

Accession No: ML0037017980

Enclosure 2

License Renewal Issue No: 98-0102

Letter To: C. Grimes, NRC
From: D. Walters, NEI
Dated: 01/18/2000
Subject: License Renewal Issue No. 98-0102, "Screening Equipment That is Kept in Storage"

Summary: This letter provides NEI's response to the NRC staff position contained in a letter to NEI dated February 11, 1999. NEI disagrees with the staff position that the equipment must be subject to an aging management review. NEI states that the equipment is part of the current licensing basis and must be available to perform its intended function. While no specific generic guidance exists for maintaining and inspecting equipment to ensure availability, licensees do perform inspections, tests, and maintenance activities to ensure equipment will perform its intended function when called upon to do so. In license renewal space, NEI considers that the equipment is considered active and not subject to an AMR

Accession No: ML0037018840

License Renewal Issue No: 98-0012

Letter To: NEI
From: S. Koenick, NRC
Dated: 01/21/2000
Subject: Summary of December 8, 1999, meeting on LR 98-12, "Consumables"

Summary: This letter provides the December 8, 1999, meeting summary. Specific treatment of each commodity group was provided. A letter with proposed guidance to be incorporated into the SRP will be developed. Basically, with the exception of oils, grease, and filters, each commodity group meets the 54.21(a)(1)(i) screening criteria; however, could be excluded by information contained in the summary. As for the oils, grease, and filters category, they are considered consumables and are excluded based on being short-lived and periodically replaced.

Accession No: ML0036766891

License Renewal Issue No: 99-0104

Letter To: D. Walters, NEI
From: C. Grimes, NRC
Dated: 02/01/2000
Subject: License Renewal Issue No. 98-104, "Acceptance Review of LRAs"

Summary: The letter contains the staff's evaluation and proposed resolution of the subject issue. The staff position provides specific guidance to be included in the revision to Section 1.1 of the SRP to include lessons learned resulting from the first two license renewal applications.

Accession No: ML0036794930

License Renewal Issue No: 98-0012

Letter To: D.Walters, NEI
From: C.Grimes, NRC
Dated: 03/10/2000
Subject: License Renewal Issue No. 98-12, "Consumables"

Summary: The letter contains the staff's evaluation and proposed resolution of the subject issue. The NRC staff position on the proper disposition of consumables was to divide the broad term on consumables into 4 types of commodity groups and provides guidance as to whether the commodity group meets the criteria contained in 10 CFR 54.21(a)(1)(i).

Accession No: ML003691666

License Renewal Issue No: 98-0051

Letter To: D.Walters, NEI

From: C.Grimes, NRC

Dated: 03/06/2000

Subject: License Renewal Issue No. 98-51, "Evaluation of jurisdiction of ASME Section XI, IWE & IWF, for License Renewal"

Summary: The letter contains the staff's evaluation and proposed resolution of the subject issue. The NRC staff position is that the staff is in agreement with NEI in that ASME Section XI, Subsection IWF should be added to applicable sections of the SRP as acceptable aging management of component supports for "loss of material" in the draft SRP.

Accession No: ML0036894570