

May 24, 2000

ORGANIZATION: Nuclear Energy Institute (NEI)

SUBJECT: SUMMARY OF MEETING WITH THE NUCLEAR ENERGY INSTITUTE (NEI) TO DISCUSS THE RELATIONSHIP BETWEEN THE GENERIC AGING LESSONS LEARNED (GALL) REPORT AND THE STANDARD REVIEW PLAN FOR LICENSE RENEWAL (SRP-LR)

On May 15, 2000, representatives of NEI met with the Nuclear Regulatory Commission (NRC) staff in Rockville, Maryland, to discuss the relationship between the GALL report and the SRP for license renewal. A list of meeting attendees is contained in Enclosure 1. Enclosure 2 contains handouts provided by NEI during the meeting.

Prior to the meeting the staff issued 2 documents that were discussed at the meeting. The documents were the following: a letter to Douglas Walters from Christopher Grimes dated February 3, 2000, titled, "Generic Aging Lesson Learned (GALL) Report and Standard Review Plan Guidance for License Renewal (SRP-LR)," and the draft "Standard Review Plan for the Review of License Renewal Applications for Nuclear Power Plants," dated April 21, 2000.

NEI stated that the purpose of the meeting was to discuss the relationship and alignment of three documents: NEI 95-10, the SRP-LR, and the GALL report. NEI stated that it did not believe that the standard application format, the SRP-LR and GALL reports were in alignment. NEI believes that the GALL report should be used similar to the way the generic environmental impact statement (GEIS) is used for the 10 CFR Part 51 review. The staff did not agree that this analogy was appropriate and believes there are fundamental differences between the way the GALL report will be used and the way the GEIS has been used. Specifically, the staff believes the GALL report should be treated in the same manner as an approved topical report. The staff stated that it should not repeat its review of the matters described in the GALL report and should find it acceptable when the GALL report is referenced in a license renewal application. However, the staff stated it would ensure that the material presented in the GALL report is applicable to the specific plant involved. The staff would also verify that the applicant has identified specific programs as described and evaluated in the GALL report.

NEI raised a concern that the GALL report would be used as a checklist by the staff during its review of a license renewal application. The staff disagreed with NEI's contention. The staff believes that the GALL report is a reference. The staff stated that guidance for how the GALL report should be used in reviewing a license renewal application belongs in the SRP for license renewal. The staff stated that if NEI was concerned about the staff using the GALL report incorrectly it should suggest a language change for the SRP, and not for the GALL report. NEI also indicated that the current GALL report was inefficient for the program reconciliation. NEI recommended a new GALL chapter as a repository for program evaluations and proposed a reformatting of GALL. Enclosure 2 contains an example that NEI provided for the containment

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spray system. There are 6 columns in NEI's example, as opposed to 4 columns in the February 3, 2000, letter from the staff. NEI believes the new format would allow flexibility to apply programs to similar plant systems not evaluated in GALL and that reconciliation to specific systems and components was not necessary.

The staff also stated that NEI should concentrate on the simplest way to resolve the issues and to attempt to resolve as many issues as possible between now and August of this year. The staff noted that it would not try to resolve all license renewal issues with the GALL report. Rather, the staff believes the GALL report should be used to reduce the workload of the applicants and the staff as much as possible. That is, the GALL report should be used to document the bulk of the components, aging effects, and aging management programs that do not need to be changed as a result of license renewal. If NEI still believes that the draft GALL report needs to be reformatted the staff would consider working on the reformatting during the public comment period for the draft GALL report after August.

The staff stated that it would like a response to its February 3, 2000, letter as soon as possible. The staff noted that when it receives the comments from NEI it will determine how much of the comments it can resolve and incorporate into the August version of the draft GALL report. NEI stated that it believed it could provide the staff with 90 percent of its comments by the end of May. NEI questioned the staff's long term plan for updating the GALL report. The staff stated that before it updates the GALL report it would determine the cost and benefit of the update.

/RA/

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License Renewal and Standardization Branch
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Project No. 690

Enclosures: As stated

cc: See next page

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NRC MEETING WITH THE NUCLEAR ENERGY INSTITUTE
ON LICENSE RENEWAL
ATTENDANCE LIST
MAY 15, 2000

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Project No. 689

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NEI/NRC Meeting On GALL/SRP

May 15, 2000

Enclosure 2





Purpose Of Meeting

Discuss Relationship and Alignment of
NEI 95-10/Standard Review
Plan/GALL





Application Format and Content

- Application Chapter 2
 - Plant scoping/screening process and results
- Application Chapter 3
 - Integrated Plant Process
- Application Chapter 4
 - Time Limited Aging Analyses



Standard Application Format and the SRP/GALL

- Application Chapter 2
 - Plant scoping/screening process and results
- Application Chapter 3
 - Integrated Plant Assessment
 - Implies starting with SCs in GALL
- Conclude documents are not in alignment.

Aligning The Documents

- Clearly define the purpose and use of GALL
- Revise NEI 95-10/Standard Application format to incorporate the use of GALL
- Revise the SRP to reflect updated NEI 95-10





Purpose of GALL

- Purpose of GALL
 - Topical report and SER on acceptable aging management programs
 - Provide generic evaluation of aging management programs
 - Provide linkage between information in the application and program evaluations

Purpose of GALL

- **GALL is NOT:**
 - A checklist of all the components subject to an aging management review
 - A checklist of all the aging effects subject to an aging management review
 - A checklist of required aging management programs
 - The starting point for reviewing the Integrated Plant Assessment

Observations/ Recommendations

- Existing GALL is inefficient for the program reconciliation
- Create a new GALL chapter as a repository for program evaluations



Features of New Chapter

- Each program evaluated once
- Focus on materials, environment, aging effects – not systems and components
- Reference applicable GALL sections

Features of New Chapter

- Allows flexibility to apply programs to similar plant systems not evaluated in GALL
- Reconciliation to specific systems and components not necessary.

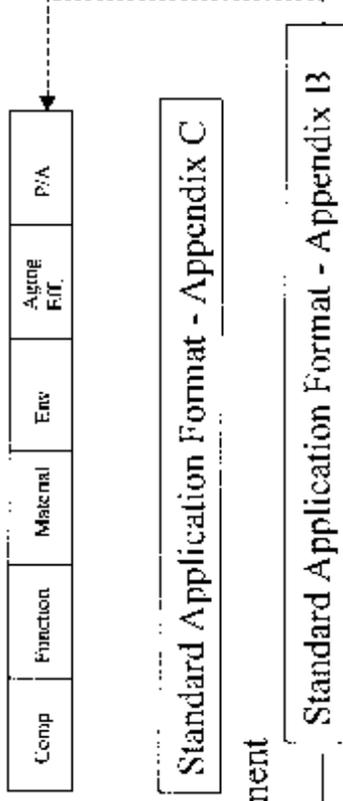
USE OF GALL

EXAMPLE

3.3 ESF

3.3.1 Containment Spray

- Introduction
- Material
- Environments
- Aging effects requiring management
- Programs and activities
- Demonstration



Standard Application Format - Appendix B

- Evaluation of Programs and activities