

October 30, 2000

Mr. Ernest Goitein, P.E.  
167 Almedral Avenue  
Atherton, California 94027

Dear Mr. Goitein:

Thank you for your comments on the Generic Environmental Impact Statement for License Renewal of Nuclear Plants (NUREG-1437 Vol. 1).

The Atomic Energy Act established a 40-year license term for power reactors, but also provided that such licenses could be renewed. Public comment was sought when the regulations were amended in 1991 and 1995 to include a process for renewal in Part 54 of Title 10 of the Code of Federal Regulations. Public comment was also sought when the associated environmental impact requirements in Part 51 were amended for license renewal in 1996.

The license renewal requirements provide for a plant-specific determination that aging effects can be adequately managed during the period of extended operation. The Nuclear Regulatory Commission (NRC) is currently seeking public comment on updated guidance for the evaluation of plant-specific applications for license renewal, including a report on generic aging lessons learned. Recent media reports erroneously described this guidance as the only opportunity for public comment for license renewal. The NRC requested comments on the updated renewal guidance by October 16, 2000, in preparation for a meeting of the Commission planned for December 4, 2000, to specifically discuss the extent to which existing inspection and maintenance activities need to be augmented for license renewal.

Comments on the license renewal guidance submitted after that date will be considered to the extent practical up to the time the proposed final guidance is submitted to the Commission for approval, presently scheduled for March 2001.

The license renewal process provides for individual hearings, public meetings and a request for public comment in the vicinity of each plant that submits a license renewal application.

In addition to its mission of protecting public health and safety under the Atomic Energy Act, the NRC is charged with protection of the environment in the use of nuclear materials. Each license renewal applicant must include a supplement to the environmental report which contains an analysis of the plant's impact on the environment if allowed to continue operation beyond the initial license. The NRC performs plant-specific reviews of environmental impacts of operating life extension in accordance with National Environmental Policy Act (NEPA), as implemented by the requirements of 10 CFR Part 51, "Environmental Protection Regulations for Domestic Licensing and Related Regulatory Functions." This review continues on a separate "track" from the safety reviews of the technical information. Environmental requirements for the renewal of power reactor operating licenses are contained in NRC's regulations, 10 CFR Part 51. The environmental protection regulations in 10 CFR Part 51 were revised on December 18, 1996, to improve regulatory efficiency in environmental reviews for license renewal and codify the findings documented in the Generic Environmental Impact Statement for License Renewal of Nuclear Plants, (NUREG-1437).

The Generic Environmental Impact Statement (GEIS) examines the possible environmental impacts that could occur as a result of renewing any commercial nuclear power plant license, and, to the extent possible, establishes the bounds and significance of these potential impacts. For each type of environmental impact, the GEIS attempts to establish generic findings. While plant and site-specific information is used in developing an envelope of generic findings, the NRC does not intend for the GEIS to be a compilation of individual plant environmental impact statements. Instead, this report may be incorporated, by an applicant, into a license renewal application environmental report. The GEIS makes maximum use of environmental and safety documentation from original licensing proceedings and information from state and Federal regulatory agencies, the nuclear utility industry, the open literature, operating experience, and professional contacts. It allows the applicant to concentrate on those impacts that must be evaluated on a plant-specific basis. Information provided on the plant specific issues will either disposition the issue as not applicable or present an analysis of the issue using site-specific information. Mitigation and alternatives to reduce adverse impacts must also be discussed. This approach, the use of a generic environmental impact statement with a plant-specific supplement, improves the efficiency of the licensing process.

A scoping process is conducted to define the proposed action, to determine the scope of the EIS and identify the significant issues to be analyzed in depth. A public scoping meeting is held near the nuclear plant seeking license renewal. Based on this process and the staff's independent review, the NRC will issue a preliminary recommendation on the acceptability of a license renewal action with regard to environmental impact. A draft plant-specific supplement to the GEIS is released for public comment and public meetings in the local community of the plant are then held to discuss the findings. After comments are addressed, the NRC publishes a final plant-specific supplement to the GEIS and provides a final recommendation regarding the environmental affects with respect to the license renewal application to the Commission. Transcripts of environmental scoping meetings and public meetings on the draft supplements related to license renewal are available through the NRC Public Document Room.

Additional information about the license renewal process and related evaluation guidance is available on the NRC webpage at <<http://www.nrc.gov/NRC/REACTOR/LR/index.html>>.

Sincerely,

***/RA/***

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

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Sincerely,

**/RA/**

Christopher I. Grimes, Chief  
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 Division of Regulatory Improvement Programs  
 Office of Nuclear Reactor Regulation

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