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October 16, 2000

David L. Meyer  
Division of Administrative Services  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

**Re:** Comments on Draft Regulatory Guide DG-1104, Draft Standard Review Plan for the Review of License Renewal Applications for Nuclear Power Plants, and Draft Generic Aging Lessons Learned Report

Received by Mr. L. Meyer  
October 15, 2000  
10:37 AM '00

Dear Ms Vietti-Cook:

In an August 31, 2000, *Federal Register* notice (65 Fed. Reg. 53,047), the Nuclear Regulatory Commission announced the availability of, and provided an opportunity to comment on, draft Regulatory Guide DG-1104, "Standard Format and Content for Applications to Renew Nuclear Power Plant Operating Licenses," the draft Standard Review Plan for the Review of License Renewal Applications for Nuclear Power Plants" (SRP-LR), and the draft Generic Aging Lessons Learned (GALL) Report. As an active participant in the nuclear industry's license renewal efforts, Winston & Strawn appreciates the opportunity to provide comments on these proposed regulatory guidance documents.

Winston & Strawn has been involved in the activities of the Nuclear Energy Institute (NEI) related to the development of these guidance documents. We also are familiar with the extensive and well-researched comments prepared by NEI concerning these license renewal guidance documents, and we endorse those NEI comments. In addition, we offer the following observations and comments with respect to the GALL Report and its use by license renewal applicants.

The underlying purpose of the GALL is to bring additional efficiencies to the license renewal process by avoiding repetitious reviews of existing aging management programs. In general, it was contemplated that descriptions of aging management programs would be included in the GALL and referenced by future license renewal applicants, thereby eliminating the need for duplicative reviews of equivalent programs. It is important that the GALL Report's purpose be preserved, and that it not be transformed into an aging management program review template.

Template - Adm-013

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ERIDS.03  
Add Raj Anand (RKA)  
Steve Koenick (SSKA)

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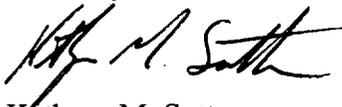
David L. Meyer  
October 16, 2000  
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In particular, license renewal applicants who elect to use the GALL Report should not be required to perform an actual or *de facto* certification of their aging management programs against the program descriptions and attributes set forth in the document. Nor should there be any required "mapping" between aging effects addressed in a license renewal application versus the GALL Report. Instead, the GALL Report should only be treated as a reference tool, both by applicants and the NRC Staff.

In order to ensure that the GALL Report is used correctly, we strongly urge the Staff to better define, in the document, how it is to be used by license renewal applicants. We believe that it is most important to explain that a license renewal applicant's aging management program need not be identical to that described in the GALL Report in order to take credit for the conclusions reached in the report. The NRC Staff will need to recognize the plant-specific differences in aging management programs and rely on the GALL Report in a flexible manner. A reasonable level of deviation from the program descriptions in the GALL Report should be anticipated and accommodated by the Staff.

We appreciate the opportunity to comment on this significant regulatory guidance. If you have any questions, please feel free to contact me at (202) 371-5738.

Sincerely,



Kathryn M. Sutton

KMS:mlf