

December 4, 2000

Mr. Anthony R. Pietrangelo
Director, Risk and Performance Based Regulation
Nuclear Energy Institute
1776 I Street, Suite 400
Washington, D.C. 20006

Dear Mr. Pietrangelo:

We are responding to your October 20, 2000, letter that provided a schedule of expected risk-informed inservice inspection (RI-ISI) submittals and need dates and requested NRC feedback on the likelihood that we can process the expected number of applications on the schedules reflected in your letter.

Along with completion of the RI-ISI regulatory guide and standard review plan, the staff completed and issued safety evaluations (SE) on the Westinghouse Owners Group (WOG) and Electric Power Research Institute (EPRI) methodologies. The staff has also reviewed and approved pilot plant applications that implemented these methodologies. As discussed in your letter, the industry and staff cooperated in developing templates for RI-ISI submittals to facilitate the review and approval of subsequent RI-ISI submittals. It should be noted that even with the use of template submittals, the staff performs sufficient review to gain confidence that the analysis done to support the submittal is understood and is sufficient to support a finding of reasonable assurance. We agree with your understanding that a plant using the template, and taking no exceptions to one of the two approved methodologies, should receive the staff approval in approximately three months. However, our experience has been that, in most cases, the licensees have taken some exceptions to the approved methodology resulting in more extensive reviews and hence longer review schedules. It does not appear that the licensees are taking full advantage of experience developed during prior successful evaluations to simplify the analysis and review of subsequent submittals.

Enclosure 1 to your letter provides a schedule of expected submittals, submittal dates, and need dates for submittals in the final quarter of this year and next year. Of these, the staff has completed the review and issued SEs for nine plants and is currently reviewing submittals for nine other plants. Your letter indicates that an additional 11 plants need their RI-ISI program approvals during the first quarter of 2001 and ten during the second quarter of 2001. In the third quarter of 2001, three plants need approval and in the fourth quarter, two plants need approval of their RI-ISI programs. There are four plants that need approval in 2002 and two have unspecified dates for program approvals. The staff acknowledges that the list may not be complete and that some plants not included in the list might submit RI-ISI programs.

We also note from Enclosure 1, that some licensees plan a submittal only three months before the need date (e.g., McGuire) and other licensees plan a submittal over six months before the need date (e.g., Quad Cities). Licensees with a shorter review interval are encouraged to accelerate their submittal to allow for contingencies.

We would like to point out that our past experience has been that plants have not been submitting their RI-ISI programs for approval according to schedules informally provided to us by the major RI-ISI vendors. We have been receiving fewer plant submittals than anticipated. For most of the submittals that have followed an approved methodology with minimal deviations, we have met the approval schedules requested by the licensees. In addition, we expect to meet the schedule for all the submittals that are currently under review as long as the licensees respond in a timely and satisfactory manner to outstanding staff issues regarding the implementation of the RI-ISI methodologies. Whether we can meet the schedule for future submittals depends on the extent to which these submittals deviate from the approved topical report methodologies. Our intent is to utilize available resources along with NRC contractor help, if needed, to continue to meet the schedule needs of the licensees.

We agree with the contingency plan pointed out in your letter to review and grant relief of up to two years if this becomes necessary for individual licensees. The staff recommends that these relief requests not be included with the application; they should be submitted only in cases when the staff concludes that it will not be able to meet the licensee's schedule requirements. Regarding our comments on the template for the language in such relief requests as suggested in Enclosure 3 of your letter, we suggest a meeting with our staff to discuss the items that need to be included.

The staff has been meeting with the industry (WOG and EPRI) regarding additional generic developments, such as application of RI-ISI to high energy line break (HELB) piping. The staff intends to further discuss its plan with WOG and EPRI to develop and implement such applications. As indicated in your Enclosure 1, the industry has an aggressive schedule for submittal of RI-ISI programs during the remainder of this year and the first half of next year. The staff believes that the reviews of these submittals should have a higher priority and hence limited staff resources might impact the review of extending the generic application of the risk-informed methodology to new applications.

In summary, the staff has been meeting the licensees' requested schedules for the reviews of the RI-ISI submittals that have been completed. We also expect to meet the schedules for the submittals currently under review and the requested schedules for future submittals. This, of course, is contingent upon the licensees taking no exceptions to the approved methodologies and responding in a timely and satisfactory manner to outstanding staff issues regarding the implementation of the RI-ISI methodologies.

We look forward to continuing to work with the industry as we progress through the implementation of RI-ISI programs at various plants. If you need further information, please contact Syed Ali (301-415-2776) of my staff.

Sincerely,

/ra/

Brian W. Sheron, Associate Director
for Project Licensing and Technical Analysis
Office of Nuclear Reactor Regulation

We would like to point out that our past experience has been that plants have not been submitting their RI-ISI programs for approval according to schedules informally provided to us by the major RI-ISI vendors. We have been receiving fewer plant submittals than anticipated. For most of the submittals that have followed an approved methodology with minimal deviations, we have met the approval schedules requested by the licensees. In addition, we expect to meet the schedule for all the submittals that are currently under review as long as the licensees respond in a timely and satisfactory manner to outstanding staff issues regarding the implementation of the RI-ISI methodologies. Whether we can meet the schedule for future submittals depends on the extent to which these submittals deviate from the approved topical report methodologies. Our intent is to utilize available resources along with NRC contractor help, if needed, to continue to meet the schedule needs of the licensees.

We agree with the contingency plan pointed out in your letter to review and grant relief of up to two years if this becomes necessary for individual licensees. The staff recommends that these relief requests not be included with the application; they should be submitted only in cases when the staff concludes that it will not be able to meet the licensee's schedule requirements. Regarding our comments on the template for the language in such relief requests as suggested in Enclosure 3 of your letter, we suggest a meeting with our staff to discuss the items that need to be included.

The staff has been meeting with the industry (WOG and EPRI) regarding additional generic developments, such as application of RI-ISI to high energy line break (HELB) piping. The staff intends to further discuss its plan with WOG and EPRI to develop and implement such applications. As indicated in your Enclosure 1, the industry has an aggressive schedule for submittal of RI-ISI programs during the remainder of this year and the first half of next year. The staff believes that the reviews of these submittals should have a higher priority and hence limited staff resources might impact the review of extending the generic application of the risk-informed methodology to new applications.

In summary, the staff has been meeting the licensees' requested schedules for the reviews of the RI-ISI submittals that have been completed. We also expect to meet the schedules for the submittals currently under review and the requested schedules for future submittals. This, of course, is contingent upon the licensees taking no exceptions to the approved methodologies and responding in a timely and satisfactory manner to outstanding staff issues regarding the implementation of the RI-ISI methodologies.

We look forward to continuing to work with the industry as we progress through the implementation of RI-ISI programs at various plants. If you need further information, please contact Syed Ali (301-415-2776) of my staff.

Sincerely,

Brian W. Sheron, Associate Director
for Project Licensing and Technical Analysis
Office of Nuclear Reactor Regulation

Distribution: EMCB RF SJCollins RZimmerman JJohnson TJCarter (YT 020000271)
DOCUMENT NAME: G:\EMCB\ALI\NEI Letter Oct 2000 Response.wpd

OFFICE	EMCB:DE	EMCB:DE	EMCB:DE	DE:NRR
NAME	SAlI:saa	EJSullivan:ejs	WHBateman:whb	RHWessman:rhw
DATE	11/ 28 /00	11/22 /00	11 /22 /00	11/ 29 /00

OFFICE	DE:NRR	SPSB/DSSA	ADPT:NRR	
NAME	JRStrosnider:jrs	RBarrett:rb	BWSheron:bws	
DATE	11/ 29 /00	11/ 28 /00	12 / 04 /00	/ /00