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To: internet:DJW@NEI.ORG
Date: Thu, Jan 18, 2001 3:37 PM
Subject: LR Issues to Dicuss with NEI

Doug,

Here is the agenda for our meeting on ? for issues 50-60 and 63.

I have been asked to nail a date for the meeting as soon as possible.

I'll be calling soon.

Dave

**NEI Issues on Improved License Renewal Guidance Documents
for Management Attention (Based on 12/21/00 Public Meeting)**

Issue #	Issue	NEI Comment Number	Staff Preliminary Resolution
50	Application of GALL	---	<p>NEI commented that an applicant should be able to say that they have a program evaluated by GALL without having to do a line-by-line review of its program against to GALL program to determine that its program is bounded by GALL. For example, if an applicant has an ISI program that meets Section XI of the ASME Code and GALL calls out an ISI Section XI program is required for adequate aging management, then an applicant should just have to say in their application that they have a ISI Section XI program and not have to do a comparison of program against the program described in GALL. In 11/9/00 meeting with NRC staff (meeting summary dated 1/8/01), NEI was told by staff that GALL should be used in the same manner a topical report is used -- as a reference for accepted aging management programs. In conversation following 11/9/00 meeting with NEI, NEI commented that as long as the staff would provide with GALL the equivalent of application action items, which are provided in staff SERs on topical reports, then an applicant would clearly understand what additional actions are needed to be able to certify/credit that its site specific program met the GALL program (as is done with topical report SERs). In statements made in 12/4/00 Commission meeting on license renewal guidance documents NEI suggested the industry's desire to equate GALL to what was done in the environmental area with Category 1 and Category 2 issues described in the Generic Environmental Impact Statement (GEIS) for license renewal .</p> <p>The NRC staff believes that in order to treat aging management programs in GALL in a similar manner as Category 1 issues were treated in the GEIS would require rulemaking to 10 CFR Part 54 to codify GALL. The staff requests that NEI provide a proposed approach for how an applicant can most effectively use GALL, which might include using something similar to applicant actions items, to verify that the conclusions for the programs described in GALL require no further staff review.</p>

NEI Issues on Improved License Renewal Guidance Documents for Management Attention (Based on 12/21/00 Public Meeting)			
Issue #	Issue	NEI Comment Number	Staff Preliminary Resolution
51	Requirements above regulations	---	<p>NEI commented that when GALL aging management programs reference documents like NRC Generic Letters as providing some aspect of an aging management, GALL is going beyond regulatory requirements. An example would be the Boric Acid Corrosion AMP described in GALL Chapter XI section XI.M10. The GALL description of the boric acid program stipulates that NRC Generic Letter 88-05 provides guidelines for scope of program, detection of aging effects, monitoring and trending, corrective actions, and operating experience. Therefore, by using the GL 88-05 as an aging management for boric acid corrosion GALL is establishing new regulatory requirements.</p> <p>The staff believes the purpose of GALL is to provide one acceptable program for managing aging. In that regard, the staff has provided one acceptable program for managing the aging effects caused by boric acid corrosion. In implementing Part 54, the review of existing programs sets up a situation where actions needed to manage aging effects and maintain the current licensing basis for the period of extended operation might be increased beyond those considered necessary for the current term. The staff needs to better understand the nature of NEI's concern; therefore, the staff requests NEI provide additional clarification regarding this concern and potential remedies.</p>

**NEI Issues on Improved License Renewal Guidance Documents
for Management Attention (Based on 12/21/00 Public Meeting)**

Issue #	Issue	NEI Comment Number	Staff Preliminary Resolution
52	SRP Section A.1.2.1 – applicable aging effects threshold	SA.1-2	<p>The first sentence in Section A.1.2.1, paragraph 1 which describes applicable aging effects reads: “1. The determination of applicable aging effects is based on degradations that have actually occurred and those that potentially could cause structure and component degradation.”</p> <p>NEI commented that aging effects should be real and be caused by degradations that have actually occurred or that will occur. The term “potentially could” is too vague and subject to too much judgment.</p> <p>Staff considers that applicable aging effects need to include aging effects that have occurred and also those that potentially could occur. “Potentially could” does not mean that all aging effects that “potentially could” occur need to be managed. This statement needs to be further clarified to explain that when a potential aging effect not seen rises to a level of likelihood of occurrence, only then would it require aging management. Since there is no certainty when a “potential aging effect” rises to a level of likelihood of occurrence, this determination will have to involve engineering judgment from both the staff and the applicant.</p>
53	Applicable aging effects and aging effects requiring management	SA.1-8	<p>NEI comment is that in section A.1.2.1 of the SRP, applicable and potential aging effects need to be defined if it is determined that these are the correct terms to use.</p> <p>NEI commented that the use of consistent terminology between SRP and NEI 95-10. NEI 95-10 rev.2 eliminated the terms applicable/potential aging effect and uses the term “aging effect requiring management.” The term “potential” is too vague and subject to too much judgment. This issue is very closely related to issue #52.</p> <p>NRC staff considers that this issue is directly related to issue #52 and staff would like to discuss these issues with NEI in further detail. The definitions or terms that are used in the SRP should be used in NEI 95-10.</p>

NEI Issues on Improved License Renewal Guidance Documents for Management Attention (Based on 12/21/00 Public Meeting)			
Issue #	Issue	NEI Comment Number	Staff Preliminary Resolution
54	Aging effects in GALL that an applicant determines are not applicable	---	<p>In conversations with NEI following 11/9/00 meeting (described in line item No. 50) NEI clarified that basis for this comment is that not enough credit is being given to the NRC's review and approval of the applicant's scoping methodology. Specifically, the guidance in the SRP (Section A.1.2.1 No. 3, page A.1-2) telling the staff that there is an expectation that an applicant has to provide a basis as to why all aging effects listed in relevant aging information (such as GALL) ARE or ARE NOT managed. SRP Section A.1.2.1 No. 3 states, "If operating experience or other information indicates that a certain aging effect may be potentially applicable and an applicant determines that it is not applicable to its plant, the basis for this determination should be provided." NEI commented that references supporting the aging effects listed in GALL aren't always provided in GALL so that industry can challenge their applicability. In summary, NEI believes that NRC should not use GALL as the basis to tell applicants "tell me why every aging effect listed in GALL is not being managed."</p> <p>The staff believes that SRP Section A.1.2.1 No.1, page A.1-2, provides further clarification that the staff is only interested in applicable aging effects based on experience to date. To provide further clarification the NRC staff is considering to modify No. 3 as follows: "If operating experience or other information indicates that certain aging effects may be applicable and an applicant does not justify the absence of the aging effect in its application, it may be appropriate to question its absence. However, in questioning the absence of the aging effect, a reference and/or basis which provides relevance to aid the applicant in addressing the question shall be provided. For example, the question could cite a previous application review, NRC generic communications, engineering judgment, relevant research information, or other industry experience as the basis for the question. Simply citing that the aging effect is listed in GALL is not a sufficient basis. For example, the aging effect is applicable to a PWR component, but the applicant's plant is a BWR and does not have such a component. In this example, using the GALL report merely as a check list is not relevant."</p>

NEI Issues on Improved License Renewal Guidance Documents for Management Attention (Based on 12/21/00 Public Meeting)			
Issue #	Issue	NEI Comment Number	Staff Preliminary Resolution
55	SRP Section A.1.2.1 – aging effects not need to be managed	SA.1-9	<p>NEI commented to delete SRP A.1.2.1, paragraph 3 that states “3. If operating experience or other information indicate that a certain aging effect may be potentially applicable and an applicant determines that it is not applicable to its plant, the basis for this determination should be provided.”</p> <p>NEI commented that the Rule does not require an application to state why an aging effect is not applicable to its plant.</p> <p>NRC staff considers this issue is similar to issue #54. The staff preliminary resolution of issue #54 also applies to this issue.</p>
56	SRP Section A.3.2.1 – NUREG-0933	SA.3-1	<p>SRP Appendix A.3, Section A.3.2.1, Item 2, states that “the version of NUREG-0933 that is current on the date 6 months before the date of the license renewal application should be used to identify such issues.”</p> <p>NEI commented that if an applicant follows the SRP which states that a 6 month old version of NUREG-0933 may be used but there are new items in a later version, it will be required to address items in the latest version. Therefore, the statement in the SRP is misleading.</p> <p>NRC staff is considering to revise A.3.2.1, item 2, second sentence to read “The current version of NUREG 0933 should be used to identify such issues.” Also, the staff is considering to revise the SRP to explain the process for handling new items that are added to NUREG-0933 after the application is issued. The outline for this process would be: (1) The application should address issues in the latest version of NUGREG-0933 available at the time the application is submitted, and (2) prior to SER completion, any new issues that arise must be reviewed and resolved if determined to be applicable to the applicants plant.</p>

NEI Issues on Improved License Renewal Guidance Documents for Management Attention (Based on 12/21/00 Public Meeting)			
Issue #	Issue	NEI Comment Number	Staff Preliminary Resolution
57	DBEs on scoping	S2-2	<p>NEI commented: In the second sentence replace “accident” with “events.” Remove the sentence beginning with “however, events such as fire,” and the next sentence and replace with “Design basis events are defined as conditions of normal operations, including anticipated operational occurrences, design basis accidents, external events, and natural phenomena for which the plant must be designed to ensure the functions in 54.4(a)(1). See the Branch Technical position beginning on page A.1-1 of the SRP, specifically the design basis event discussion on page A.1-2 in the second paragraph of item 6.</p> <p>NRC staff is considering revising the SRP as follows: “Accident” will be replaced by “event.” Fire, floods, storms, earthquakes, tornadoes, and hurricanes are <u>examples</u> of design basis events and/or anticipated operational occurrences currently used in NUREG-0800 but not addressed in Chapter 15 (Accident Analysis). As such, they are consistent with the definition in §50.49(b)(1)(ii).</p>

NEI Issues on Improved License Renewal Guidance Documents for Management Attention (Based on 12/21/00 Public Meeting)			
Issue #	Issue	NEI Comment Number	Staff Preliminary Resolution
58	IPE/IPEEE on scoping	S2-3	<p>NEI commented to Delete item 4. The LR Rule is deterministic not probabilistic. In 60FR22468: "... [The Commission concludes that it is inappropriate to establish a licensee renewal scoping criterion... that relies on plant-specific probabilistic analyses. Therefore, within the construct of the final rule, PRA techniques are of very limited use for license renewal scoping." Further, the guidance in item 4 focuses on drawing "attention to specific vulnerabilities (e.g. results of an IPE or IPEEE)." These evaluations are not parts of the CLB. . Staff review of these documents may not provide the information it is seeking. The IPE and IPEEE reports reflect the estimated core damage frequency for the plant configuration at the time the evaluation is performed. These reports also may contain recommendations to modify the plant, revise procedures, or develop training to further reduce the estimated core damage</p> <p>The NRC staff considers that while the LR Rule is "deterministic," the Commission in the SOC of the Rule also states: "In license renewal, probabilistic methods may be most useful, on a plant-specific basis, in helping to assess the relative importance of structures and components that are subject to an aging management review by helping to draw attention to specific vulnerabilities (e.g. results of an IPE or IPEEE)." NEI's comments are addressed at a section of the SRP which provides <u>guidance</u> to the reviewer as to what sources of information are useful for assessing the applicant's CLB.</p>

NEI Issues on Improved License Renewal Guidance Documents for Management Attention (Based on 12/21/00 Public Meeting)			
Issue #	Issue	NEI Comment Number	Staff Preliminary Resolution
		S2-4	<p>NEI commented to delete item 5. The LR Rule is deterministic not probabilistic. In 60FR22468: "... [The Commission concludes that it is inappropriate to establish a licensee renewal scoping criterion... that relies on plant-specific probabilistic analyses. Therefore, within the construct of the final rule, PRA techniques are of very limited use for license renewal scoping." Staff review of the probabilistic documents may not provide the information it is seeking. The IPE and IPEEE reports reflect the estimated core damage frequency for the plant configuration at the time the evaluation is performed. These reports also may contain recommendations to modify the plant, revise procedures, or develop training to further reduce the estimated core damage frequency. Some plant modifications may reduce the frequency of initiating events and others may improve the reliability of credited mitigation systems. The IPE and IPEEE reports do not change the CLB by themselves. The plants must perform complete 50.59 reviews and may or may not implement the recommended modifications. Those modifications that are implemented will be reflected in plant drawings, FSAR changes, or technical specification changes, as appropriate. The staff is already reviewing these latter documents which provide more current information than that which may be contained in the IPE and IPEEE reports.</p> <p>The NRC staff considers that while the LR Rule is "deterministic," the Commission in the SOC of the Rule also states: "In license renewal, probabilistic methods may be most useful, on a plant-specific basis, in helping to assess the relative importance of structures and components that are subject to an aging management review by helping to draw attention to specific vulnerabilities (e.g. results of an IPE or IPEEE)." NEI's comments are addressed at a section of the SRP which provides <u>guidance</u> to the reviewer as to what sources of information are useful for assessing the applicant's CLB.</p>

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Issue #	Issue	NEI Comment Number	Staff Preliminary Resolution
		S2-11	<p>NEI commented to delete "Probabilistic Risk Assessment summary report."</p> <p>The NRC staff considers that while the LR Rule is "deterministic," the Commission in the SOC of the Rule also states: "In license renewal, probabilistic methods may be most useful, on a plant-specific basis, in helping to assess the relative importance of structures and components that are subject to an aging management review by helping to draw attention to specific vulnerabilities (e.g. results of an IPE or IPEEE)." NEI's comments are addressed at a section of the SRP which provides <u>guidance</u> to the reviewer as to what sources of information are useful for assessing the applicant's CLB.</p>
59	EOPs on scoping	S2-12	<p>NEI commented to delete "Emergency operating procedures."</p> <p>The NRC staff considers that EOPs were developed to cope with analyzed plant-specific <u>transients and accidents</u> in accordance with NUREG-0737, Item I.C.1 requirements. While EOPs deal with some transients and/or accidents not bound by plant-specific CLBs, EOPs nonetheless constitute a valuable source of information regarding both the facility's CLB and its design basis events.</p>

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Issue #	Issue	NEI Comment Number	Staff Preliminary Resolution
60	ACRS comments on EOPs/severe accident management on scoping	---	<p>NEI commented on the ACRS comments on EOPs/severe accident management on scoping.</p> <p>From Travers response to 11/15/00 ACRS Letter on License Renewal Guidance Documents (Adams Accession ML003776927): ACRS Comment: "The staff and the industry should provide consistent guidance of the use of emergency operating procedures (EOPs) and severe accident management guidelines (SAMGs) as possible information sources to verify that equipment important to safety has not been inadvertently left out by the license renewal rule scoping process." NRC Response: "The staff agrees that these documents are potential information sources for identifying the structures, systems, and components within the scope of the license renewal rule. SRP-LR Table 2.1-1, "Sample Listing of Potential Information Sources," lists EOPs as possible information sources and the staff will add the SAMGs to the table. The staff will also ask NEI to add these documents to NEI 95-10 Table 3.1-1, Sample Listing of Potential Information Sources, as potential information sources."</p>
61	SECY 96-146 on fire barrier	G-VII-G-4	To be provided with input from Peter Kang's file with issues 35 to 48
62	NFPA commitments	G-XI-M10-2	To be provided with input from Peter Kang's file with issues 35 to 48
63	Nominal plant environment terminology for electrical	G-XI-E-1	<p>In GALL paragraph 1 of XI.E1 and XI.E2, NEI commented that "nominal plant" should be replaced with "plant design".</p> <p>The NRC staff considers that "plant design environment" is based on the maximum temperature expected so there is no need introduce the term "maximum" since it is inherently understood when the plant design environment is specified.</p>