



NUCLEAR ENERGY INSTITUTE

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NUCLEAR GENERATION

April 16, 2001

Mr. Christopher I. Grimes  
Chief, License Renewal and Standardization Branch  
Division of Regulatory Improvement Programs  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**SUBJECT:** NEI 95-10, *Industry Guideline for Implementing the Requirements of 10 CFR Part 54 – The License Renewal Rule*

**PROJECT NUMBER:** 690

Dear Mr. Grimes:

Enclosed for NRC staff endorsement is Revision 3 to NEI 95-10, "Industry Guideline for Implementing the Requirements of 10 CFR Part 54 – The License Renewal Rule." It is our understanding the NRC staff will endorse NEI 95-10, Revision 3 without exception in Regulatory Guide 1.188, "Standard Format and Content for Applications to Renew Nuclear Power Plant Operating Licenses."

We previously provided Revision 3 in our letter dated March 1, 2001. In that letter we noted our intention to conduct an industry review of the document and that additional changes may result. The industry review is complete and there are a few changes which are discussed in Enclosure 1. Also, we are providing a mark-up of the March 1 version as well as a clean copy.

We understand the NRC staff is preparing a paper in response to the Commission's Staff Requirements Memorandum on the subject of credit for existing programs for license renewal. It is our understanding that the staff's paper will transmit the Generic Aging Lessons Learned (GALL) Report, the Standard Review Plan for the Review of License Renewal Applications for Nuclear Power Plants (SRP), Regulatory Guide 1.188 "Standard Format and Content for Applications to Renew Nuclear Power Plant Operating Licenses," and NEI 95-10 to the Commission and recommend they approve the SRP and Regulatory Guide for publication. Although we have not had the opportunity to review these final regulatory documents, we have been afforded the opportunity to make significant comments on the draft versions. The staff has been open to and responsive to these comments. We support the staffs' recommendation that these documents be approved by Commission.

Mr.Christopher I. Grimes

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With the submittal of NEI 95-10, Revision 3 and the finalization of the GALL and the SRP, we now have a set of guidance documents that should result in a stable, predictable and efficient license renewal process. Both the NRC staff and the industry have expended significant resources get to this point and we appreciate the NRC staff's dedication, hard work and willingness to work through some very difficult issues.

We look forward to continuing our dialogue with the NRC staff on issues that we believe will further enhance the guidance documents and the license renewal process. One such issue is how GALL and the SRP are used by licensees in the preparation of a license renewal application. We are pleased that the NRC staff has agreed to participate in an industry demonstration project that will provide examples of how we intend to use the documents. Although the program is not scheduled for completion until later this year, we do not believe issuance of the guidance documents should be delayed.

Please call if you have any questions or desire to discuss Revision 3 in more detail.

Sincerely,

A handwritten signature in black ink that reads "Douglas J. Walters". The signature is written in a cursive, slightly slanted style.

Douglas J. Walters

Enclosure

c: Mr. P.T. Kuo, NRC  
Mr. David Solorio, NRC

### Changes to March 1, 2001 Version of NEI 95-10, Revision 3

In addition to a few editorial changes the following are the changes in this version of NEI 95-10, Revision 3:

- Added Sever Accident Management Guidelines and Individual Plant Examination of External Events to Table 3.1-1 “SAMPLE LISTING OF POTENTIAL INFORMATION SOURCES” and the corresponding text in Section 3.0 that discusses hoe to use those documents in the license renewal scoping process.
- Incorporated guidance in Section 4.1.1 to clarify that color schemes on marked-up drawings should be such that when the drawing is printed in black and white there is no loss of meaning.
- Included the current version of 10CFR Part 54 into Appendix A.
- Added a note in the Appendix B table that references the NRC letter to NEI on the use of FERC required inspection and maintenance programs for dam aging management.