

May 17, 2001

Dr. George E. Apostolakis, Chairman  
Advisory Committee on Reactor Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

SUBJECT: RESPONSE TO APRIL 13, 2001, ACRS LETTER TO CHAIRMAN MESERVE,  
"PROPOSED FINAL LICENSE RENEWAL GUIDANCE DOCUMENTS"

Dear Dr. Apostolakis:

Thank you for your letter to Chairman Meserve dated April 13, 2001, outlining the Advisory Committee on Reactor Safeguards (ACRS) conclusions and recommendations regarding the improved license renewal guidance documents. The staff appreciates that the ACRS devoted significant effort to reviewing the details of these documents.

In addition to recommending that the improved renewal guidance documents be approved, the ACRS made two other recommendations related to future improvements to the license renewal process. The staff's response to these recommendations is as follows:

1. The staff should encourage applicants to include the results of the scoping process in their applications. The availability of these results will facilitate the review process significantly and make license renewal applications more understandable.

Response: As indicated in the ACRS letter, the License Renewal Rule (10 CFR 54.21) requires that an applicant describe and justify a method for license renewal scoping and provide the resulting list of structures and components subject to an aging management review in a license renewal application. The previous license renewal rule (issued in 1991) required an applicant to provide a list of systems, structures, and components (SSCs) within the scope of license renewal (the 1991 rule used the phrase "important to license renewal"). In 1995, during rulemaking efforts to amend the license renewal rule to provide a more stable and predictable regulatory process, the staff removed this requirement to allow flexibility to an applicant when performing plant-specific scoping (60 FR 22478). However, though the list of SSCs within the scope of license renewal is no longer required by the current rule, the initial license renewal applicants voluntarily provided that information to facilitate the staff's review. The applications submitted thus far have provided marked-up piping and instrument diagrams (P&IDs) showing mechanical components that are within the scope of license renewal for their plants. In some cases, the P&IDs were not explicitly referenced in the application. In your interim letter related to the license renewal of Plant Hatch, dated April 16, 2001, the ACRS noted that the applicant for Plant Hatch presented scoping results categorized by the function of the component rather than by the system, which created what the ACRS termed "navigational challenges" in ascertaining which systems, structures, and components are within the scope of license renewal.

The staff agrees that the availability of the scoping results will facilitate the review process. Both the Standard Review Plan for License Renewal and the Nuclear Energy Institute document (NEI 95-10, Rev. 3) which the staff proposes to endorse via Regulatory Guide 1.188, indicate that an applicant should provide a list of all the plant systems and structures identifying those that are within the scope of license renewal. These documents also state that an applicant may identify particular portions of the system in marked-up P&IDs or other media within the scope of license renewal. However, in responding to public comments on the Standard Review Plan for License Renewal, the staff also added guidance to indicate that a list of systems, structures, and components within the scope of license renewal is not required by the rule.

The staff believes that future applicants understand the importance of voluntarily providing scoping information to improve the public credibility and efficiency of the review process. Nevertheless, the staff will continue to work with the industry representatives to develop improvements to the guidance for renewal application content. In addition, the staff will note this recommendation in response to the Commission's request for the staff to evaluate the need for any renewal rule changes.

2. The staff has agreed to update the GALL report periodically. The staff should also update the Standard Review Plan (SRP) and Regulatory Guide 1.188 to make them consistent with the updated GALL report.

Response: The staff agrees that these documents should be updated periodically. As indicated in our December 22, 2000, response to the ACRS, the staff will periodically update these documents as lessons are learned from subsequent license renewal reviews. Similarly, NEI plans to update NEI 95-10 to reflect additional lessons learned. The frequency at which updates will be made is still being evaluated by the staff and NEI. In addition, NEI has proposed an industry demonstration project to develop additional guidance on the appropriate ways to use the Generic Aging Lessons Learned Report (NUREG-1801) in a license renewal application. This project consists of sample license renewal application sections prepared by future renewal applicants following the guidance in the improved license renewal guidance documents. The staff will participate in this demonstration project to develop implementation details. Lessons learned from this demonstration project will also be incorporated in future updates of these documents.

The staff intends to evaluate the appropriate timing and methods to consistently update all of the related guidance documents when the demonstration project is completed, and incorporate further improvements in accordance with the established process for such guidance.

Dr. G. E. Apostolakis

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The NRC staff appreciates the support and excellent working relationship the Committee has provided to the license renewal program, and we look forward to continuing that relationship as future improvements are developed for the renewal guidance and process. Please let me know if the Committee has any further questions or comments.

Sincerely,

*/RA/*

William D. Travers  
Executive Director  
for Operations

cc: Chairman Meserve  
Commissioner Diaz  
Commissioner Dicus  
Commissioner McGaffigan  
Commissioner Merrifield  
SECY

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