

June 25, 2001

MEMORANDUM TO: File

FROM: Sam Lee, Sr. Materials Engineer */RA/*
Technical Section
License Renewal and Standardization Branch
Office of Nuclear Reactor Regulation

SUBJECT: DRAFT DISCUSSION TOPICS FOR NUCLEAR ENERGY INSTITUTE
(NEI) LICENSE RENEWAL DEMONSTRATION PROJECT

On June 25, 2001, I provided the attached e-mail to Mr. Alan Nelson of NEI transmitting draft discussion topics for their License Renewal Demonstration Project. We held a conference call with NEI on June 20, 2001, to discuss draft Request for Additional Information (RAI) for the Demonstration Project. The attached discussion topics were process questions identified at that conference call. We are planning a public meeting with NEI on either July 24 or 25, 2001, to discuss the lessons learned from developing and responding to the RAI. We plan to use the list of discussion topics as the agenda for that meeting. This articulation of the process questions should facilitate the meeting.

Attachment: As stated

Project No. 690

cc: PUBLIC

From: Samson Lee
To: internet: apn@nei.org
Date: 6/25/01 1:37PM
Subject: Draft discussion topics for license renewal demo project

Alan:

Attached is my draft of process discussion topics based on our 6/20/01 conference call on the NEI License Renewal Demonstration Project regarding request for additional information. Please comment. The purpose of preparing this list is to identify the topics for discussion. This list should be the agenda for the July public meeting and should facilitate the meeting.

Thanks,
Sam

CC: Dls2; ptk

6/25/01

Draft Topics for Meeting Discussion
Nuclear Energy Institute (NEI) License Renewal Demonstration Project

1. The program evaluation in the Generic Aging Lesson Learned (GALL) report is specific to the aging effect and component. Thus, the GALL report conclusion applies to “program A that is evaluated to manage aging effect B for component C”. How to adopt the GALL program evaluation conclusion to other situations?

Example: Does the above statement apply to component D that is not addressed in the GALL report (that is, substituting D for C)? For example, Section 3.5 (Plant X) of the demonstration project indicates that loss of material and cracking of the fuel transfer tube are managed by the chemistry program and containment leak rate program. Section 3.5 indicates that the fuel transfer tube is not addressed in the GALL report. However, these programs are evaluated in the GALL report for these aging effects in similar materials and environment.

Example: Does the above statement apply to program E that is evaluated for other situations in the GALL report (that is, substituting E for A)? For example, Section 3.5 (Plant Y) of the demonstration project indicates that Plant Y is proposing to manage loss of material, cracking, and change in material properties for buried containment concrete using the structures monitoring program evaluated in the GALL report. However, the GALL report does not evaluate the structures monitoring program for this situation. The GALL report evaluates other programs for managing aging of the containment.

2. The GALL report, mostly in Chapters II and III, identifies specific conditions that should be met for the GALL report conclusion to apply. Should an applicant address these specific conditions in the application?

Example: Chapter II of the GALL report indicates that further evaluation is necessary if aggressive chemical attack is significant for inaccessible areas of containment. The GALL report defines conditions when aggressive chemical attack is not significant. Should the applicant indicate in the application how they meet these conditions in the GALL report? If so, how should the staff review this information?

3. The GALL report considers operating experience up to when the report is completed, that is, April 2001. How to address operating experience in an application after the issuance of the GALL report?

Example: On June 12, 2001, the staff issued Information Notice 2001-09 on the flow-accelerated corrosion program. Should an applicant discuss this in the application to conclude that the GALL conclusion remains valid for its plant? If so, should there be a cut-off date (such as 6 months prior to

submitting the application) for addressing recent operating experience? The staff may send a request for additional information (RAI) for operating experience that occurs after that cut-off date, but before the completion of the staff review.

Example: Alternatively, should the applicant discuss its process for addressing operating experience in the application, but not include discussion of any specific recent operating experience in the application? The staff may send RAIs on specific recent operating experience, such as Information Notice 2001-09.

4. What is the appropriate wording to indicate that an applicant meets the evaluation as described in the GALL report?

Example: The demonstration project uses different words (underlined below):
“The information in the GALL report bounds Plant X.”
“... programs ... agree with the GALL report ...”
“... are consistent with the GALL report ...”

5. The Standard Review Plan for License Renewal (SRP-LR) summarizes the program evaluation in the GALL report. If an applicant elects not to rely on a particular program listed in the SRP-LR, should the applicant identify that in the application?

Example: Section 3.5 of the SRP-LR for structures lists the protective coating program for managing loss of material for steel structural elements. Section 3.5 (Plant X) of the demonstration project is not relying on this program. Should the applicant identify in the application that the protective coating program is not relied on for Plant X?

6. How to handle potential clarification issues for the improved guidance documents?

Example: During the demonstration project, NEI identifies that the GALL program determination for structures and containment may need to be clarified. If an applicant identifies such clarification issues, they should submit them to NEI for formal transmission to the staff for consideration for future document updates. However, before the documents are updated, the applicant should use judgement to determine if the issue belongs in one of these two categories: (1) If the applicant can determine the technical meaning, the applicant should treat this as an editorial comment and document on site. (2) If the applicant can not determine the technical meaning, the applicant should treat its program as different from the GALL report and submit its plant-specific program in the application.