

AGENDA FOR NUCLEAR ENERGY INSTITUTE (NEI)
LICENSE RENEWAL DEMONSTRATION PROJECT PUBLIC MEETING

July 25, 2001

Objectives:

- Discuss license renewal application format using the Generic Aging Lessons Learned (GALL) report
- Discuss process issues identified during the request for additional information (RAI) process in the NEI demo project

Success:

- Agreement on format that best utilizes industry and staff resources
- Resolve process issues; otherwise, develop a clear understanding of the issues for further evaluation

Agenda:

	Introduction	9:00-9:05AM
1.	License renewal application format ("SRP" vs. "6-column")	9:05-10:05AM
	Break	10:05-10:20AM
2.	Adopting GALL program conclusion to other situations	10:20-11:00AM
3.	Addressing specific GALL conditions in an application	11:00-11:30AM
	Lunch and caucus	11:30-1:00PM
	Caucus report: License renewal application format	1:00-1:20PM
4.	Operating experience after the issuance of the GALL report	1:20-1:40PM
5.	Wording for meeting the GALL evaluation	1:40-2:00PM
	Break	2:00-2:15PM
6.	Identification of not-relied-on programs in the application	2:15-2:30PM
7.	Potential clarification issues in guidance documents	2:30-3:00PM
8.	Program names in application (plant specific vs. GALL)	3:00-3:15PM
	Summary and Concluding Remarks	3:15-3:30PM

ML011910032

Topics for Meeting Discussion
Nuclear Energy Institute (NEI) License Renewal Demonstration Project
(July 25, 2001, Public Meeting)

1. The demo project consists of 2 formats: "SRP" format that is a rolled up of aging management results consistent with the revised Standard Review Plan for License Renewal; and "6-column" format that is consistent with previous submitted applications. Which format would best utilize industry and staff resources?
2. 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.

3. 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?

4. 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.

5. 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 ...”

6. 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?

7. 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.

8. How should the differences in program names be handled in a license renewal application? Should the application use the actual site-specific names of the site programs or should the application use the GALL name of the program when taking credit for an aging management program that is part of the current licensing basis?

Example: One site's "Preventative Maintenance" program is credited for implementing GALL's "Aboveground Carbon Steel Tanks" program.