



NUCLEAR ENERGY INSTITUTE

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March 13, 2002

Mr. Christopher I. Grimes  
Program Director  
License Renewal and Environmental Impacts  
Division of Regulatory Improvement Programs  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**SUBJECT:** Staff Guidance for Updating the Improved License Renewal Guidance Documents

**PROJECT NUMBER:** 690

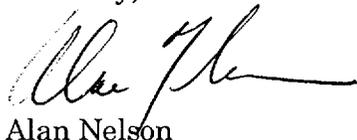
Dear Mr. Grimes:

On December 21, 2001 NEI received "Staff Guidance for Updating the Improved License Renewal Guidance Documents," for review and comment. On January 25, 2002 a meeting was held with NRC staff and industry representatives to review the guidance and discuss clarifications. Based on these discussions Enclosure 1 provides recommended clarifications to the proposed interim staff guidance.

Based on the recent Ft. Calhoun submittal demonstrating the SRP format and the October 3, 2002 Demonstration Project Lessons Learned correspondence we recognize that there will be additional License Renewal Guidance Document enhancements and we will be providing them at a later date.

If you have any questions, please call me at (202) 739-8110 or e-mail (apn@nei.org).

Sincerely,



Alan Nelson

Enclosure

c: P.T. Kuo

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**NEI Comments**  
**Staff Guidance for Updating the Improved License Renewal**  
**Guidance Documents dated December 21, 2001**

**Section 4.2.3.2 – Description**

Add the following sentence:

The ISG will be identified as generically applicable or applicable to a specific scope (e.g. BWRs only).

**Section 4.2.3.2 – References**

Revise the second sentence to read:

These could include the ASME and ANSI Codes, NUREGs, other ISGs, Part 54 subsections, and Regulatory Guides

**Appendix B flow chart – applicants portion and**

**Section 4.2.4 – Implementation of the ISG**

Revise the second paragraph to read:

.....At this point, the ISG will have a number designation representing the year and issue number (i.e. 01-01) and an implementation date. The ISG can then be referenced in an applicant's LRA or as a part of the LRA regulatory review process. Implementation of the ISG by the applicant may vary due to the complexity of the ISG and timing of the applicant's LRA submittal.

**Section 4.2.4 – Implementation of the ISG (withdraw)**

Revise the last paragraph to include the following:

The NRC may decide, after receiving stakeholder comments, to withdraw the ISG. In this case the process is... (NRC should describe their process.).

**Section 4.2.4 – Implementation of the ISG**

Include the following paragraph to be consistent with the Appendix B flowchart:

ISGs will remain effective until incorporated in Improved License Renewal Guidance Documents. Implementation of a new revision of the guidance documents by the applicant may vary due to the complexity of the changes and timing of the applicant's LRA submittal. Therefore an applicant may continue to reference an ISG after guidance document revisions are issued.