October 30, 2002

ORGANIZATION: NUCLEAR ENERGY INSTITUTE

SUBJECT: SUMMARY OF THE OCTOBER 9, 2002, MEETING WITH THE NUCLEAR ENERGY INSTITUTE (NEI) RE: STANDARD FORMAT FOR LICENSE RENEWAL APPLICATIONS

On October 9, 2002, the staff held a public meeting with the Nuclear Energy Institute's (NEI's) License Renewal Task Force to follow up on the formatting issues for license renewal applications (LRAs) that were agreed to in principle, in a September 24, 2002, meeting. After reviewing four LRAs submitted using the guidance provided in NUREG-1801, "Generic Aging Lessons Learned (GALL) Report," the industry and the staff recognized the need to standardize the format for the LRAs. Mr. Alan Nelson, Senior Project Manager at NEI, stated that while the four applications offered the information NRC requires to evaluate an application, there was little consistency on the presentation of the material. Dr. Pao-Tsin Kuo, Program Director, License Renewal and Environmental Impacts Program agreed. Dr. Kuo stressed that with the reduction in review times, a standard format for LRAs will play a key part in helping the agency achieve its review schedule. Enclosed are the agenda (Enclosure 1), the list of meeting attendees (Enclosure 2), and meeting handouts (Enclosure 3).

The goal of the meeting was to establish an improved format for the LRA. The staff and NEI discussed a sample of Sections 2 and 3 of an LRA that was developed, following the guidance provided in the September 24, 2002, meeting. The format for Section 2 did not change substantially. The staff made the following recommendations regarding Section 2:

1) The system description should specify the intended function that required the system to be brought into scope.

2) The system description section of the LRA should contain sufficient detail for the staff to use it in the section of the safety evaluation report (SER) that discusses the technical information in the application.

3) If the reason for the system boundary identified on the LRA print is not readily apparent, then the LRA should describe the reason for the system boundary.

4) If systems boundaries are realigned, then the reason for the realignment and how it was accomplished needs to be communicated to the staff.

The main format changes occurred in the Section 3 tables. The new format will have two tables. Table 1 is, essentially, the NUREG-1801, Volume 1, "Generic Aging Lessons Learned (GALL) Report" table with the addition of a discussion column and an item number column (tracking number for easy cross-referencing). In order to maintain the number sequence for the items in the table consistent with the Standard Review Plan for License Renewal

(SRP-LR), all entries will be included. If the entry applies to a boiling water reactor (BWR) only and the plant under review is a pressurized water reactor (PWR), the line entry will state BWR only, and will be included.

Table 2 in Section 3 has more extensive modifications. Columns have been added to reference the GALL item and the SRP-LR item that address the component type being evaluated. A note column has also been added. The purpose of the note is to provide additional explanation about the component. The notes are of two types; standard notes and plant-specific notes. The wording of the standard notes will be agreed upon by the staff and industry. The staff and NEI discussed defining the term "consistent with GALL." "Consistent with GALL" does not mean "identical to GALL" in every detail. However, it was agreed that the definition of "consistent with GALL" would be addressed in the example to be worked out at the next meeting. In the text section of Section 3, the example would be revised to include a discussion of how the tables work. This discussion should be written so that a knowledgeable member of the public can understand how the tables work. The example described four subsections; scope, results, conclusions, and references. The staff recommended that "scope" should not be used for the title of a subsection in Section 3 since the word "scope" has a specific meaning in license renewal.

Mr. Nelson stated that, for the new format to be successfully implemented, all parties need to understand the changes to the format. The staff agreed and will encourage the reviewers that have not been involved in developing the new format to attend the October 22-23, 2002, license renewal public workshop, so that they can be made aware of the changes to the format. In order to achieve consistent LRAs for the class of 2003, neither the applicant nor the staff should deviate from the standardized format. Mr. Nelson said NEI planned to submit the industry's finalized format by the end of December 2002, and requested the staff review and approve the format by January 15, 2003. The staff said it could not commit to that schedule and that it would be better to finalize the schedule after the November 6, 2002, meeting.
Mr. Nelson requested that the new format apply to the applications submitted after June 2003. The staff stated that they would not require an applicant to follow the new format; however, if applicants do not follow the new format, they obviously would not receive the benefits of the new format.

At the close of the meeting, the staff and NEI captured the action items needed to finish developing the LRA format and the steps to take to make sure the implementation of the new format is successful. NEI agreed to revise the example based on the comments received during the meeting and to send a draft copy to the staff prior to the workshop (action item 1). The staff will be prepared to discuss the draft at the workshop. The staff will, at the workshop, discuss the same lessons learned that were discussed at this meeting (action item 2). The staff will schedule a November 6, 2002, meeting to finalize the format (action item 3). The staff has developed an SER template for a GALL application based on the Fort Calhoun Station application. The staff will make the minor changes to template needed to address the new format (action item 4).

Action Items:
1) The NEI will send in the revised examples based on today's meeting before the workshop including:

- Addition of a short sentence (and hyperlink if possible) to Section 2 to indicate that the aging management review (AMR) results are shown in the corresponding Section 3 table (linking intended functions to AMR results).

- Addition of a table/section to Section 3 that describes the component intended functions (and identifies their abbreviations, where applicable).

- In the "Discussion" column of Table 1, addition of a reference to where the "Further Evaluation Required, Yes" information can be found in Section 3 (and a hyperlink to the information, if possible).

2) The NRC will include the lessons learned discussed at this meeting in the October 22-23, 2002, workshop.

3) The NRC will schedule a meeting on November 6, 2002, to further discuss the formatting issues.

4) The NRC will make changes need to the SER template after the LRA format is finalized.

A draft of this meeting summary was provided to NEI to allow them the opportunity to comment prior to the summary being issued.

/RA/

Jack S. Cushing, Project Manager
License Renewal and Environmental Impacts Program
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Project No. 690

Enclosures: As stated

cc w/encls: See next page

Action Items:

1) The NEI will send in the revised examples based on today's meeting before the workshop including:

- Addition of a short sentence (and hyperlink if possible) to Section 2 to indicate that the aging management review (AMR) results are shown in the corresponding Section 3 table (linking intended functions to AMR results).

- Addition of a table/section to Section 3 that describes the component intended functions (and identifies their abbreviations, where applicable).

- In the "Discussion" column of Table 1, addition of a reference to where the "Further Evaluation Required, Yes" information can be found in Section 3 (and a hyperlink to the information, if possible).

2) The NRC will include the lessons learned discussed at this meeting in the October 22-23, 2002, workshop.

3) The NRC will schedule a meeting on November 6, 2002, to further discuss the formatting issues

.4) The NRC will make changes need to the SER template after the LRA format is finalized.

A draft of this meeting summary was provided to NEI to allow them the opportunity to comment prior to the summary being issued.

/RA/

Jack S. Cushing, Project Manager
License Renewal and Environmental Impacts Program
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Project No. 690

Enclosures: As stated

cc w/encls: See next page

DISTRIBUTION:
See next page

DOCUMENT NAME: C:\ORPCheckout\FileNET\ML023040084.wpd

OFFICE	LA:RLEP	PM:RLEP	SC:RLEP
NAME	HBerilla	JCushing	SLee
DATE	10/29/02	10/30/02	10/30/02

OFFICIAL RECORD COPY

DISTRIBUTION: Summary of Meeting w/NEI Re: LRA Standard Format, Dated: October 30, 2002, Package: ML0230303410

HARD COPY

RLEP RF
J. Cushing

E-MAIL:

PUBLIC
J. Johnson
W. Borchardt
D. Matthews
F. Gillespie
RidsNrrDe
R. Barrett
E. Imbro
G. Bagchi
K. Manoly
W. Bateman
J. Calvo
C. Holden
P. Shemanski
H. Nieh
G. Holahan
H. Walker
S. Black
B. Boger
D. Thatcher
G. Galletti
C. Li
J. Moore
R. Weisman
M. Mayfield
A. Murphy
W. McDowell
S. Smith (srs3)
T. Kobetz
C. Munson
RLEP Staff

A. Thadani
C. Julian
R. Gardner
M. Farber
M. Modes
J. Vora

NUCLEAR ENERGY INSTITUTE

Project No. 690

cc:

Mr. Joe Bartell
U.S. Department of Energy
NE-42
Washington, DC 20585

Ms. Christine S. Salembier
Commissioner
State Liaison Officer
Department of Public Service
112 State St., Drawer 20
Montipelier, VT 05620-2601

Mr. Alan P. Nelson
Nuclear Energy Institute
1776 I St., N.W., Suite 400
Washington, DC 20006-3708
APN@NEI.ORG

Mr. Stephen T. Hale
Florida Power & Light Company
9760 S.W. 344 St.
Florida City, FL 33035

Mr. William Corbin
Virginia Electric & Power Company
Innsbrook Technical Center
5000 Dominion Blvd.
Glen Allen, VA 23060

Mr. Frederick W. Polaski
Manager License Renewal
Exelon Corporation
200 Exelon Way
Kennett Square, PA 19348

George Wrobel
Manager, License Renewal
R.E. Ginna Nuclear Power Plant
1503 Lake Rd.
Ontario, NY 14519

Mr. David Lochbaum
Union of Concerned Scientists
1707 H St., NW, Suite 600
Washington, DC 20006-3919

Ronald B. Clary
Manager, Plant Life Extension
V.C. Summer Nuclear Station
Bradham Blvd.
P.O. Box 88
Jenkinsville, SC 29065

Mr. Robert Gill
Duke Energy Corporation
Mail Stop EC-12R
P.O. Box 1006
Charlotte, NC 28201-1006

Mr. John B. Herman
Manager - Nuclear Licensing
Omaha Public Power District
Fort Calhoun Station FC-2-4 Adm.
Post Office Box 550
Fort Calhoun, NE 68023-0550

Mr. Paul Gunter
Director of the Reactor Watchdog Project
Nuclear Information & Resource Service
1424 16th St., NW, Suite 404
Washington, DC 20036

Mr. Hugh Jackson
Public Citizen's Critical Mass Energy &
Environment Program
215 Pennsylvania Ave., SE
Washington, DC 20003

Mary Olson
Nuclear Information & Resource Service
Southeast Office
P.O. Box 7586
Asheville, NC 28802

Talmage B. Clements
Manger - License Renewal
Nuclear Engineering Services
CP&L
410 South Wilmington St.
Raleigh, NC 27602

AGENDA
NEI LICENSE RENEWAL TASK FORCE MEETING WITH THE NRC STAFF
OCTOBER 9, 2002

1. Introduction: (9:00 A.M. - 9:15 A.M.)
   - Identification of attendees
   - Objectives

2. Proposed Standard LRA Section 3 Tables: (9:15 A.M. - 10:15 A.M.)
   - Industry presentation of modified tables
   - NRC comments/questions/recommendations

3. Proposed Standard LRA Section 3 Text Format: (10:15 A.M. - 11:15 A.M.)
   - Industry proposal
   - NRC comments/questions/recommendations

4. Comments from the Public

5. Break (11:30 A.M. - 1:00 P.M.)

6. Proposed Standard LRA Section 2 Format (tables and text): (1:00 P.M. - 2:00 P.M.)
   - Industry proposal
   - NRC comments/questions/recommendations

7. Industry issues: (2:00 P.M. - 3:00 P.M.)
   - Definition of “consistent with GALL”
   - Standard definition of component intended function
   - Level of detail for referencing GALL, Volume 2 (e.g., V.A.1-a vs. V.A.1.1, V.A..1.2, etc.)
   - Crossing of section boundaries to match materials, environments, programs, etc.
   - Potential discrepancies in GALL and/or SRP

8. Presentation of Reviewers’ Issues (Butch Burton): (3:00 P.M. - 3:20 P.M.)
   - NRC presentation of issues
   - Industry clarifying questions on issues (no open debate)

9. Closing: (3:20 P.M. - 3:30 P.M.)
   - Action items
   - Comments from the Public

Enclosure 1

LIST OF ATTENDEES FOR THE
NEI LICENSE RENEWAL TASK FORCE MEETING WITH THE NRC STAFF
OCTOBER 9, 2002

Name	**Organization**
Eric Blocher	Parsons
Garry G. Young	Entergy
Alan Cox	Entergy
Paul Aitken	Dominion
Bill Wetson	Dominion
Alvin Henry	NRC/NRR/DRIP/RLEP
Tony Grenci	CNS
Alan Nelson	NEI
Jim Knorr	NRC
Stewart Bailey	NRC/DE
Barry Elliot	NRC/DE
Sam Lee	NRC/NRR/DRIP/RLEP
Russ Arrighi	NRC/NRR/DRIP/RLEP
Richard Grumbir	AEP/CNP
Gary M. Adkins	TVA
Carey W. Fleming	Winston & Strawn
Jan E. Fridrichsen	Southern Nuclear
Jeff Mulvehill	Southern Nuclear
Fred Polaski	Exelon
Rani Franovich	NRC/NRR/DRIP/RLEP
S.K. Mitra	NRC/NRR/DRIP/RLEP
Gregory Twachtman	McGraw Hill
Goutam Bachi	NRC/NRR/DE
Y.C. (Renee)Li	NRC/NRR/DE
Noel Dudley	NRC/NRR/DRIP/RLEP
Raj Anand	NRC/NRR/DRIP/RLEP
William Burton	NRC/NRR/DRIP/RLEP
David Solorio	NRC/NRR/DRIP/RLEP
P.T. Kuo	NRC/NRR/DRIP/RLEP
Cliff Munson	NRC/NRR/DE/EMEB
Russ Wells	CNS
Peter J. Kang	NRC/NRR/DRIP/RLEP

Enclosure 2