



NUCLEAR ENERGY INSTITUTE

Alan P Nelson
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October 29, 2002

Dr. P.T. Kuo
Program Director
License Renewal and Environmental Impacts
Division of Regulatory Improvement Programs
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: Industry Response to the Proposed NRC Interim Staff Guidance
for Updating The Improved License Renewal Guidance
Documents

PROJECT NUMBER: 690 - This Correspondence Supersedes
Response of October 23, 2002 to Dr. Kuo.

Dear Dr. Kuo:

NEI has reviewed your July 30, 2002, Interim Staff Guidance 5 (ISG) titled "Staff Guidance for Updating the Improved License Renewal Guidance Documents" and has enclosed our comments. In general, NEI applauds the NRC for developing a document that provides guidance on the process for evaluating lessons learned from NRC staff review of prior applications. NEI's comments are intended to enhance and clarify NEI's vision for this process. Our most significant comments are as follows:

- We believe that the backfitting of license renewal evaluations fall into two distinct categories: those of the current term through the 10 CFR 50 regulations, and those of the extended period of operation. A license renewal backfit evaluation for current term might apply to plants whether or not a plant had applied for renewal.
- Second, we have suggested a clarification and an expansion of the Office of General Counsel's (OGC) role in the process. We believe that OGC should determine whether the ISG is providing an improvement

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to the process beyond the regulations thus constitutes a backfit; or whether the ISG represents a clarification that is necessary to comply with the regulations.

- Finally, we believe this document provides an opportunity to significantly improve the overall stability and predictability of the rule for future applicants. The method for providing this improvement rests with establishing a more formal process for determining whether those ISGs that do not pass a backfit evaluation should even be issued. We suggest that the NRC perform a formal evaluation of the ISG impact on stability and predictability of the change vs. the benefit and establish that there is a clear benefit with proceeding with issuing these ISGs.

NEI appreciates the opportunity to comment on this ISG and would be happy to meet with the NRC to further discuss these comments. If you have any questions, please call me (202) 739- 8110 or by e-mail (apn@nei.org).

Sincerely,

A handwritten signature in cursive script, appearing to read "Alan Nelson".

Alan Nelson

Enclosure

July 30, 2002

Mr. Alan Nelson
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Mr. David Lochbaum
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1707 H Street, NW
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SUBJECT: STAFF GUIDANCE FOR UPDATING THE IMPROVED LICENSE RENEWAL
GUIDANCE DOCUMENTS

Dear Messrs. Nelson and Lochbaum:

The purpose of this letter is to solicit comments on the proposed process by which the Nuclear Regulatory Commission (NRC) will update the improved license renewal guidance documents. The improved guidance documents consist of: NUREG 1801, "Generic Aging Lessons Learned (GALL) Report," NUREG 1800, "Standard Review Plan for License Renewal" (SRP-LR), Regulatory Guide 1.188, "Standard Format and Content for Applications to Renew Nuclear Power Plant Operating Licenses," and Nuclear Energy Institute NEI 95-10, "Industry Guideline for Implementing the Requirements of 10 CFR Part 54 - The License Renewal Rule." On October 11, 2001, the NEI License Renewal Task Force met with the NRC staff in Rockville, Maryland. During the meeting, the NRC staff and the NEI task force took an action item regarding the process for updating the improved license renewal guidance documents. By letter dated December 21, 2001, the staff provided its proposed guidance for updating the improved license renewal guidance. On February 25, 2002, the staff held a public meeting with NEI and other interested stakeholders to discuss the proposed process. By letter dated March 13, 2002, NEI provided their comments on the staff's proposed guidance. As a result of the meeting and the letter, the staff has revised the enclosed guidance. In addition, two new sections have been added, Section 4.2.5 to address implementation for current applicants, and Section 4.2.6 to evaluate the guidance for licensees with renewed licenses. For a timely implementation of this guidance, your comments are requested within 30 days of the date of this letter. Should you have questions, please contact Mr. Jack Cushing of my staff at (301) 415-1424.

Sincerely,

/RA/

Pao-Tsin Kuo, Program Director
License Renewal and Environmental Impacts Program
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

E

Project No. 690

Enclosure: As stated

cc w/encl. See next page

NUCLEAR ENERGY INSTITUTE

Project No. 690

cc:

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Guidance for Interim Staff Guidance Development

1.0 POLICY

Part 54 of Title 10 of the *Code of Federal Regulations* (10 CFR Part 54), hereafter referred to as "the rule," requires an applicant, that wants to extend a nuclear power plant operating license beyond the original licensing term, to submit a license renewal application (LRA). To facilitate the implementation of the rule and the review and inspection of programs and activities associated with an LRA, the staff has developed improved license renewal guidance (ILRG) documents

The license renewal program is a living program. The staff, industry, and other interested stakeholders gain experience and develop lessons learned with each renewed license. The lessons learned address the Agency's performance goals of maintaining safety, improving effectiveness and efficiency, reducing regulatory burden, and increasing public confidence. The lessons learned are captured in interim staff guidance (ISG) for use by the staff and interested stakeholders until the ILRG documents are revised

The ILRG documents are

- NUREG-1800, "Standard Review Plan for the Review of License Renewal Applications for Nuclear Power Plants" (SRP-LR)
- NUREG-1801, "Generic Aging Lessons Learned (GALL) Report"
- Regulatory Guide (RG) 1.188, "Standard Format and Content for Applications to Renew Nuclear Power Plant Operating Licenses"

In addition, the Nuclear Energy Institute (NEI) developed the following document that is endorsed in RG 1.188:

- NEI 95-10, Rev. 3, "Industry Guidelines for Implementing the Requirements of 10 CFR Part 54 - The License Renewal Rule"

The SRP-LR provides guidance to NRC staff reviewers in the Office of Nuclear Reactor Regulation (NRR). These reviewers perform safety reviews of applications to renew nuclear power plant licenses in accordance with the license renewal rule. The principal purposes of the SRP-LR are to ensure the quality and uniformity of staff reviews and to present a well-defined base from which to evaluate applicant programs and activities for the period of extended operation. The SRP-LR is also intended to make information about regulatory matters widely available, to enhance communication with interested members of the public and the nuclear power industry, and to improve the public's understanding of the staff review process. Each of the individual SRP-LR sections addresses (1) who performs the review, (2) the matters that are reviewed, (3) the basis for review, (4) the way the review is accomplished, and (5) the conclusions that are sought

Enclosure

The SRP-LR references the GALL report, which evaluates existing programs generically, to document (1) the conditions under which existing programs are considered adequate to manage identified aging effects without change and (2) the conditions under which existing programs should be augmented for this purpose. The GALL report should be treated as an approved topical report (as explained in NUREG-1739)

The purpose of RG 1.188 is to provide guidance to an applicant on the information to be submitted in an application for renewal of a nuclear power plant operating license in a uniform format that is acceptable to the NRC staff for structuring and presenting this information. It also endorses NEI 95-10, Rev. 3, as an acceptable method for implementing the requirements of the license renewal rule.

NEI 95-10 was developed by the NEI License Renewal Implementation Guideline Task Force and the NEI License Renewal Working Group for the implementation of the license renewal rule.

2.0 OBJECTIVES

This instruction ensures that proposed changes to the ILRG documents are properly evaluated, documented, and implemented. Further, this instruction establishes the responsibilities and authorities for the NRR staff in identifying changes to the ILRG using the ISG process.

This instruction provides NRR staff with the basic framework for processing ISGs. The goals of this instruction include the following

- To ensure the continued health and safety of the public
- To improve public confidence in the license renewal process
- To implement a documented and controlled license renewal review process, so as to reduce unnecessary regulatory burden
- To maintain a consistent, effective, and efficient review process

3.0 BACKGROUND

The ILRG documents have been developed to enhance the license renewal process. It is expected that, as lessons are learned during LRA reviews these guidance documents may need to be modified to capture new insights or address emergent issues. This process serves to expeditiously address specific areas in the ILRG documents that need to be revised and serve as a bridge until the entire document can be revised

Public participation is an important part of this process. The process as described in Section 4.0, gives the public opportunities to obtain information and to comment on the proposed ISG. The public will also be able to participate when the ILRG documents are revised to include the ISGs. Comments will be addressed and/or discussed in public meetings. An appeal process is under development for any stakeholder who may disagree with the position described in the ISG. The NRC will make ISGs available to the public by publishing on the NRC web site, in ADAMS, and by holding public meetings, as appropriate.

4.0 ISG PROCESS

4.1 Overview

The staff, industry, or interested members of the public (stakeholders) may comment or propose changes to information provided in an ILRG document. For some of the comments, the staff may need to develop and issue an ISG prior to the next update of the ILRG documents. The ISG will be incorporated into the periodic updates of the ILRG documents. For comments that do not result in an ISG, the ISG coordinator will evaluate the comments to determine if they should be included in the next revision of the ILRG documents.

The process for developing and implementing ISGs follows the guidance for developing new generic staff positions as set forth in NRR Office Letter No. 500, Revision 2, "Procedures for Controlling the Development of New and Revised Generic Requirements for Power Reactor Licensees," and Revision 7 to, "The Charter for the Committee to Review Generic Requirements (CRGR)." Failure to follow the ISG process will adversely affect the stability and predictability of the license renewal program. During the course of an LRA review, the staff may discover an issue that would expand the scope of the license renewal program and impose a new generic requirement on applicants for license renewal. The staff should not ask an applicant to address the new issue through a request for additional information (RAI) until an ISG has been issued. The ISGs have schedule implications for current and future applicants for license renewal and backfit implications for licensees with renewed licenses. Therefore, the structured approach described in this instruction must be followed.

The process is administered and controlled by the License Renewal Section in the License Renewal and Environmental Impacts (RLEP) Program, Division of Regulatory Improvement Programs (DRIP), NRR. Expected primary contributors to the process are, NRR, the Office of Nuclear Regulatory Research (RES), and the Office of the General Counsel (OGC).

The ISG coordinator and ISG lead project manager (PM) play vital roles in the overall review process. They are responsible for screening, documenting, planning, tracking, coordinating, and implementing resolutions of license renewal proposed ISGs. Technical reviewers will be assigned to support the development of the ISG.

The staff evaluating ISGs must be familiar with the following documents

- 10 CFR Part 54 and the associated statements of consideration (60 FR 22461 - 22495 as amended by 61FR65175 and 64FR72002)
- RG 1.188, "Standard Format and Content for Applications to Renew Nuclear Power Plant Operating Licenses"
- NUREG-1800, "Standard Review Plan for the Review of License Renewal Applications for Nuclear Power Plants" (SRP-LR)
- NUREG-1801, "Generic Aging Lessons Learned (GALL) Report"
- NEI 95-10, Revision 3, "Industry Guidelines for Implementing the Requirements of 10 CFR Part 54 - The License Renewal Rule,"

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In using these guidance documents, the staff, industry or member of the public may discover guidance that is unclear, incorrect, incomplete, or the need for new guidance. The comments can be provided to the ISG coordinator verbally, by e-mail or by letter. The ISG coordinator will

document the comment. Verbal comments that are resolved during a meeting only need to be documented if the comment will result in a proposed ISG. Once documented, the issue will be controlled by this process to ensure timely resolution. At any step during the process the proposed ISG can be modified or determined to be unnecessary. If the proposed ISG is determined to be unnecessary, the staff will document the closure of the issue in a letter to the interested stakeholders and the originator. If the ISG is approved, it will be published and placed on the NRC web site as an approved ISG. The ISG will be incorporated into the next revision of the ILRG documents. Appendix B to this instruction provides a flow chart of the process.

4.2 Processing License Renewal Proposed ISGs

The basic activities are as follows:

- Section 4.2.1 - Identify and Define License Renewal Proposed ISGs
- Section 4.2.2 - Develop an Evaluation plan
- Section 4.2.3 - Evaluation and Transmittal of Proposed ISG
- Section 4.2.4 - Resolution of the ISG
- Section 4.2.5 - Implementation of the Approved ISG
- Section 4.2.6 - Evaluation of ISGs for Licensees with Renewed Licenses

These basic activities are described in the sections below

4.2.1 Identify and Define License Renewal Proposed ISGs

The process starts when the NRC staff, industry, or members of the public submit a comment to the ISG coordinator to improve the ILRG documents. If the comment is identified by the staff, the originator will discuss the need for an ISG with the ISG coordinator to verify that development of the ISG is warranted. External stakeholder requests are expected to be brought to NRC's attention via letter, phone or e-mail. Once RLEP is notified, the issue will be referred to the ISG coordinator for review. The ISG coordinator screens, tracks and documents the comments. The screening process will group the comments into three categories:

Category 1: ILRG Document Updates Not Required

Staff guidance is already available, or it is determined that additional guidance is not necessary. The ISG coordinator will document closure and inform the originator.

Category 2: Update ILRG Documents at Next Revision

Category 2 comments are usually editorial comments or minor changes to the ILRG documents that improve the readability and consistency of the documents and would not cause a current or future applicant to revise their LRA. The ISG coordinator will ensure it is evaluated for inclusion in the next revision of the ILRG documents. The originator will be informed of the resolution.

Category 3: ISG Development Required

The comment will result in a staff position or guidance that needs to be communicated to external stakeholders, such as current or future applicants, so that they can address it in their LRA. The staff will commence developing the ISG in accordance with the guidance contained in this document. At any step during the process the proposed ISG can be modified or determined to be unnecessary. The ISG coordinator will document the proposed ISG closure and, if necessary, ensure it is included in the next revision of the ILRG documents

For categories 1 and 2, the proposed changes are unnecessary or of insufficient significance to warrant a formal ISG. The industry and the public will have an opportunity to comment on the proposed changes when the draft ILRG documents are issued for comment during the revision process. Category 3 changes have interaction with the industry and public built into the process.

Once a proposed ISG is received, the ISG coordinator will:

- Screen the proposed ISG to determine whether interim staff guidance is necessary. The ISG coordinator may involve technical branches from other NRR divisions or NRC offices during the evaluation of the issue.
- Arrange a conference call or public meeting, if needed, with the originator to obtain clarification of the proposed ISG.
- Request the originator to forward the basis for the proposed ISG in writing. The basis should include the need and the underlying regulatory requirement that the potential ISG is attempting to satisfy. The originator should, but is not required to, provide a markup of the ILRG to communicate their proposed resolution. External stakeholders should be encouraged to submit their comments in a letter or e-mail to the RLEP program director.
- Ensure that a written response has been provided to the originator within 30 days following receipt of the potential ISG. The response should indicate how the issue was previously resolved or the current status of the review. The final resolution should be provided to all interested stakeholders
- Track the proposed ISG through resolution

4.2.2 Develop an Evaluation Plan

Planning the processing of a proposed ISG is a critical step in ensuring that the review is completed in a timely and effective manner. The plan is intended to define the scope of the review, the resources needed for the review, and the schedule for resolution.

Developing the evaluation plan involves the following activities:

- The ISG coordinator should determine the due date for the issue resolution during the initial review and discuss this determination with the RLEP license renewal section chief for confirmation.
- The ISG coordinator should discuss the due date for the issue resolution with the originator.

- The RLEP license renewal section chief will assign an ISG lead PM for each proposed ISG to develop a proposed resolution.
- Upon acceptance of a proposed ISG, the ISG lead PM will obtain a technical assignment control (TAC) number, if necessary. This provides a means of tracking the resources expended and the work activities on each review. Separate TAC numbers are appropriate if significant resources (i.e., more than eight hours) are expected to be expended for the particular issue.
- The ISG lead PM will assess the proposed ISG to define the scope, resources, and schedule for resolution. This should include a discussion with the technical branch to determine if the proposed ISG should be evaluated for backfit for licensees with renewed licenses.
- The ISG lead PM will be responsible for coordinating the activities documented in the evaluation plan, monitoring the progress of these activities, and reporting the status of the review to the ISG coordinator for tracking by RLEP.
- The ISG lead PM will be responsible for obtaining clarification of the input from the originator or stakeholder. It is expected that the input will be clearly written with a proposed resolution for the identified concern. The input should, but is not required to include a markup of the guidance document that requires modification.
- The ISG coordinator will track and monitor the proposed ISG's progress toward resolution.

4.2.3 Evaluation and Transmittal of Proposed ISGs

4.2.3.1 Evaluation of Renewal Proposed ISGs

In most cases, the evaluation and development of a proposed resolution will be performed by NRR or RES technical branches. The memorandum transmitting the proposed ISG, from the branch chief of the technical branch to the RLEP program director, will specify, if the ISG involves adequate protection or compliance with the regulations and applies to licensees with renewed licenses (backfit evaluation initiated) or if the ISG is a clarification of how the staff interprets the regulations (no backfit required).

In each case, OGC will provide a review and determination of the ISG's consistency with the current regulations. In the cases where backfit considerations are involved, OGC's input should clearly indicate whether the ISG was developed to establish compliance with some regulatory provisions where the industry would not necessarily otherwise be in compliance or whether the ISG represents only an improvement or clarification that is beyond the interpretation of 10 CFR 50 or 10 CFR 54 requirements. On these issues, OGC determinations will be made available to the public (10CFR50.109).

If the technical branch chief has decided that the ISG is a potential backfit then the transmittal memorandum will contain a documented evaluation. The technical branch division director's concurrence in the memorandum is required. Refer to section 4.2.5 of this document for guidance on preparing the documented evaluation and the process for backfitting licensees with

renewed licenses. If the proposed ISG does not involve a potential backfit then the transmittal memorandum will be signed by the branch chief. Backfit issues will be forwarded to CRGR for further review. In these cases, CRGR will determine whether backfit is appropriate consistent with NRC standard policies and procedures.

If the ISG is determined to not constitute a potential backfit, then a further review should be done to determine if it should be issued. ISGs should be evaluated to determine whether they represent a minor rule clarification or a potentially significant change in the license renewal process. Minor rule clarifications can be issued without further evaluation, but an ISG that represents a potentially significant change in the license renewal process should be further evaluated. That evaluation should confirm that there is a clear benefit to issuing the ISG relative to affecting the stability and predictability of the rule.

The ISG lead PM will coordinate the review and the proposed resolution. OGC review of proposed ISG is required unless the change to the ILRG is editorial. The ISG lead PM assigned to resolve the proposed ISG is also responsible for coordinating the staff's evaluation with all involved branches and offices.

Proposed ISGs involving multiple branches and/or offices may result in scheduling and resource conflicts or staff disagreements on the proposed resolution. The ISG lead PM is responsible for notifying management and the ISG coordinator of these conflicts and for coordinating discussions that lead to a consensus staff position

Some proposed ISGs may involve policy issues that warrant Commission involvement. These issues can be identified at any time in the planning and evaluation process and need to be discussed with the RLEP program director as soon as the potential for a Commission-level issue is identified. RLEP will document the proposed ISG, the proposed options, and a staff recommendation before presenting the proposed ISG to management for submittal to the Commission. Upon receipt of the Commission's directions on the ISG, the staff will take the appropriate action implementing the Commission's decision.

4.2.3.2 Transmittal of Proposed ISGs

Once a proposed ISG is developed, it will be documented and transmitted to the originator and stakeholders for feedback. The following provides guidance for the format and content that should be used for all ISGs:

Issue Heading:

A short summary or description of the issue (one or two sentences). [Key word searches in ADAMS could be generated from the summary, so it is beneficial to be specific.]

Staff Position:

This section describes the proposed ISG and the proposed resolution.

Rationale:

This section should provide a description of the issue in sufficient detail such that an informed reader can understand the issue, its basis, significance, applicability (e.g., generic, BWRs only), and ramifications. The staff will document its analysis of the proposed ISG in terms of regulatory requirements, established staff positions, industry standards, or other relevant criteria

References:

List references mentioned in the ISG text. These could include the ASME and ANSI Codes, NUREGs, other ISGs, Part 54 subsections, and Regulatory Guides.

Attachments:

This section contains the staff's markup of existing or new guidance that implements or incorporates the staff's proposed resolution (including the SRP-LR, GALL, RG 1.188, and/or NEI 95-10) and should normally be provided for all changes

4.2.4 Resolution of the ISG

It is the ISG lead PM's responsibility to prepare a letter to solicit comments on the proposed resolution. The letter should be addressed to NEI (with a copy to the originator if different) and the Union of Concerned Scientists as the coordinator for public interest groups. Current license renewal applicants and other stakeholders on the license renewal service list will also receive a copy of the letter. Typically, the concurrence chain should include the technical organization supporting the ISG, the OGC, and the RLEP program director. The review and concurrence should ensure the quality and consistency of the proposed resolution. The division director of the Division of Regulatory Improvement Programs, will have final signature authority on all proposed resolution letters unless otherwise specified by NRR Office Instruction ADM-200, "Delegation of Signature Authority." Typically, the letter will request comments on the proposed ISG within a 60-day period. For complex issues, a longer comment period may be considered.

Comments should be provided in writing to the RLEP program director within the comment period. A public meeting or conference call (minutes to be published in ADAMS) may be conducted to clarify the concern. The staff will work with the stakeholder to resolve their comments. Should the staff and the stakeholder fail to reach agreement, the stakeholder may appeal to NRC management.

Once the originator and stakeholder(s) are in agreement with the proposed resolution, the proposed ISG will be considered resolved. The final resolution could be the approval or determination that the proposed ISG is unnecessary. The staff will post the approved ISG on the NRC License Renewal web page for staff and industry use. The resolution letter will also be available in ADAMS. At this point, the approved ISG will have a number designation and an implementation date. The ISG can then be referenced in an applicant's LRA or as part of the LRA regulatory review process. The ISG will be incorporated into the next revision of the ILRG documents.

4.2.5 Implementation of the Approved ISG

Implementation affects both future and current applicants. Future applicants will address the ISG in their LRA. To minimize the burden on both the staff and the applicants, the applicants under review at the time the ISG is issued will address the new guidance, unless the review has

progressed to within two weeks prior to the schedule date for requests for additional information. Applicants that did not address the ISG during their review process will be evaluated in accordance with the guidance in Section 4.2.6 of this instruction.

4.2.6 Evaluation of ISGs for Licensees with Renewed Licenses

If the staff has determined that the ISG involves adequate protection or compliance with 10 CFR 54, the License Renewal Rule, then the staff must evaluate the licensees with renewed licenses for a backfit. The backfit rule, 10 CFR 50.109, applies to licensees with renewed licenses. A generic backfit imposes a new or different applicable regulatory position (or positions) on more than one plant. Staff guidance regarding generic backfits is provided in NRR Office Letter No 500, Revision 2, and Revision 7 to, "The Charter for the Committee to Review Generic Requirements (CRGR)."

The backfit rule requires that the NRC justify each backfit with a documented evaluation or a regulatory analysis and specifies their use and contents. Compliance or adequate protection backfits require a documented evaluation. The documented evaluation performed under Section 4.2.3.1 for the ISG should be used for the documented evaluation required for backfit. Appendix C of the CRGR charter provides guidance on preparing the documented evaluation.

When the staff has made the decision to backfit the ISG, in accordance with OL-500 and the CRGR charter, then the staff will discuss the schedule for the affected licensees to address the backfit. There are two types of issues that may involve backfit consideration - those of current term and those of the extended period of operation only.

Issues involving 10CFR54 interpretations that do not in some way involve compliance with 10CFR50 regulations, are associated with the period of extended operation only. Therefore, the schedule for implementing the backfit will normally ensure that the backfit is completed prior to entering the period of extended operation. However, for plants already in their period of extended operation, the industry notice regarding compliance would provide schedular implementation provisions. The license renewal rule specifies that the licensees will include appropriate information in their FSAR update

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It is stated, under §54.37 Additional records and recordkeeping requirements.

(b) After the renewed license is issued, the FSAR update required by 10 CFR 50.71(e) must include any systems, structures, and components newly identified that would have been subject to an aging management review or evaluation of time-limited aging analyses in accordance with §54.21. This FSAR update must describe how the effects of aging will be managed such that the intended function(s) in §54.4(b) will be effectively maintained during the period of extended operation.

The license renewal rule is the responsibility of DRIP. Once the renewed license is issued, backfits of both types are the responsibility of the Division of Licensing Project Management (DLPM). However, since DRIP is knowledgeable about the issue, it will assist the technical branch preparation of the backfit package. During this process, DRIP will keep DLPM informed and will transmit the backfit package to DLPM with a recommended schedule for implementation.

5.0 RESPONSIBILITIES AND AUTHORITIES

All NRC staff members that participate in the review and inspection of license renewal programs and activities are responsible for reading, understanding, and applying the guidance in this instruction.

5.1 Roles and Responsibilities for the Review of ISG

A. GENERAL

Division of Regulatory Improvement Programs

The DRIP director is responsible for the overall development and implementation of the license renewal program and license renewal activities

License Renewal and Environmental Impacts Program

The RLEP program director is responsible for oversight of license renewal activities, process development activities, overall regulatory compliance (with the assistance of OGC), and implementation of the license renewal program.

The RLEP license renewal section chief is responsible for the general oversight and implementation of license renewal work planning activities. The RLEP license renewal section chief will provide direction and assistance in the development and approval of evaluation plans to ensure effective allocation of resources, responsiveness, and quality of work. The RLEP license renewal section chief assigns the ISG coordinator and the ISG lead PM

The ISG coordinator is responsible for the initial review of the proposed ISG. The ISG coordinator is also responsible for the tracking of the proposed ISG through to resolution.

The ISG lead PM is responsible for clarifying the issue with the originator, drafting or revising the assigned proposed ISG, obtaining a TAC number, working with the cognizant staff to address the issue, resolving any comments received during the ISG review process, and processing the draft or revised ISG through the various levels of review both inside and outside of RLEP.

Technical Branches

The technical branches evaluate the technical aspects of the proposed ISG. Staff involved with the review should be familiar with the requirements of the rule, the Commission guidance provided in the statements of consideration that accompanied the rule (60 FR 22461 - 22495), the review guidance in the SRP-LR, GALL report, RG 1.188, and the industry-developed guidance in NEI 95-10.

The technical branches are responsible for identifying and notifying RLEP of process concerns to improve existing guidance for developing, reviewing, and inspecting license renewal programs and activities. The technical branches are responsible for developing the backfit package for ISG requiring a backfit.

NRR Management

Division directors, program directors, and the regions will assist in resolving issues and concerns relating to the ISG including the schedules, resource allocation, priorities, and technical issues.

Offices/Divisions/Branches

Other offices, divisions, and branches are responsible for reviewing and concurring in a timely manner consistent with the established schedule.

OGC

Reviews ISG for consistency to regulations and provides input on whether backfit provisions are necessary for compliance

CRGR

Reviews backfit evaluations to assure acceptability prior to issuance

6.0 PERFORMANCE MEASURES

The ISG coordinator should provide an annual status update to the RLEP program director. The performance measures provide the following goals:

- Provide a written response to the originator on the status and potential resolution approach within 30 days of initial contact with RLEP.
- Issue 95 percent of the proposed ISG comment letters within 180 days of initial contact with RLEP.
- Issue 95 percent of the final ISG positions within 120 days of the end of the comment period provided in the comment letters.
- Issue 100 percent of the final ISG positions within two years of the initial contact with RLEP.

7.0 PRIMARY CONTACT

Jack Cushing, NRR/DRIP/RLEP
(301) 415-1424, JXC9@NRC.GOV

8.0 **RESPONSIBLE ORGANIZATION**

NRR/DRIP/RLEP

9.0 **EFFECTIVE DATE**

10.0 **REFERENCES**

1. 10 CFR Part 54, "Requirement for Renewal of Operating Licenses for Nuclear Power Plants "
2. Regulatory Guide 1.188, "Standard Format and Content for Applications to Renew Nuclear Power Plant Operating Licenses."
3. NUREG - 1800, "Standard Review Plan for the Review of License Renewal Applications for Nuclear Power Plants " (SRP-LR)
4. NUREG-1801, "Generic Aging Lessons Learned (GALL) Report."
5. NEI 95-10, Revision 3, "Industry Guidelines for Implementing the Requirements of 10 CFR Part 54 - The License Renewal Rule "

Appendix A: Change History

This is a new instruction.

APPENDIX B

INTERIM STAFF GUIDANCE MEMORANDUM PROCESS FLOW CHART

