

December 4, 2002

ORGANIZATION: Nuclear Energy Institute

SUBJECT: SUMMARY OF THE NOVEMBER 6, 2002, MEETING WITH THE
NUCLEAR ENERGY INSTITUTE (NEI) RE: STANDARD FORMAT FOR
LICENSE RENEWAL APPLICATIONS

On November 6, 2002, the staff held a public meeting with 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 an October 9, 2002, meeting. Enclosed are the agenda (Enclosure 1), the list of meeting attendees (Enclosure 2), meeting handouts (Enclosure 3), and guidance on time-limited aging analyses (TLAAs) (Enclosure 4).

The goal of the meeting was to establish an improved format for the LRA. The staff and NEI discussed Sections 2, 3, and 4, and Appendix B of the LRA. The staff made the following recommendations regarding Section 2, which were responded to in the following ways by NEI and the staff:

1) There are two kinds of "intended functions" normally used in the LRA; namely, the system-intended function and the component-intended function. The system-intended functions are used to identify portions of the system that meet 10 CFR 54.4 criteria. The component intended functions are used to perform aging management review and are listed in tables of both Section 2 and Section 3. The staff and NEI agreed that the column title in the tables could remain as is ("intended function") as long as the applicants are clear with respect to the system-intended function, in Section 2 of the LRA.

2) Describe the system-intended functions in the system description section of Section 2, as the system relates to 10 CFR 54.4 criteria. Provide a short explanation of why it meets the 10 CFR 54.4 criteria. NEI agreed with this comment.

3) Extensive system realignment in the application can cause confusion. Minor system realignment is acceptable, if the reason for the realignment and how it was accomplished is communicated to the staff. NEI agreed to review this comment and place an appropriate recommendation in its "Recommendations Document" (Action Item 1).

Since the emergency core cooling system (ECCS) and the containment isolation (CI) system examples are similar to the containment spray (CS) example, the staff recommended that they be replaced with an example from auxiliary systems; preferably one required to be in scope due to 10 CFR 54.4(a)(2). It is expected that this example would be contained in Section 2 only, since it is only needed to illustrate how a system description should address scoping criteria. It is expected that there will be no corresponding text or tables provided in Section 3 of the proposed standard LRA, since the existing examples in Section 3 are adequate.

Discussion of Section 3 of the LRA focused on the wording of standard notes that explain the type of correlation with NUREG-1801, Volume 1, "Generic Aging Lessons Learned (GALL) Report." The staff provided the following comments:

1) For the table notes, change the nomenclature such that the standard notes are lettered and the plant-specific notes are numbered. NEI agreed with this comment.

2) The first four notes should be clarified with respect to aging management programs (AMPs) as follows:

Note 1 (or A) - Consistent with NUREG-1801 item for component, material, environment, and aging effect. The AMP is consistent with NUREG-1801. NEI agreed with this comment.

Note 2 (or B) - Consistent with NUREG-1801 item for component, material, environment, and aging effect. The AMP takes some exceptions to NUREG-1801. NEI agreed with this comment.

Note 3 (or C) - Component is different, but consistent with NUREG-1801 item for material, environment, and aging effect. The AMP is consistent with NUREG-1801. NEI agreed with this comment.

Note 4 (or D) - Component is different, but consistent with NUREG-1801 item for material, environment, and aging effect. The AMP takes some exceptions to NUREG-1801. NEI agreed with this comment.

3) The staff would always expect to see a plant-specific note accompanying Note 9. NEI agreed with this comment.

NEI will inform the staff if they can develop Section 3 electrical and structural examples in time to meet the schedule. Examples provided are for illustrative purposes and will not be part of the final package (Action Item 2).

Previous LRAs had issues with communicating what "consistent with GALL" meant. The staff and the industry believe that the new LRA format, with the notes describing what area is not "consistent with GALL," and links to the AMP that describe the difference, will resolve this issue.

Section 4 of the LRA discusses TLAAs. The staff identified the environmental qualification TLAA in the R.E. Ginna LRA as an example of the detail the staff expects. The staff agreed to provide NEI with clarification on the level of detail expected in the TLAAs, specifically, reactor vessel neutron embrittlement (see Enclosure 4) (Action Item 3).

Appendix B of the LRA describes the AMPs. The staff had two comments on page B-10 of the handout. The first was under the exception heading. When an exception is being taken to GALL, not only should the exception be identified, but it should also be justified (e.g., the ASME code of record for the plant is a newer version of the ASME Code than the GALL recommends). The second comment concerns enhancements. If a program is enhanced to meet GALL, then an explanation of what the enhancement is (what element of the AMP is affected) and why it is necessary. NEI agreed with these Appendix B comments. NEI also agreed to clarify the title for Appendix B, Subsection B 3.0, on page B-19 (Action Item 4).

The staff and NEI discussed how to manage the commitments made in the LRA. NEI took the issue as an action item and will respond to the staff with a proposal (Action Item 5).

The staff requested that the applicant send in a draft of the LRA table of contents and a table listing the AMPs 60 days before the LRA is submitted. The AMP table should identify which AMPs are common to more than one system, which AMPs are system-specific, and whether they are existing, new, or enhanced programs. The reason for this request is that it will aid the staff in preparing for the review. NEI agreed to consider this request and place the appropriate recommendation in its "Recommendations Document" (Action Item 6).

NEI stated that they planned to submit the new LRA format package, which will include an electronic version with links by early December 2002 (Action Item 7).

NEI requested that the staff complete its review by early February 2003, to support the class of 2003.

The staff will decide whether to engage in a training session/workshop on the new LRA format after the format is approved (Action Item 8).

NEI informed the staff that the GALL format the applicants are currently using has reduced the burden on the industry. NEI expects the new format to further improve the effectiveness and efficiency of the review for the future applicants.

Action Items:

- 1) NEI agreed to consider the staff's system realignment concern and place an appropriate recommendation in its "Recommendations Document."
- 2) NEI will inform the staff if they can develop Section 3 electrical and structural examples in time to meet the schedule. Examples provided are for illustrative purposes and will not be part of the final package.
- 3) The staff will provide NEI with a description of the level of detail expected in the TLAAs LRA section by November 29, 2002.
- 4) NEI agreed to clarify the title for Appendix B, Subsection B 3.0. Suggestion: TLAA: Evaluation of Aging Management Programs Under 10 CFR 54.21(c)(1)(iii).
- 5) NEI will provide the staff with a proposal on how to manage the commitments made in the LRA.
- 6) NEI agreed to consider the staff's request that all applicants submit a draft of the LRA table of contents and a draft table listing the common and system-specific AMPs 60 days prior to LRA submittal, and place an appropriate recommendation in its "Recommendations Document."
- 7) NEI will submit the new LRA format package to the Director, Division of Regulatory Improvement Programs for concurrence, and will include an electronic version with links by early December 2002. The appropriate staff will be placed on concurrence.

8) The staff will decide whether to engage in a training session/workshop on the new LRA format after the format is approved.

A draft of this meeting summary was provided to NEI for comments.

/RA/

Jack S. Cushing, Project Manager
License Renewal Section
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

8) The staff will decide whether to engage in a training session/workshop on the new LRA format after the format is approved.

A draft of this meeting summary was provided to NEI for comments.

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Jack S. Cushing, Project Manager
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Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

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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

R. Assa

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
Montpelier, 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

Wednesday, November 6, 2002

License Renewal Application Standardization
Meeting Agenda

1. Introduction (8:30 A.M. - 8:45 A.M.)
 - Identification of attendees
 - Objectives
2. Section 2 Comments (8:45 A.M. - 9:00 A.M.)
3. Proposed Standard LRA Section 3 Tables: (9:00 A.M. - 10:00 A.M.)
 - Definition of "consistent with GALL"
 - Industry presentation of modified tables
 - NRC comments/questions/recommendations
4. BREAK (10:15 A.M. - 10:30 A.M.)
5. Proposed Standard LRA Section 3 Text Format: (10:30 A.M. - 11:15 A.M.)
 - Industry proposal
 - NRC comments/questions/recommendations
6. Comments from the public (11:15 A.M. - 11:30 A.M.)
5. LUNCH (11:30 A.M. - 1:00 P.M.)
7. Section 4 Level of Detail: (1:00 P.M. - 2:00 P.M.)
 - Industry proposal
 - NRC comments/questions/recommendations
8. Appendix B (2:00 P.M. - 2:30 P.M.)
7. Industry issues (2:30 P.M. - 3:15 P.M.)
8. Closing: (3:15 P.M. - 3:30 P.M.)
 - Action items
 - Comments from the public

LIST OF ATTENDEES FOR THE
NEI LICENSE RENEWAL TASK FORCE MEETING WITH THE NRC STAFF
NOVEMBER 6, 2002

<u>Name</u>	<u>Organization</u>
Jack Cushing	NRC/NRR/DRIP/RLEP
Alan Cox	Entergy
Eric Blocher	Parsons
Tony Menocal	Florida Power & Light
Steve Halg	Florida Power & Light
Mark Ackerman	FENOC
Paul Aitken	Dominion
Talmage Clements	Progress Energy - CP&L
Jan Fridrichson	Southern Nuclear
Russ Wells	CNS
Paige Nogus	GE Nuclear Energy
Alan Nelson	NEI
William R. Watson, Jr.	Dominion
John Rycyna	Constellation
Gary M. Adkins	TVA
Chang Li	NRC/NRR/DSSA/SPLB
Stewart Bailey	NRC/NRR/DE/EMEB
Sam Lee	NRC/NRR/DRIP/RLEP
T.J. Kim	NRC/NRR/DRIP/RLEP - Project Manager
Barry Elliot	NRC/NRR/DE/EMCB
Goutam Bagchi	NRC/NRR/DE
Peter J. Kang	NRC/NRR/DRIP/RLEP
S.K. Mitra	NRC/NRR/DRIP/RLEP
P.T. Kuo	NRC/NRR/DRIP/RLEP

MEETING HANDOUTS
(Accession No.: ML023400518)

TIME-LIMITED AGING ANALYSES

Enclosure 4

Information to be included in Section 4, TLAA, of the License Renewal Application

Section 4.2, Reactor Vessel Neutron Embrittlement - Provide sufficient information for the staff to confirm all Upper Shelf Energy (USE) and Adjusted Reference Temperature (ART) calculations for the period of extended operation.

All Applicants

Neutron Fluence: Identify the neutron fluence at the inside surface and the 1/4T location for each beltline material at the expiration of the license renewal period. Identify the methodology used in determining the neutron fluence and identify whether the methodology followed the guidance in Regulatory Guide (RG) 1.190.

To confirm the USE analysis meets the requirements of Appendix G of 10 CFR Part 50 at the end of the license renewal period.

a) For each beltline material that is projected to exceed 50 ft-lb at the end of the license renewal period, provide the unirradiated Charpy USE; the projected Charpy USE (at the end of the license renewal period); whether the drop in Charpy USE was determined using the limit lines in Figure 2 of RG 1.99, Revision 2 or from surveillance data; and the percentage copper.

b) If an equivalent margins analysis was required to demonstrate compliance with the USE requirements in Appendix G of 10 CFR Part 50, provide the analysis or identify an approved topical report that contains the analysis. Information the staff will require to assess the equivalent margins analysis includes: the unirradiated USE (if available) for the limiting material, its copper content, the fluence (1/4T and at 1 inch depth), the EOLE USE (if available), the operating temperature in the downcomer at full power, the vessel radius, the vessel wall thickness, the J-applied analysis for Service Level C and D, the vessel accumulation pressure, and the vessel bounding heatup/cool-down rate during normal operation.

Pressurized Water Reactors

To confirm the pressurized thermal shock analysis results in RT_{PTS} values below the screening criteria in 10 CFR 50.61 at the end of the license renewal period.

a) For each beltline material, provide the unirradiated RT_{NDT} , the method of calculating the unirradiated RT_{NDT} (either generic or plant-specific), the margin, the chemistry factor, the method of calculating the chemistry factor, the mean value for the shift in transition temperature, and the RT_{PTS} value.

b) If there are two or more data for a surveillance material that is from the same heat of material as the beltline material, provide analyses to determine whether the data are credible in accordance with RG 1.99, Revision 2, and whether the margin value used in the analysis is appropriate.

c) If there are two or more data for a surveillance material that is not from the same heat of material as the beltline material, provide analyses of the data to determine whether the data is consistent with the RG 1.99, Revision 2, methodology.

Boiling Water Reactors

- a) Evaluate beltline materials in accordance with Renewal Applicant Action Items 10, 11, and 12 in the staff's SER, for BWRVIP-74 (Letter to C. Terry dated October 18, 2001).
- b) Identify whether there are two or more surveillance materials available that are relevant to the RPV beltline materials. If there are two or more data for a surveillance material, provide analyses of the data to determine whether the data is consistent with the RG 1.99, Revision 2, methodology that was utilized in the BWRVIP-74 analyses.

Additional TLAAAs for BWRs:

Evaluate all TLAAAs identified in NRC Staff License Renewal SERs for BWRVIP programs.