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January 24, 2003

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: U.S. Nuclear Industry's Proposed Standard License Renewal
Application Format Package
Request NRC Concurrence

PROJECT NUMBER: 690

Dear Dr. Kuo:

Enclosed for the staff's concurrence is the "U.S. Nuclear Industry's Proposed Standard License Renewal Application Format Package." The industry requests that all NRC Departments integral to license renewal application review and concur with the proposed application process. Due to the interactions with the staff during the development stage and the experience gained to date we request staff review and concurrence in sixty days. NEI plans to include this format in future revisions to NEI 95-10 and will ultimately request NRC's endorsement in Regulatory Guide 1.188.

In 2001, the NEI License Renewal Task Force met with the NRC License Renewal Staff in an effort to demonstrate how NUREG-1801, Generic Aging Lessons Learned (GALL) Report, should be used by the 2002 license renewal applicants in their applications. Based on several meetings and correspondence, the NEI License Renewal Task Force and the NRC License Renewal Staff agreed in principle to a preferred format: the "Class of 2002" applications would use a format consistent with the "Plant X" approach, which resembled the OPPD Fort Calhoun Plant application.

Based on this understanding, several license renewal applications were submitted in 2002, which attempted to implement the preferred format requirements. However, the resulting utility applications were not entirely consistent, as evidenced by the formal and informal NRC Staff Requests for Additional Information (RAIs) related to technical content and level of detail. This result was contrary to the overall intent of implementing NUREG – 1801.

In July of 2002, a group of utility members formed a Standard License Renewal Application Task Force, under the coordination of the Nuclear Energy Institute (NEI). Since the team was made up of utilities that were planning to submit License Renewal Applications in 2003 and early 2004, the Task Force became known as the “Class of ’03.” The Task Force met periodically with NRC staff throughout the remainder of 2002. Building upon the lessons learned from the “Plant X and Plant Y” effort, and developed a new set of Section 3 tables. The industry and NRC staff representatives believe these tables contain the right amount of information, presented in the best way possible, in order to gain the maximum efficiency from the data presentation. Since the various sections of the LRA work together to present the necessary data, it would not have been enough to only develop standard Section 3 tables. Therefore, the Task Force also standardized as much of the rest of the application as was necessary to gain the maximum efficiency for future NRC reviews. The result is a proposed Standard License Renewal Application (SLRA) with examples of Section 2, Section 3, and Appendix B included. A “generic” Pressurized Water Reactor was used for all examples. This is not expected to be an issue for Boiling Water Reactor applicants, since the purpose of the examples is to illustrate format and what type of information should be included in the LRA, not technical content.

It is the industry’s expectation that all future applicants will use this guidance (as revised or incorporated into other industry documents) to develop their License Renewal Applications. The industry strongly urges NRC staff reviewers to honor this format and refrain from making special requests for format deviations based on personal preference. The industry understands that NRC staff reviewers must obtain all of the information necessary to conclude that there is reasonable assurance that the effects of aging on all in-scope SSCs will be adequately managed for the period of extended operation. To that end, each applicant is committed to supporting the review to the maximum extent possible. However, the industry believes that all necessary data should be able to be submitted within the proposed format and will work very hard to achieve that goal.

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This package contains the following items:

Section 2 description
Section 3 description
Appendix B description
Adobe Acrobat® PDF file of the proposed Standard License Renewal Application, including active hyperlinks where appropriate
Recommendations to Applicants for Enhancing NRC License Renewal Application (LRA) Review Efficiency

The NEI License Renewal Task Force (Class of 2003) appreciates the guidance and interactions provided by the NRC License Renewal Staff. In support of these efforts we believe the following goals have been met:

- Produce a standard License Renewal Application format for the integrated plant assessment (IPA) results required by 10 CFR Part 54.21 (a)(1).
- Better define a comprehensive method of incorporating NUREG-1801 into the applications so as to realize savings from reduced NRC review, consistent with the original purpose of the NUREG-1801.
- Enhance the format of information that should be presented in other portions of the license renewal applications to reduce the administrative burden on the NRC Staff during the safety evaluation report development phase.
- Based on these guidelines, the Class of 2003 applicants (and future applicants) can standardize the presentation of the license renewal applications, which should result in significant reduction in NRC review fees. The class of 2003 includes license renewal submittals for 10 reactors and between 2004 and 2005 another 11 reactors. The industry is confident that ultimately all licensees will renew their licenses.

NEI appreciates the opportunity to submit U.S. Nuclear Industry's Proposed Standard License Renewal Application Format Package 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,



Alan Nelson

Enclosure