



NUCLEAR ENERGY INSTITUTE

Alan P Nelson  
SENIOR PROJECT MANAGER,  
LICENSING  
NUCLEAR GENERATION

February 26, 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: Industry Response – Consolidated List of Commitments for License  
Renewal, December 16, 2002

Dear Dr. Kuo:

On December 16, 2002, NEI received your correspondence requesting that each license renewal applicant provide the staff with consolidated lists of commitments included in the application with appropriate cross references. The industry understands that these lists will be used for site inspections and not for comparison with other applicants.

The industry has agreed to identify the high level future commitments in their (U)FSAR supplement (Appendix A of the LRA). Examples of what is meant by 'high level' can be seen in the enclosures. If at a later date (e.g., during an inspection) the NRC needs to review all commitments made during the license renewal process, they can obtain this information from the plant's commitment tracking system.

It is possible that applicants may differ as to how they will transmit this consolidated list to the NRC outside of the LRA (e.g., the programs that govern NRC correspondence at some plants may contain additional requirements such as identifying commitments specifically in a cover letter to the LRA). NEI feels that the way in which the information is transmitted to the NRC outside of the LRA,

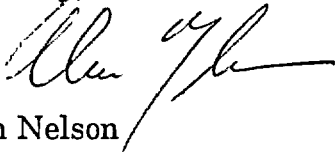


Dr. P.T. Kuo  
February 26, 2003  
Page 2

should remain a plant-specific preference and we are only recommending to our members that they identify their high level commitments in the (U)FSAR supplement section of the LRA. If plants decide to provide high level program descriptions (commitments) in the (U)FSAR supplement section of the LRA and identify other commitments in an attachment to the LRA cover letter that should be fine as well. PWR and BWR future commitments examples are provided in the enclosure.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Alan Nelson", written over a horizontal line.

Alan Nelson

Enclosures

**Pressure Water Reactor  
License Renewal Future Commitment Examples**

- Develop and implement inspection program for buried piping and valves
- Add pressurizer surge line to Augmented Inspection Program
- Add core barrel hold-down spring to Augmented Inspection Program
- Expand scope of Civil Engineering Structural Inspection to cover License Renewal requirements
- Revise plant documents to use inspection opportunities when inaccessible areas become accessible during work activities
- Incorporate NFPA-25, Section 2-3.1.1 for sprinklers
- Develop inspection criteria for non-ASME supports and doors
- Develop procedural guidance for inspection criteria that puts focus on aging effects
- Develop and implement inspection program for infrequently accessed areas
- Develop and implement inspection program for tanks
- Follow industry activities related to failure mechanisms for small-bore piping. Evaluate changes to inspection activities based on industry recommendations
- Follow industry activities related to core support lugs. Evaluate need to enhance inspection activities based on industry recommendations
- Inspect representative sections of polar crane box girders
- Follow industry activities related to reactor vessel internals issues such as void swelling, thermal and neutron embrittlement, etc. Evaluate industry recommendations
- Implement changes into procedures to assure consistent inspection of components for aging effects during work activities
- Incorporate groundwater monitoring into the civil engineering structural monitoring program. Consider groundwater chemistry in engineering evaluations of deficiencies

**Boiling Water Reactor  
License Renewal Future Commitment Examples**

- Evaluate any age related degradation found during recirculation system ISI inspections for applicability to the NSR portions of the recirculation system that was included in the scope of license renewal for NSR/SR.
- Notify the NRC whether Integrated Surveillance Program per BWRVIP-78 or plant specific program will be implemented
- Perform Inspection of carbon steel Component Supports (Other than ASME Class 1, 2, 3, and ASME Class MC component supports)
- Perform Inspection of SBO structural components
- Perform periodic reviews of calibration test results of electrical cables used in LPRM and WRM Instrumentation circuits to identify potential existence of aging degradation
- Perform inspection of outer sluice gates in the circulating water pump structure
- Perform inspection of hazard barrier doors in a sheltered environment for loss of material
- Perform inspection of RPV top guide
- Perform ultrasonic testing to detect wall thinning at susceptible locations in the ESW system stagnant piping in ECCS rooms
- Perform one-time inspection of a cast iron fire protection component for selective leaching
- Perform functional testing of sprinkler heads
- Perform inspection of electrical conduits in outdoor environment
- Perform inspection of Susquehanna substation wooden pole
- Perform one-time inspection of wall thickness of selected torus piping
- Perform inspection of PVC-insulated Fire Safe Shutdown cables in drywell
- Implement inspection program for Non-EQ accessible cables and connections, including fuse blocks

- Perform one-time piping inspection activities for standby liquid control system, auxiliary steam system, plant equipment and floor drain system, service water system, radiation monitoring system
- Perform one-time inspection of susceptible locations for loss of material in fuel pool cooling system to verify effectiveness of fuel pool chemistry activities
- Perform one-time inspection of carbon steel piping for loss of material in RPV instrumentation and Reactor Recirculation system
- Perform testing of inaccessible medium voltage cables
- Implement the final version of the fuse holder interim staff guidance when issued by the NRC.
- Implement fatigue management program
- Submit RPV P-T curves for 54 EFPY as license amendment
- Submit RPV circumferential weld examination relief request for 60 years
- Implement BWRVIP-76 when approved by the NRC and accepted by BWRVIP Committee