

May 19, 2005

Mr. Alex Marion
Senior Director, Engineering
Nuclear Generation Division
Nuclear Energy Institute
1776 I Street, NW., Suite 400
Washington, DC 20006-3708

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

SUBJECT: STATUS OF INTERIM STAFF GUIDANCE ASSOCIATED WITH LICENSE
RENEWAL

Dear Messrs. Marion and Lochbaum:

The purpose of this letter is to provide you with the current status of the interim staff guidances (ISGs) associated with license renewal. As you are aware, the staff is in the process of updating its license renewal guidance documents (LRGDs). The staff solicited comments on the following draft, updated LRGDs as posted on the NRC Web site on January 31, 2005:

NUREG-1800, "Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants"

NUREG-1801, "Generic Aging Lessons Learned (GALL) Report"

Draft Regulatory Guide (DG) -1140, "Standard Format and Content for Applications to Renew Nuclear Power Plant Operating Licenses," which endorses the industry license renewal document Nuclear Energy Institute (NEI) 95-10, "Industry Guideline for Implementing the Requirements of 10 CFR Part 54 - The License Renewal Rule," Revision 5, with two exceptions.

The draft LRGDs included completed ISGs as well as ISGs in development. The status and the staff resolution for ISGs 1 through 21 are presented in the enclosure. A summary of the status and staff resolution for these ISGs is provided below.

ISGs 1, 2, 3, 4 and 5 were incorporated into the draft LRGDs. These ISGs were completed and closed prior to the staff starting the update of the draft LRGDs.

ISGs 6, 13, 14, 15, 16, 17, 18, 20 and 21 staff positions were also incorporated in the draft LRGDs, which met the intent of the ISG process in providing the opportunity for the industry and public to comment on the draft LRGDs. Comments received will be resolved as part of the process to finalize the LRGDs. Since these ISGs have been incorporated into the draft LRGDs, the staff considers these ISGs withdrawn and closed.

ISG-07 is on hold until the staff completes its assessment of additional LRA review experience and remains open.

The staff considers ISG-08 and ISG-10 completed and closed. These ISGs are process related documents and do not need to be included in LRGDs.

ISG-09 was established to address scoping of non-safety related systems, structures, and components conducted for license renewal is in accordance with the requirement of 10 CFR 54.4(a)(2). On January 24, 2005, the staff issued Draft Regulatory Guide (DG) -1140, "Regulatory Guide for Standard Format and Content for Applications to Renewal," which endorses the industry license renewal document NEI 95-10, Revision 5, with two exceptions. The staff is in the process of preparing its final regulatory guidance. This ISG remains open.

ISG-11 was proposed by the industry to eliminate the fatigue evaluation of carbon/low alloy steel components for the effects of the reactor coolant environment. In a letter dated January 21, 2004, the staff concluded there is insufficient technical basis provided to justify the elimination of the fatigue evaluation of carbon and low alloy steel components for the effects of the reactor coolant environment. The staff considers this ISG closed.

ISG-12 was proposed to manage the aging effects of Class 1 small-bore piping. By letter dated November 3, 2003, the staff provided the opportunity to comment on the ISG that adds an aging management program (AMP), GALL XI.M35, "One-Time Inspection of Small-Bore Piping," for license renewal. The staff received NEI's written comments on July 15, 2004. NEI stated that the effects of aging for small-bore piping can be adequately addressed by GALL AMP XI.M32, "One-Time Inspection," and EPRI's MRP-24, "Interim Thermal Fatigue Management Guideline." NEI concluded that a new ISG to address this topic is not required. Part of the justification was that the ASME Section XI Code 2003 Addenda added requirements including volumetric examinations for a sample of small-bore Class 1 PWR safety injection piping welds most likely subjected to thermal fatigue. The staff reviewed NEI's comments and decided not to incorporate these comments. The staff believes that volumetric examinations of all inspection locations for piping less than NPS-4, should be on the basis of detailed evaluations of material susceptibility, operating environment, stress, and risk. GALL XI.M35, "One-Time Inspection of ASME Code Class 1 Small-Bore Piping," includes the staff's established position and will be added to the final LRGDs. The staff considers this ISG withdrawn and closed.

ISG-19 focuses on differentiating what will be needed to manage primary water stress corrosion cracking (PWSCC) in upper reactor vessel head penetration (VHP) nozzles (as established in NRC Order EA-03-009, "Issuance of Order Establishing Interim Inspection Requirements for Reactor Pressure Vessel Heads at Pressurized Water Reactors") from what will be needed to manage PWSCC in nickel-alloy components located in other portions of the reactor coolant pressure boundary (RCPB). ISG-19 will be implemented in two parts, ISG-19A and ISG-19B. The staff proposes to delete GALL AMP XI.M11 and issue two new AMPs in its place. GALL AMP XI.M11-A will include the staff's established position on managing PWSCC in upper reactor head penetration nozzles. GALL AMP XI.M11-B will be for managing PWSCC in nickel-alloy base metal and weld components located in the remaining portions of the RCPB.

ISG-19A, "Proposed Aging Management Program XI.M11-A, Nickel-alloy Penetration Nozzles Welded to the Upper Reactor Vessel Closure Heads of Pressurized Water Reactors (PWRs Only)," will be incorporated in the final LRGDs. The staff considers this ISG withdrawn and closed.

ISG-19B is currently under development. NEI and Electric Power Research Institute Materials Reliability Program (EPRI-MRP) is to develop an augmented inspection program for GALL AMP XI.M11-B, "Nickel-alloy Base-metal Components and Welds in the Reactor Coolant Pressure Boundary." This AMP will not be completed until after the NRC approves an augmented inspection program for nickel-alloy base metal components and welds as proposed by the ERPI-MRP. ISG-19B remains open.

Because of the changes to the LRGDs as discussed above, comparable changes might be needed to NEI 95-10, Revision 5. NEI is requested to review NEI 95-10 and propose updates to maintain consistency with the LRGDs.

If you have any questions regarding this matter, please contact the NRC Project Manager, Linh Tran, at 301-415-4103 or e-mail Int@nrc.gov.

Sincerely,

/RA/

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

Enclosure: As stated

ISG-19B is currently under development. NEI and Electric Power Research Institute Materials Reliability Program (EPRI-MRP) is to develop an augmented inspection program for GALL AMP XI.M11-B, "Nickel-alloy Base-metal Components and Welds in the Reactor Coolant Pressure Boundary." This AMP will not be completed until after the NRC approves an augmented inspection program for nickel-alloy base metal components and welds as proposed by the ERPI-MRP. ISG-19B remains open.

Because of the changes to the LRGDs as discussed above, comparable changes might be needed to NEI 95-10, Revision 5. NEI is requested to review NEI 95-10 and propose updates to maintain consistency with the LRGDs.

If you have any questions regarding this matter, please contact the NRC Project Manager, Linh Tran, at 301-415-4103 or e-mail lt@nrc.gov.

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Pao-Tsin Kuo, Program Director
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Office of Nuclear Reactor Regulation

Enclosure: As stated

DISTRIBUTION:

S. Lee
G. Cranston
N. Dudley
K. Cozens
M. Lintz
RLEP R/F

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OFFICE	PM:RLEP	PM:RLEP	PM:RLEP	LA:RLEP	PD:RLEP
NAME	L. Tran	J. Dozier	K. Chang (G.Cranston for)	Y. Edmonds (M.Jenkins for)	P.T. Kuo
DATE	05/11/05	05/11/05	05/19/05	05/18/05	05/19/05

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**Interim Staff Guidance (ISG) for License
Renewal
Status date: May 7, 2005**

Item No.	Purpose/ Description	Position ISG No. and Title	Status Resolution	Affected License Renewal Guidance Documents (LRGDs)
01	How to credit plant programs and activities	Clarification ISG-01, "Proposed Staff Guidance on the Position of the GALL Report Presenting One Acceptable Way to Manage Aging Effects for License Renewal," dated November 23, 2001 (ADAMS Accession No. ML013300531)	Closed Incorporated into draft LRGDs	SRP-LR, Chapter 3.0
02	Station blackout scoping Add station blackout scoping	Compliance ISG-02, "Staff Guidance on Scoping of Equipment Relied on to Meet the Requirements of the Station Blackout (SBO) rule (10 CFR 50.63) for License Renewal", dated April 1, 2002 (ADAMS Accession No. ML020920464)	Closed Incorporated into draft LRGDs	SRP-LR, Chapter 2.0
03	Concrete aging management program To clarify the concrete aging management programs in GALL and SRP-LR documents	Clarification ISG-03, "Proposed Revision of Chapters II and III of Generic Aging Lessons Learned (GALL) Report on Aging Management of Concrete Elements," dated November 23, 2001 (ADAMS Accession Nos. ML013300440 and ML013300445)	Closed Incorporated into draft LRGDs	GALL Volume 2, AMPs XI.S2, and XI.S6
04	Fire Protection System Piping To clarify AMP XI.M26 and AMP XI.M27	Clarification ISG-04, "Interim Staff Guidance (ISG)-04: Aging Management of Fire Protection Systems for License Renewal," dated December 3, 2002 (ADAMS Accession No. ML023440123)	Closed Incorporated into draft LRGDs	GALL Volume 2, AMPs XI.M26 and AMP XI.M27
05	Electrical Fuse Holder To include fuse clips and fuse block for fuse holders and to add a new AMP for fuse clips (i.e., metallic)	Compliance ISG-05, "Interim Staff Guidance (ISG)-5 on the Identification and Treatment of Electrical Fuse Holders for License Renewal," dated March 10, 2003 (ADAMS Accession No. ML030690492)	Closed Incorporated into draft LRGDs	SRP-LR, Table 2.1-5, GALL Volume 2, AMP XI.E5 (new)

Enclosure

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Item No.	Purpose/Description	Position ISG No. and Title	Status Resolution	Affected License Renewal Guidance Documents (LRGDs)
06	Housing for active components To clarify a need for aging management review (AMR) for housing for fans, dampers, and H/C coils	Compliance ISG-06, "Proposed Interim Staff Guidance on Identification and Treatment of Housing for Active Components for License Renewal," dated April 8, 2003 (ADAMS Accession No. ML031010423)	Withdrawn and Closed Will incorporate in final LRGDs (included in NEI 95-10, Rev. 5)	SRP-LR, Table 2.1-5, Chapter 3.0, and GALL Volume 2, IX.B Table
07	Scoping guidance To clarify the fire protection systems, structures, and components scoping. To clarify whether the scope would expand to include (BTP) APSCB 9.5-1	Clarification Proposed Staff Guidance on the Scoping of Fire Protection Equipment for License Renewal, dated November 13, 2002 (ADAMS Accession No. ML023190479)	Open - On-hold until staff completes its assessment of additional LRA review experience, meeting summary ltr, dated 10/02/03 (ADAMS Accession No. ML032801151)	
08	The ISG Process To update and establish the interim staff guidance process	Clarification Process for Interim Staff Guidance Development and Implementation, dated December 12, 2003 (ADAMS Accession No. ML023520620)	Closed	N/A
09	Scoping Criteria 54.4(a)(2) Scoping of non-safety related systems, structures, and components conducted for license renewal is in accordance with the requirement of 54.4(a)(2)	Clarification Industry Guidance on Revised 54.4(a)(2) Scoping Criterion for license renewal, dated June 6, 2003 (ADAMS Accession No. ML031570613) Draft Regulatory Guide (DG)-1140, Standard Format and Content for Applications to Renew Nuclear Power Plant Operating License, dated January 24, 2005 (ADAMS Accession No. ML050230010)	Open - Draft Regulatory Guidance -1140 endorsed NEI 95-10, Rev. 5 with 2 exceptions	

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10	<p>License Renewal Application Format</p> <p>To standardize license renewal application format for 2003 applicants</p>	<p>Clarification</p> <p>Standardized Format for License Renewal Application, April 7, 2003 (ADAMS Accession No. ML030990204)</p>	Closed	N/A
11	<p>Environmental Fatigue for Carbon/Low-Alloy steel</p> <p>To review the aging management of environmental fatigue in the ISG process, as agreed at the September 18, 2002, meeting: eliminate evaluation of carbon and low alloy steel components for the effects of the reactor coolant environment for LRA.</p>	<p>Clarification</p> <p>Evaluation of Proposed Interim Staff Guidance (ISG)-11: "Recommendations for Fatigue Environmental Effects in a License Renewal Application," dated January 21, 2004 (ADAMS Accession No. ML040220124)</p>	<p>Closed</p> <p>Staff concluded there is insufficient technical basis provided to justify the elimination of the evaluation of carbon and low alloy steel components for the effects of the reactor coolant environment for LRA</p>	N/A
12	<p>Cracking of Class 1 small-bore piping</p> <p>To capture the operational experience related to the cracking of Class 1 small-bore piping</p>	<p>Clarification</p> <p>Proposed Interim Staff Guidance (ISG)-12: "Addition of Generic Aging Lessons Learned (GALL) Aging Management Program (AMP) XI.M35, 'One-time Inspection of Small-bore Piping,' for License Renewal," dated November 3, 2003 (ADAMS Accession No. ML033100516)</p>	<p>Withdrawn and Closed</p> <p>Will incorporate in final LRGDs</p>	GALL Volume 2, AMP XI.M35 (new) and corresponding AMR line items

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13	The loose parts monitoring system To review the use of the loose parts monitoring (XI.M14) system for the management of the loss of preload on reactor vessel internal bolting	Clarification ISG-13	Withdrawn and Closed Incorporated in draft LRGDs - Remove pointer to AMP XI.M14 in the AMRs	GALL Volume 2, corresponding AMR line items
14	Cracking in Bolting To capture the operational experience related to the cracking of bolting	Clarification ISG-14	Withdrawn and Closed Incorporated in draft LRGDs - Revised GALL AMP XI.M18 and selected AMRs portion	GALL Volume 2, AMP XI.M18 and the corresponding AMRs line items
15	To incorporate NEI's proposed revision to GALL AMP XI.E2 (i.e., replaced TS surveillance with specific calibrations or surveillance)	Clarification ISG-15, "Proposed Interim Staff Guidance (ISG)-15: Revision of Generic Aging Lessons Learned (GALL) Aging Management Program (AMP) XI.E2, 'Electrical Cables Not Subject to 10 CFR 50.49 Environmental Qualification Requirements Used in Instrumentation Circuits', for License Renewal," dated August 12, 2003 (ADAMS Accession No. ML032250579)	Withdrawn and Closed Incorporated in draft LRGDs	GALL Volume 2, AMP XI.E2
16	To maximize the efficiency of the LRA review process and minimize RAls using time-limited aging analyses (TLAA) supporting information	Clarification ISG-16, "Proposed Interim Staff Guidance (ISG)-16: Time-limited Aging Analyses (TLAAs) Supporting Information for License Renewal Applications" dated May 12, 2003 (ADAMS Accession No. ML031320798)	Withdrawn and Closed Incorporated in draft LRGDs	SRP-LR Chapter 4

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17	<p>Bus ducts</p> <p>To review bus insulation due to water intrusion in bus ducts and bus bar connection due to thermal cycles; To develop GALL AMP XI.E4 for bus ducts</p>	<p>Clarification</p> <p>ISG-17, "Interim Staff Guidance (ISG)-17: Proposed Aging Management Program (AMP) XI.E4, 'Periodic Inspection of Bus Ducts', for License Renewal."</p> <p>See FRN /Vol. 69, No. 246, Page 76960, dated December 23, 2004.</p>	<p>Withdrawn and Closed</p> <p>Incorporated in draft LRGDs</p>	GALL Volume 2, AMP XI.E4 (new) and corresponding AMR line items
18	<p>Inaccessible cable</p> <p>To develop aging management procedure to prevent moisture collection in man hole and to revise GALL AMP XI.E3</p>	<p>Clarification</p> <p>ISG-18</p>	<p>Withdrawn and Closed</p> <p>Incorporated in draft LRGDs - revision to GALL AMP XI.E3</p>	GALL Volume 2, AMP XI.E3
19A	<p>Nickel-alloy</p> <p>Revise aging management program XI.M11 to include nickel-alloy upper vessel heads (primary water stress corrosion cracking in nickel-alloy upper reactor vessel head penetration nozzles)</p>	<p>Clarification</p> <p>ISG-19A: "Proposed Aging Management Program XI.M11-A, 'Nickel-alloy Penetration Nozzles Welded to the Upper Reactor Vessel Closure Heads of Pressurized Water Reactors (PWRs Only)', for License Renewal."</p>	<p>Withdrawn and Closed</p> <p>Will incorporate in final LRGDs</p>	GALL Volume 2, AMP XI.M11-A (new) and corresponding AMR line items
19B	<p>Cracking of nickel-alloy components in the reactor coolant pressure boundary</p>	<p>Clarification</p> <p>ISG-19B, "Proposed Aging Management Program XI.M11-B, 'Nickel-alloy Base-metal Components and Welds in the Reactor Coolant Pressure Boundary', for License Renewal."</p>	<p>Open - On-hold until NEI and EPRI-MRP activities completed</p>	

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20	Steam Generator Tube Integrity Revise aging management program XI.M19 to include steam generator tube integrity	Clarification ISG-20	Withdrawn and Closed Incorporated in draft LRGDs, Revision to XI.M19	GALL Volume 2, AMP XI.M19
21	Reactor Vessel Internals Revise Chapter IV tables, AMP XI.M9 and AMP XI.M16, to provide improved guidance on reactor vessel internals	Clarification ISG-21	Withdrawn and Closed Incorporated in draft LRGDs - Revision to XI.M9 and deletion of XI.M16; and corresponding AMR line items	GALL Volume 2, AMP XI.M9 and corresponding AMR line items
22	Lower Plenum Components To address thermal aging embrittlement of CASS components	Clarification An ISG is not needed	Closed Staff concluded that GALL adequately addressed this issue - no ISG is needed	
23	Replacement Parts necessary to meet 10 CFR 50.48 (Fire Protection) To provide guidance on how to handle replacement parts for 10 CFR 50.48		Open To determine if an ISG is necessary	