

July 19, 2005

ORGANIZATION: Nuclear Energy Institute (NEI)

SUBJECT: SUMMARY OF A CONFERENCE CALL HELD ON MAY 27 2005,  
BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION (NRC)  
STAFF AND THE NUCLEAR ENERGY INSTITUTE (NEI) TO DISCUSS  
PROPOSED CHANGES TO NEI 95-10, "INDUSTRY GUIDELINE FOR  
IMPLEMENTING THE REQUIREMENTS OF 10 CFR PART 54 - THE  
LICENSE RENEWAL RULE," REVISION 5

On May 25, 2005, the NRC staff held a conference call with Nuclear Energy Institute (NEI) and industry representatives to discuss the proposed changes to NEI 95-10, Revision 5. This was a follow-up call to the meeting held on May 16, 2005.

Enclosure 1 provides a list of conference call participants. Enclosure 2 is the proposed changes to NEI 95-10, Revision 5 (provided by NEI). The proposed changes, Items 1 thru 7 were discussed during the conference call. Item 8 was not discussed.

NEI also indicated that it will submitted NEI 95-10, Revision 6 for staff review and approval.

*/RA/*

Linh Tran, Project Manager  
License Renewal Section B  
License Renewal and Environmental Impacts Program  
Division of Regulatory Improvement Programs  
Office of Nuclear Reactor Regulation

Enclosures: As stated

cc w/encls: See next page

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| DATE   | 07/11/05 | 07/11/05 | 07/07/05   | 07/19/05   |

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**LIST OF PARTICIPANTS FOR CONFERENCE CALL  
TO DISCUSS PROPOSED CHANGES TO NEI 95-10**

**May 27, 2005**

**Participants**

Steve Hoffman  
Kurt Cozens  
Amy Hull  
Renee Li  
Greg Galletti  
Linh Tran  
Tomeka Terry  
Mark Lintz  
James Ross  
Steven Schellin  
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Eric Blocher  
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Nuclear Energy Institute (NEI)  
Nuclear Management Company, LLC (Point Beach)  
Exelon Corporation  
Parsons Power  
Entergy Nuclear  
Entergy Nuclear  
Southern Nuclear Operating Company  
Dominion Resources, Inc.

**NEI 95-10, Revision 6 Proposed Changes  
Submitted by NEI**

1. Appendix F Section 5.2.3.1 Exposure Duration

**Proposed Change:**

This section will be deleted in its entirety from Revision 6 of 95-10.

**Justification:**

NRC has not approved exposure duration as a method to remove non-safety-related (NSR) components from the scope of license renewal. Use of exposure duration for Criteria (a)(2) scoping will be a plant-specific determination. Proposed change will remove an exception from the DG-1140 endorsement of NEI 95-10.

2. Appendix F Section 4.0 Non-Safety Related Structure, System and Components (SSCs) Directly Connected to Safety Related SSCs - Equivalent Supports Bounding Approach Discussion.

**Proposed Change:**

This section has been revised to indicate methods and associated basis that can be generically applied and those that require a plant-specific justification. See Exhibit 1 for proposed revision.

**Justification:**

Proposed change will remove an exception from the DG-1140 endorsement of NEI 95-10.

3. Appendix E - Interim Staff Guidance Documents

**Proposed Change:**

The content of this Appendix will be deleted. The introduction page will be revised as follows:

**Appendix E**

**Interim Staff Guidance Documents**

Note: Interim Staff Guidance Documents (ISGs) are available on the NRC's License Renewal Guidance Documents Web site.

**Justification:**

NRC will be revising the NRC's License Renewal Guidance Documents web page to provide ISG information required to support license renewal application (LRA) inputs. Status and access to this information was previously contained in NEI 95-10 Appendix E. Requires NRC confirmation - as an alternative, the Appendix could be updated based on input from the NRC.

4. Section 1.4 - Utilization of NUREG-1800, NUREG-1801, Regulatory Guide 1.188 and NRC Interim Staff Guidance Documents (5th paragraph).

**Proposed Change:**

Delete reference to NEI 95-10 Appendix E, add reference to the NRC's Web site, and revise the fifth paragraph as follows:

(Changes shown in underline and italics)

"Changes and clarifications to the above guidance documents suggested by license renewal stakeholders and approved by the staff can be communicated via interim staff guidance (ISG) documents. The process is described in a December 21, 2001, NRC letter, ISG-8. ISGs that have not been incorporated into license renewal guidance documents should be considered by applicants. Details about each of the ISGs are available on the NRC License Renewal Guidance Documents Web site."

**Justification:**

NRC will be revising the NRC's License Renewal Guidance Documents web page to provide ISG information (status and access) contained in NEI 95-10 Appendix E.

5. Table 6.2-2 Guidance for Preparing the Standard License Renewal Application Format Section 2.1 Scoping & Screening Methodology (last guidance bullet)

**Proposed Change:**

Delete reference to Appendix E in the last bullet.

**Justification:**

NRC will be revising the NRC's License Renewal Guidance Documents Web site to provide ISG information (status and access) contained in NEI 95-10 Appendix E.

6. Appendix B - Typical Structure, Component and Commodity Groupings And Active/Passive Determinations For The Integrated Plant Assessment

**Proposed Change:**

Revise Line Items #116 and #124 as noted on Exhibit 2

**Justification:**

Provides additional clarification consistent with the intent of ISG-6, Identification and Treatment of Housings for Active Components.

7. Table 4.2-2, NUREG-1801 Consistency Notes for Aging Management Review Results

**Proposed Change:**

Revise Standard Note E to read:

(changes shown by italics and underline)

"Consistent with NUREG-1801 item for material, environment and aging effect, but a different aging management program or plant-specific aging management program is credited."

**Justification:**

NRC will no longer consider plant-specific programs identified by NUREG-1801 to be Consistent with NUREG-1801 per Standard Notes A through D.

8. Table 6.2-2 Guidance for Preparing the Standard License Renewal Application Format, Section 1.0 Administrative Information

**Proposed Change:**

The financial qualifications information has been deleted from the first paragraph of Section 1.0.

**Justification:**

Part 54.19 does not require financial qualification information for non-utility applicants.

**Exhibit 1**  
**Changes to Appendix F Section 4.**

**4. Non-Safety Structure, System and Components (SSCs) Directly Connected to Safety-Related SSCs**

For non-safety SSCs directly connected to safety-related SSCs (typically piping systems), the non-safety piping and supports, up to and including the first equivalent anchor beyond the safety/non-safety interface, are within the scope of license renewal per 54.4(a)(2). For this purpose the applicant must define the “first seismic or equivalent anchor” such that the failure in the non-safety related pipe run beyond the first seismic or equivalent anchor will not render the safety-related portion of the piping unable to perform its intended function under current licensing basis (CLB) design conditions. The applicant must be able to describe the structures and components that are part of the non-safety-related (NSR) piping segment up to and including the first seismic or equivalent anchor. The following applies:

- 4.1 A seismic anchor is defined as a device or structure that ensures that forces and moments are restrained in three (3) orthogonal directions.
- 4.2 An equivalent anchor may be defined in the CLB (i.e., UFSAR or other CLB documentation) and thus can be credited for the 10 CFR 54.4(a)(2) evaluation.
- 4.3 An equivalent anchor may also consist of a large piece of plant equipment (e.g., a heat exchanger) or a series of supports that have been evaluated as a part of a plant-specific piping design analysis to ensure that forces and moments are restrained in three orthogonal directions.
- 4.4 There may be isolated cases where an equivalent anchor point for a particular piping segment is not clearly described within the existing CLB information or original design basis. In those instances, the applicant may use a combination of restraints or supports such that the NSR piping and associated structures and components attached to safety related (SR) piping is included in scope up to a boundary point that encompasses at least two (2) supports in each of three (3) orthogonal directions.

An alternative to specifically identifying a seismic anchor or series of equivalent anchors that support the SR/NS piping interface is to include enough of the NS piping run to conservatively encompass these anchors and ensure the piping and anchor intended functions are maintained. The intended function consists of two facets: 1) Providing structural support for the SR/NS interface and; 2) Ensuring NS piping loads are not transferred through the SR/NS interface. Piping analysts use industry accepted practices as defined in their respective utility procedures to create pipe stress analysis models. The following methods (a) thru (c) are generically used to establish the end of pipe stress analysis models and can be used to define conservative end points for the portion of non-safety-related piping attached to safety-related piping to be included in the scope of license renewal.

- a. A base-mounted component (e.g., pump, heat exchanger, tank, etc.) that is a rugged component and is designed not to impose loads on connecting piping. The LR scope should include the base-mounted component as it has a support function for the SR piping.

Basis: A base-mounted component would either constitute an analysis endpoint as an anchor, or would be restricted from significant loading to or from the piping system based on the load carrying capacity of the component (such as a thin-walled tank). In the first case, the analysis endpoint and the LR boundary endpoint coincide such that the LR boundary envelops the analysis. For the second case, since the equipment is mounted to the structure and component loading is limited based on the component design, significant reactions cannot be transmitted to the piping system. The piping system support design would be required to provide adequate support prior to the component nozzle attachment. Therefore, the analysis endpoint is established prior to the piping system reaching the equipment nozzle, and the LR boundary (which includes the base-mounted component) envelops the analysis. When the LR boundary endpoint is established at a base-mounted component, the base-mounted component and supporting structure are included in the scope of license renewal.

- b. A flexible connection is generally considered a pipe stress analysis model end point because the flexible connection does not support loads or transfer loads across it to connecting piping.

Basis: Expansion joints and flexible hoses are designed such that significant piping system loads are not transferred across the connection. For this reason, the piping system is adequately supported to allow analysis endpoints to be established prior to the flexible connection. Therefore, establishing the LR boundary endpoint at flexible connections ensures that the analysis endpoint is enveloped.

- c. A free end of NS piping, such as a drain pipe that ends at an open floor drain.

Basis: The piping analysis cannot continue past a free end of the piping run. Therefore, establishing the LR boundary endpoint at the free end of the NS piping run ensures that the analysis endpoint is enveloped.

On a plant-specific basis, an applicant may also elect to use methods (d) and (e) to define conservative end points for the portion of non-safety-related piping attached to safety-related piping to be included in the scope of license renewal. The plant-specific basis should be documented in a retrievable and auditable format and summarized in the license renewal application.

- d. A point where buried piping exits the ground. The buried portion of the piping should be included in the scope of LR. A determination that the buried piping is well founded on compacted soil that is not susceptible to liquefaction must be made on a plant-specific basis.

Basis: The ground acts like an anchor if the buried piping is well founded on compacted soil that is not susceptible to liquefaction. Buried portions of piping runs for this condition are considered anchor points in the piping analyses. Since the analysis would consider the buried portion of piping as an anchor point, the establishment of the LR boundary endpoint where the piping run returns to above-grade ensures that the analysis endpoint is enveloped.



- e. A smaller branch line where the moment of inertia ratio of the larger piping to the smaller piping is equal to or greater than the acceptable ratio defined by the current licensing basis, because significantly smaller piping does not impose loads on larger piping and does not support larger piping. The moment of inertia ratio must be determined on a plant-specific basis.

Basis: The smaller diameter piping load carrying capacity is significantly less than that of the larger piping such that the larger piping is not adversely affected by the smaller line loads. The moment of inertia factor should be consistent with the plant-specific piping design basis. Therefore, establishing the LR boundary endpoint using this criterion ensures that the analysis endpoint is enveloped.

In some cases NS piping runs are connected at both ends to SR piping. In this situation the licensee may include the entire run of NS piping.

Extending the LR scope along the NS piping to these boundaries will ensure that NS piping up to a seismic anchor or equivalent anchor or the entire run of NS piping is included within the scope of LR.

**Exhibit 2**  
**Changes to Appendix B**

|     |        |  |                |
|-----|--------|--|----------------|
| 116 | Valves | Dampers, <i>louvers</i> , and <i>gravity dampers</i> | Yes (Housings) |
|-----|--------|--|----------------|

**Discussion:**

Recommend changing as noted with italic text.

|     |      |   |                |
|-----|------|---|----------------|
| 124 | Fans | Ventilation Fans<br>( <i>includes intake fans, exhaust fans, and<br/>purge fans</i> ) | Yes (Housings) |
|-----|------|---|----------------|

**Discussion:**

Recommend changing as noted with italic text.

## NUCLEAR ENERGY INSTITUTE

Project No. 690

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