

April 14, 2006

ORGANIZATION: Nuclear Energy Institute (NEI)

SUBJECT: SUMMARY OF THE LICENSE RENEWAL TELEPHONE CONFERENCE
CALL AND MEETING HELD BETWEEN THE U.S. NUCLEAR
REGULATORY COMMISSION (NRC) STAFF AND THE NUCLEAR
ENERGY INSTITUTE (NEI) LICENSE RENEWAL TASK FORCE

The U.S. Nuclear Regulatory Commission (NRC) staff and the Nuclear Energy Institute (NEI) License Renewal Task Force held a public telephone conference call and meeting on January 31, 2006, to discuss generic license renewal topics, lessons learned from the audit process, and license renewal process improvements. Enclosure 1 provides a listing of the conference call participants. Enclosure 2 contains the agenda for the conference call. A summary of the discussions follows:

1. New issues under development within the NRC that may affect license renewal
 - a. Review of later American Society of Mechanical Engineers (ASME) Code editions and addenda as applicable to license renewal

The NRC staff has collected and identified changes in the ASME Boiler and Pressure Vessel Code, Section XI, between: (1) the 1995 Edition and the 1998 Edition/2000 Addenda, (2) the 1998 Edition/2000 Addenda and the 2001 Edition/2003 Addenda, and (3) the 2001 Edition/2003 Addenda and the 2004 Edition. The information was collected to support the staff's endorsement, conditional endorsement, or rejection of the aforementioned changes.

The NRC staff reviewed comparison of changes in various editions and addenda of the ASME B&PV Code Section XI previously performed by the staff, ASME personnel, and specific applicants. The staff found three changes that were aging management related. All three changes were found acceptable with one based on an acceptable alternative to volumetric examination. Based on this review, the changes in Subsections IWB, IWC, IWD, IWE, IWF, and IWL of ASME B&PV Code Section XI (1998 Edition, 1999 Addenda, 2000 Addenda, 2001 Edition, and 2003 Addenda) were all acceptable. An applicant may use any one as acceptable alternatives to the edition and addenda referenced in the Generic Aging Lessons Learned (GALL) Report aging management programs without the need to submit these alternatives for NRC review in its plant-specific license renewal application. However, currently approved relief requests are not acceptable as a justification for taking exception to a GALL Report recommendation. For these exceptions, the technical basis for the exception must be provided in the application.

The rule change endorsing the 2004 Edition of Section XI of the ASME Code is in the final process of NRC concurrence cycle, and was not included in the staff review described above.

b. Interim Staff Guidance web page update

The NRC's license renewal web page contains the Interim Staff Guidance (ISG) positions that were incorporated into the September 2005 update of the license renewal guidance documents. It was agreed that these ISGs would be removed and only current ISGs would be posted on the web page until they are incorporated into the next guidance document update. The web page was subsequently updated to remove the ISGs incorporated into the revised guidance documents.

c. Potential ISG

In the December 20, 2005, telephone conference call, the NRC staff identified the potential need for an ISG concerning corrosion of boiling water reactor, Mark I, drywell steel containment shells. A separate telephone conference call and meeting was held on January 31, 2006, to discuss this subject.

2. Lessons learned from recent safety review audits

A regular agenda item for the monthly telephone conferences or meetings is for the staff and applicants to discuss lessons learned from recent safety review on-site audit activities. This discussion provides real-time feedback to applicants entering the audit phase for their applications or for use by future applicants. Observations from recent audits include:

NRC staff observations from Oyster Creek and other recent audits

- a. The audit team thought it was good for future applicants to observe the audit process, as was done by the staff for Susquehanna, Palo Verde, Wolf Creek, Beaver Valley, and the STARS business unit at the Oyster Creek audit. The Oyster Creek audit went well, and subsequent applicants could model their audit preparations on what was done by the applicant for Oyster Creek and also by the applicant for Nine Mile Point.
- b. It is important for a successful and efficient audit to have complete program basis documents.
- c. The Oyster Creek basis documents in each aging management program (AMP) binder were good in that they were clearly written and the binders were well-organized.
- d. Another positive is that the Oyster Creek basis documents contained very thorough discussions of operating experience and industry experience for each AMP.
- e. There should be cross references between the plant basis documents if there is overlap between documents.
- f. The binders for each Oyster Creek AMP were considered very comprehensive because they contained the basis document and all documents referenced by the AMP in the application.
- g. The official basis document should be in the binder rather than a working document.

- h. It is advantageous to have the information provided in the binders also in electronic format as well as on paper. Electronic format helps audit team members prepare their audit report input by allowing them to copy the pertinent information while at the site.
- i. The potential for dry-well corrosion should be considered for all containments of Mark I design.
- j. Volumetric inspection of small-bore piping socket welds needs to be addressed on a plant specific basis.

Applicant observations provided by NEI

- a. Using the first two days of the audit to review the binders with the plant basis documents and other material were considered a good practice, as it led to well-focused questions from the audit staff.
 - b. A good practice is for the audit team to announce plans for the breakout sessions as early as possible, to help ensure the applicant has the right staff available to support the sessions. This is especially important for scheduling breakout sessions with plant personnel. Also helpful to the applicant is for the team to announce its plans for the next day at the end of each audit day, listing the topics and applicant engineering support needed.
 - c. An improvement in the process would be better control of the question and answer process during the week of the audit. A different numbering system for the AMP and aging management review questions might be considered. It may also help to have a defined process that the originator follows (e.g., administrative support enters questions into the computer, sends the questions to the audit team lead, etc.). A database would help the closure process, in that the applicant could sort questions by AMP, reviewer, closed or not closed, etc.
 - d. The breakout sessions and one-on-one discussions were helpful in resolving issues.
 - e. A positive practice by the NRC staff is to provide the applicant with the audit team questions, when possible, before the audit team arrives.
 - f. A better understanding of the documentation needed to support the future time-limited aging analyses audits would be beneficial.
3. Follow-up on items from December 20, 2005, telephone conference call
- a. Existing audit process
 - (1) NRC to provide a list of plants with good audit preparation and onsite documentation

The Oyster Creek and Nine Mile Point applicants demonstrated good audit preparation and onsite documentation in support of the audits.

- (2) NEI to develop a standard for the content of onsite documentation and provide for NRC staff review.

NEI has established a team to develop the standard and intended to provide a draft by the proposed March 2006 meeting. Comments would then be requested by April 2006 with the standard finalized in May 2006. NEI's schedules for completing this item and Item 3.a(3) were subsequently delayed.

- (3) NEI to develop a 1-2 page guidance document for the acceptance review and provide for NRC staff review.

NEI has established a team to develop the guidance. The schedule is the same as that for Item 3.a(2).

b. Status of incorporating the scoping and screening review into the audit process

The NRC staff indicated in the December 20, 2005, telephone conference call that it was considering the potential benefits of performing scoping and screening reviews for applications using onsite audits, similar to the aging management review audits. The goal would be to obtain further efficiencies in the process and help the staff manage its application review workload. The staff's assessment is a long-term activity and the staff will discuss the results of this assessment in future telephone conferences or meetings as progress is made.

c. Pre-submittal audit team leader site visits

In the December 20, 2005, telephone conference call, the NRC staff indicated that its intent was for the audit team leader to visit the applicant's facility in advance of the application submittal. The staff has determined that this pre-submittal site visit is not required and any needed advance coordination can be done over the telephone.

4. New topics

a. Environmental Guidance

A license renewal application is initially considered a tendered application and is not docketed until completion of an acceptance review. A checklist for performing the acceptance review for the safety portion of the application is contained in Chapter 1 of the license renewal standard review plan, NUREG-1800. The NRC staff is currently documenting the criteria used for performing the environmental acceptance review and plans to incorporate the checklist into the next revision of Supplement 1 to the environmental standard review plan, NUREG-1555. The staff will provide the checklist to NEI for information in the future.

The NRC has been reviewing NEI's "Severe Accident Mitigation Alternatives (SAMA) Analysis Guidance Document," NEI 05-01. The staff is preparing its final comments and will provide them to NEI to revise the document. The staff is also assessing the best means to endorse the NEI document for use in preparing license renewal applications.

b. License renewal program audit

The NRC's Office of the Inspector General is conducting a six-month audit of the license renewal program and may contact external stakeholders.

5. Public participation

No member of the public chose to participate.

/RA/

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Project No. 690

Enclosures: As stated

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b. License renewal program audit

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Enclosures: As stated

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LIST OF PARTICIPANTS FOR THE
TELEPHONE CONFERENCE CALL BETWEEN THE
U.S. NUCLEAR REGULATORY COMMISSION STAFF
AND THE NUCLEAR ENERGY INSTITUTE

JANUARY 31, 2006

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LIST OF PARTICIPANTS FOR THE
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U.S. NUCLEAR REGULATORY COMMISSION STAFF
AND THE NUCLEAR ENERGY INSTITUTE (CONT.D)

JANUARY 31, 2006

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TOPICS OF DISCUSSION – TELECONFERENCE MEETING
BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION STAFF
AND THE NUCLEAR ENERGY INSTITUTE

JANUARY 31, 2006

1. New issues under development within the NRC that may affect license renewal
 - a. Review of later ASME Code editions and addenda as applicable to license renewal
 - b. Interim Staff Guidance web page update
2. Lessons learned from recent safety review audits
3. Follow-up on items from December 20, 2005, telephone conference
 - a. Existing audit process
 - (1) NRC to provide list of plants with good audit preparation and onsite documentation
 - (2) NEI to develop a standard for the content of onsite documentation and provide for NRC staff review
 - (3) NEI to develop a 1-2 page guidance document for the acceptance review and provide for NRC staff review
 - b. Status of incorporating the scoping and screening review into the audit process
 - c. Pre-submittal audit team leader site visits
4. New topics
5. Public participation

Enclosure 2

NUCLEAR ENERGY INSTITUTE

Project No. 690

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Note to Organization Nuclear Energy Institute (NEI) from Stephen T. Hoffman, dated: April, 14, 2006

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