

October 11, 2006

Mr. Alexander Marion
Nuclear Energy Institute
1776 I Street, N.W., Suite 400
Washington, DC 20006-3708

SUBJECT: RESPONSE TO THE NUCLEAR ENERGY INSTITUTE REGARDING
IMPLEMENTATION OF THE REQUIREMENTS OF 10 CFR 54.37(b)

Dear Mr. Marion:

The Nuclear Energy Institute (NEI) has previously informed the Nuclear Regulatory Commission (NRC) staff of industry concerns regarding the staff's implementation of the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) Section 54.37(b) and the applicability of the backfit rule, 10 CFR 50.109. NEI's most recent position was presented in a March 8, 2006, letter to the NRC that was subsequently discussed with the staff in an April 26, 2006, public meeting. The staff has evaluated the latest information provided by NEI in its March 8, 2006 letter, NEI's previous letters on the subject, and the information provided by NEI in the April 26, 2006 meeting. As discussed in this letter, the staff reaffirms its position regarding implementation of the requirements of §54.37(b). Systems, structures, and components (SSCs) newly identified after a renewed license is issued must be incorporated in the next update of the final safety analysis report (FSAR) and that a backfit analysis in accordance with §50.109 is not required.

This letter also responds to NEI's July 5, 2006, letter to the NRC providing NEI's position on the interpretation of the term "newly identified" as used in §54.37(b). The NRC staff agrees in part but not in the entirety with NEI's position as discussed below.

Implementation of 10 CFR 54.37(b)

The NRC staff agrees that the provisions of §50.109 apply to license renewal. However, under the specific circumstances where SSCs that should have been subject to an aging management review as part of the license renewal application are identified after the renewed license is issued, the requirements of §54.37(b) are applicable. Thus, in accordance with the requirements of §54.37(b), the FSAR update must include these newly identified SSCs and describe how the effects of aging will be managed such that the intended function(s) in §54.4(b) will be effectively maintained during the period of extended operation.

The plain text of §54.37(b) provides that after the renewed license is issued, the FSAR update must include SSCs subject to an aging management review. Thus, §54.37(b) clearly indicates that it is applicable after the renewed license is issued. Further, the regulation states that SSCs "that would have been subject to an aging management review," must be included in the FSAR update. The term "would have been" indicates that the Commission expected that SSCs identified after the renewed license was issued would be evaluated as if they had been part of the initial review.

The history of §54.37(b) supports this view. Section 54.37(b) was first promulgated in the final 1991 license renewal rule (56 Fed. Reg. at 64943). It was not part of the proposed rule. The Commission modified proposed §54.37 which initially only required that the licensee retain all information required to document compliance with Part 54 (55 Fed. Reg. at 29043, 29062 – Proposed Rule). In the final 1991 rule, the Commission responded to several concerns that the special programs initiated because of age-related degradation would become “fixed in time” with no further modification or improvement (56 Fed. Reg. at 64958). The Commission responded that “[t]his was never the Commission’s intent.” Accordingly, the Commission added three new paragraphs to Part 54 to address this concern. The Commission revised §54.37 to add a new paragraph (b) to require, among other things, that the list of SSCs important to license renewal (required to be included in the integrated plant assessment (IPA) in the 1991 rule, per §54.21(a)), be updated at least annually (56 Fed. Reg. at 64958). Thus, the Commission recognized that the SSCs important to license renewal may change over time, even after the license was renewed, and that these changes needed to be documented in the FSAR.

NEI notes that the original §54.37(b) provided that the newly-identified SSCs were to be based on generic information, research, or other new information after the renewed license is issued. NEI is correct, however, as discussed below, when the Commission made revisions to §54.37(b) in 1995, that specific language was dropped. The revised rule simply refers to newly identified SSCs that would have been subject to an aging management review. The Commission did not limit how or by whom these newly-identified SSCs could be identified. (See 56 Fed. Reg. at 64979).

In 1994, the Commission proposed changes to the license renewal rule (59 Fed. Reg. at 46574). Among other things, the Commission proposed to revise the rule to change the definition of SSCs “important to license renewal,” to define those SSCs within the scope of license renewal (59 Fed. Reg. at 46576-46577). The intent of the definition of SSCs important to license renewal remained the same (59 Fed. Reg. at 46577). The Commission also revised the requirements for the IPA. Specifically, the Commission proposed to eliminate the requirement to list all SSCs important to license renewal and instead only required a list of those SSCs within the scope of license renewal that a licensee determines to be subject to an aging management review (59 Fed. Reg. at 46585-46586). The IPA was also to contain a description of the methodology used to determine those SSCs within the scope of license renewal and those SSCs subject to an aging management review (59 Fed. Reg. at 46586-46587). Consistent with this approach, the Commission modified the requirement that the IPA be included in the FSAR supplement that accompanies the application (59 Fed. Reg. at 46587).

The Commission also proposed conforming changes to §54.37(b) (59 Fed. Reg. at 46588). Section 54.37(b) would only require that the FSAR update include a description of how the aging effects will be managed for those newly identified SSCs (59 Fed. Reg. at 46588). The Commission further explained this requirement in the final rule. The Commission stated that revisions to §54.37(b) were made to conform to the deletion of the requirement to list the SSCs important to license renewal in the FSAR supplement that accompanies the license renewal application (60 Fed. Reg. at 22461, 22483 (1995 Final Rule)). NEI states that in revising §54.37(b), the Commission stated that the purpose of the amendment was to limit the information required by the FSAR update. NEI’s statement is correct. The Commission, however, explicitly stated that for newly identified SSCs subject to an aging management review, the FSAR update must describe how the affects of aging will be managed for those newly identified SSCs (60 Fed. Reg. at 22483-22484).

The Commission stressed the importance of having the aging management programs for newly identified SSCs in the FSAR. The Commission received comments on the revised requirement to include a description of how the effects of aging will be managed for newly identified SSCs in the FSAR update. The commenters noted that such a description was at odds with the revised requirement in §54.21(d) that required only that a summary description was necessary in the supplement. However, the Commission explained that for those SSCs that were subject to an aging management review as part of the license renewal process, the application itself and the FSAR supplement together provide the requisite regulatory control to ensure the efficacy of the aging program. The Commission stated further that “it is important to note that the systems, structures, and components discussed in §54.37(b) are those *newly identified* SSCs that would have been subject to an aging management review in the license renewal process” (60 Fed. Reg. at 22484). Newly identified SSCs, however, were not subjected to the same review. Thus, inclusion of aging management reviews in the FSAR update is appropriate.

Thus, it is the NRC staff’s position that the intent of §54.37(b) is to capture those SSCs that, if they had been identified at the time of the license renewal application, would have been subject to an aging management review. Nothing in the statement of considerations for the rule suggests that this analysis would only apply if the licensee identified an SSC that should have been part of an aging management review.

Further, in discussing whether the backfit rule should apply to the review of a license renewal application, the Commission has stated that any additional requirements necessary to manage the effects of aging may be imposed without consideration of costs as part of the license renewal process. This is analogous to the compliance exception of §50.109(a)(4)(i) (60 Fed. Reg. at 22490-22491). Thus, since newly identified SSCs would have been subject to an aging management review if they had been identified at the time of the license renewal application, requiring a licensee to consider them after a renewed license is issued is not a backfit.

Finally, the NRC staff’s position with respect to §54.37(b) is consistent with the principles of license renewal. The two principles of license renewal are (1) the regulatory process is adequate to ensure that the current licensing basis (CLB) provides and maintains an acceptable level of safety for operation with the possible exception of the effects of aging on the functionality of certain SSCs and possibly a few other issues related to safety during the period of extended operation, and (2) each plant’s CLB must be maintained during renewal term in the same manner and to the same extent.

Renewal licensees are obligated to comply with §54.37(b) as a condition of license renewal. If SSCs are identified after a renewed license has been issued that would have been subject to review under §54.4 and §54.21 (through the applicant’s scoping and screening methodology) the inclusion of these SSCs in the FSAR update is consistent with the CLB and is not expanding it. An Interim Staff Guidance (ISG) does not reflect a change in policy, rather it incorporates lessons-learned. The NRC staff would still need to justify its conclusion that certain SSCs should be considered within the scope of license renewal.

Newly Identified SSCs

NEI provided its position on when §54.37(b) should be implemented in a July 5, 2006, letter to the NRC. Specifically, NEI states that §54.37(b) must be implemented to include “newly identified” SSCs in the FSAR update required by 10 CFR 50.71(e) when all of the following conditions occur: 1) there is a change to the CLB; 2) the change to the CLB impacts SSCs that were not in scope for license renewal when the license renewal application was approved; and 3) the SSCs would have been in the scope of license renewal based on the changed CLB, if §54.4(a) were applied to the SSCs. NEI also asserted that SSCs that are plant additions or modifications installed after the renewed license is issued are not subject to the provision of §54.37(b).

The NRC staff agrees that under the circumstances described by NEI, it would be appropriate to incorporate those newly identified SSCs in the §50.71(e) FSAR update. However, newly identified SSCs are not limited only to CLB changes. The staff’s position is that §54.37(b) also applies where SSCs were installed in the plant at the time of license renewal that would have been subject to an aging management review but were missed by both the applicant and the staff during the license renewal process. One source for identifying these SSCs has been the ISG process. Whether identified by the staff or a licensee, newly identified SSCs should be included in the FSAR update. The staff agrees that §54.37(b) does not apply to SSCs installed after the renewed license is issued.

In summary, the NRC staff reaffirms that its position on implementing the requirements of §54.37(b) is correct and that the backfit rule does not apply to the requirement in §54.37(b) to include newly identified SSCs in the FSAR update required by §50.17(e). The staff agrees with NEI’s position that the term “newly identified” applies to SSCs installed in the plant at the time the renewed license was issued but not that the newly identified SSCs are limited only to those resulting from CLB changes.

NEI requested in its July 5, 2006, letter that the NRC staff document the position on “newly identified” in a Regulatory Issue Summary (RIS). The NRC staff intends to issue a RIS that will include not only the position on interpretation of the term “newly identified” but also to inform holders of renewed licenses of the newly identified SSCs that have been identified and need to be included in the next FSAR update in accordance with §54.37(b). Currently, the only known newly identified SSCs were identified in ISGs. The staff will also consider whether any changes are needed to the license renewal regulatory guide and standard review plan during their next update. The staff recommends that NEI consider whether this guidance should be incorporated into its “Industry Guidelines for Implementing the Requirements of 10 CFR Part 54 – The License Renewal Rule,” NEI 95-10, which is endorsed by the NRC’s license renewal regulatory guide.

A. Marion

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The staff will also evaluate whether changes to Inspection Procedure 71003, "Post-Approval Site Inspection for License Renewal," are needed based on the positions contained in this letter.

An identical letter was sent to Mr. David Lochbaum at the Union of Concerned Scientists.

Sincerely,

/RA PTKuo for/

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Office of Nuclear Reactor Regulation

Project No. 690

cc: See next page

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Union of Concerned Scientists
1707 H St., NW, Suite 600
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D. Lochbaum

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An identical letter was sent to Mr. Alex Marion at the Nuclear Energy Institute.

Sincerely,

/RA PTKuo for/

Frank P. Gillespie, Director
Division of License Renewal
Office of Nuclear Reactor Regulation

Project No. 690

cc: See next page

A. Marion

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NUCLEAR ENERGY INSTITUTE

Project No. 690

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