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February 20, 2008

Mr. Bruce Boger
Associate Director for Operating Reactor Oversight and Licensing
U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike, M/S 0-13D13
Rockville, MD 20852

Subject: Proposed Interim Staff Guidance on the Use of ASME Section XI
Code Editions/Addenda, Relief Requests and Code Cases for
License Renewal in Accordance with 10 CFR 54 and NUREG-1801

Dear Mr. Boger:

ASME on behalf of the nuclear power industry is proposing interim staff guidance (ISG) on the use of ASME Section XI Code Editions/Addenda, Relief Requests and Code Cases for license renewal in accordance with 10 CFR 54 and NUREG-1801 (Enclosure 1). Source documents that were used to support the clarifications within the proposed ISG have also been included as Enclosures 2 and 3. Please consider the proposed ISG for NRC publication.

If you have any questions, please contact me on (412) 374-4633

Very Truly Yours,

Kenneth R. Balkey, PE
Vice President
Nuclear Codes and Standards
American Society of Mechanical Engineers

A047
ADD:
Bruce Boger

SUBJECT: PROPOSED INTERIM STAFF GUIDANCE ON THE USE OF ASME SECTION XI CODE EDITIONS/ADDENDA, RELIEF REQUESTS AND CODE CASES FOR LICENSE RENEWAL IN ACCORDANCE WITH 10 CFR 54 AND NUREG-1801

Discussion

NUREG-1801, "Generic Aging Lessons Learned (GALL) Report", Revision 1, references the use of ASME Section XI 2001 Edition with the 2002 and 2003 Addenda in several GALL Programs. The use of relief requests are discussed in NUREG-1801, Volume 2, Chapter I, entitled "Application of the ASME Code". The application of Code Cases are addressed in 10 CFR 50.55a(b)(5) but not in the GALL Report. The following are clarifications as to how these documents should be interpreted for plant specific situations in terms of 10 CFR 54 and NUREG-1801 for plant license renewal.

ASME Section XI Code Editions/Addenda

Several NUREG-1801 Chapter XI programs reference the use of Section XI 2001 Edition with the 2002 and 2003 Addenda. However, earlier editions and addenda are considered an acceptable alternative for these programs as documented in Item 6 of the NRC Meeting Summary dated June 2, 2006 for the NRC meeting with the Nuclear Energy Institute License Renewal Task Force held on April 19, 2006.

Clarification: The use of NRC approved earlier editions and addenda are an acceptable alternative without an exception to NUREG-1801.

ASME Section XI Relief Requests

NUREG-1801, Volume 2, Chapter I, entitled "Application of the ASME Code" states "The applicability time limits associated with the approved alternatives (relief requests) do not extend beyond the current license term. If an applicant seeks relief from specific requirements of 10 CFR 50.55a and Section XI of the ASME Code for the period of extended operation, the applicant will need to re-apply for relief through the 10 CFR 50.55a relief request process once the operating license for the facility has been renewed."

Clarification: If a licensee's current Section XI inspection interval extends beyond the end of their current license, relief requests that have been approved by the NRC in accordance with 10 CFR 50.55a for the duration of the interval can continue to be used to the end of the interval without having to re-apply for relief and without an exception to NUREG-1801.

ASME Section XI Code Cases

Clarification: If a licensee's current Section XI inspection interval extends beyond the end of their current license, code cases that have been approved by the NRC in accordance with 10 CFR 50.55a(b)(5) for the duration of the interval and incorporated in Regulatory Guide 1.147 can continue to be used to the end of the interval without an exception to NUREG-1801.

June 2, 2006

ORGANIZATION: Nuclear Energy Institute

SUBJECT: SUMMARY OF THE LICENSE RENEWAL TELEPHONE CONFERENCE
CALL AND MEETING HELD BETWEEN THE U.S. NUCLEAR
REGULATORY COMMISSION STAFF AND THE NUCLEAR ENERGY
INSTITUTE 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 April 19, 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. Status of Severe Accident Mitigation Alternatives (SAMA) and environmental acceptance review for License Renewal Interim Staff Guidance (LR-ISG);

A proposed LR-ISG endorsing NEI's "Severe Accident Mitigation Alternatives (SAMA) Analysis Guidance Document," NEI 05-01, Rev. A (Accession No. ML060530192), has been prepared and will be issued for public comment in the near future. A second proposed LR-ISG containing the NRC staff's checklist for performing the acceptance review for the environmental portion of the application will also be issued.

2. Update on guidance development for license renewal application (LRA) acceptance review and content of onsite documentation;

NEI indicated that the industry is preparing a letter to the NRC containing its recommendations regarding acceptance reviews for LRA. Regarding development of guidance on the content of onsite documentation, the industry now plans to document and circulate amongst applicants, lessons learned and best practices for onsite documentation. This approach will allow the industry to update the information as additional experience is gained without the delay in submitting it to the NRC staff for review. The NRC staff agreed with this approach and requested that the industry identify if the audit teams' expectations are not consistent between applications.

3. New issues under development – Mark I containment drywell shell LR-ISG;

The need for an LR-ISG concerning corrosion of inaccessible areas of boiling water reactor, Mark I, drywell steel containment shells was previously discussed in past telephone conferences and a meeting on January 31, 2006. The LR-ISG clarifies the information that an applicant should provide in its application. The NRC staff informed NEI that it was preparing to issue the proposed LR-ISG for public comment the week of April 24, 2006, to provide the information to current applicants with Mark I drywell shells. The LR-ISG was subsequently issued for public comment on May 3, 2006, (Accession No. ML061120001).

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4. Status of industry submittal of information on Aging Management Program (AMP) XI.E6 for electrical cables;

NEI will submit a paper to the staff discussing its position on this AMP to support its position that this AMP is not needed.

5. Availability of monthly NRC staff and contractor costs for LRA reviews;

Because of changes in the law, licensees must now track costs on a monthly basis rather than quarterly. NEI asked if the NRC staff could provide staff and contractor costs for review of license renewal applications on a monthly basis. Although the staff can unofficially report staff hours on a monthly basis, monthly contractor costs are not always available to the staff. Contractor costs attributed to each application have, in some cases, been collected and billed after the quarter in which the work was performed. The NRC staff acknowledged the industry's need and indicated that this request actually applies to any large staff review, such as an extended power uprate, and affects the manner in which the NRC bills licensees. NEI should discuss this request at the next NEI - NRC Senior Management meeting.

6. Documenting NUREG-1801 consistency with American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI;

NEI indicated that the ten elements of an acceptable AMP described in the license renewal standard review plan (SRP) and Generic Aging Lessons Learned (GALL) Report are not consistent with the ASME code. The NRC staff responded that the ASME code does not address all of the elements needed for an acceptable AMP which is the reason the ten elements were developed in the SRP and GALL Report. The staff has performed a comparison of the editions and addenda of the code endorsed by the NRC in 10 CFR 50.55(a) through the 2003 addenda. An applicant may use any one as acceptable alternatives to the edition and addenda referenced in the GALL Report AMPs without the need to submit these alternatives for NRC review in its plant-specific LRA. The staff will review its process for ensuring that the latest acceptable version of the code is referenced in the GALL Report and how that interacts with the 10 CFR 50.55(a) endorsement update process.

7. Environmental reviews;

Based on announced schedules, the NRC staff expects concurrent submittals of license renewal and combined operating license (COL) applications for the Harris and Vogtle sites. These overlapping reviews affect the staff's environmental review and preparation of environmental impact statements. In order to complete the renewal review on schedule, the applicant should keep the actions separate and not address the COL in the renewal application.

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The combined impact of license renewal for the existing plant and the new plant should be addressed in the COL application. The Southern Nuclear Operating Company representative participating in the call plans to arrange a meeting to discuss this topic with the staff for its June 2007, Vogtle LRA and late 2007/early 2008 COL application.

8. Public participation;

No members of the public participated in the meeting.

/RA/

Stephen T. Hoffman, Senior Project Manager
License Renewal Branch B
Division of License Renewal
Office of Nuclear Reactor Regulation

Project No. 690

Enclosures:

1. List of Participants
2. Meeting Agenda

cc w/encs: See next page

Davis, Dennis D.

From: Dennis D Davis [dddavis1@ix.netcom.com]
Sent: Thursday, November 09, 2006 6:16 AM
To: Davis, Dennis D.
Subject: FW: Section XI PLEX Presentation

-----Original Message-----

From: James Davis [mailto:JAD@nrc.gov]
Sent: Wednesday, November 08, 2006 9:53 AM
To: Dennis D Davis
Subject: Re: Section XI PLEX Presentation

Dennis,

I posed this question to the NRC Office of General Council and they said that is correct.

Jim

>>> "Dennis D Davis" <dddavis1@ix.netcom.com> 11/08/2006 10:25 AM >>>
Jim,

I want to thank you for your presentation at the Section XI Special Working Group on Plant Life Extension in Louisville. It was very informative and helpful. I do have one question regarding your discussion about the NRC's intent to provide guidance on the use of code cases and relief requests during the license renewal process.

You seemed to indicate that the NRC is considering the approval of the following plant situation: If a plant's current Section XI inspection interval extends beyond the end of their current license, code cases and relief requests that have been approved for the interval may continue to be used to the end of the interval.

Is this being considered?

Thank you,

Dennis