

March 3, 2009

ORGANIZATION: Nuclear Energy Institute

SUBJECT: SUMMARY OF THE LICENSE RENEWAL MEETING BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION STAFF AND THE NUCLEAR ENERGY INSTITUTE

The U.S. Nuclear Regulatory Commission staff (NRC or the staff) and representatives of the Nuclear Energy Institute (NEI) met on January 28, 2009, to discuss generic license renewal topics and license renewal process improvements. Enclosure 1 lists the meeting participants and Enclosure 2 provides the meeting agenda. A summary of the discussion follows.

1. Status of License Renewal Interim Staff Guidance (LR-ISG)

- a. Staff Guidance Regarding the Station Blackout Rule (10 CFR 50.63) Associated with License Renewal Applications (LR-ISG-2008-01)

The staff indicated that it is still holding discussions internally on this LR-ISG and acknowledged that NEI had provided useful comments on the draft. The staff stated that the schedule for resolving this issues generically has not been established and, as such, it is expected to continue to appear during plant-specific license renewal application reviews. NEI commented that the staff should clarify the technical basis for establishing the scoping boundary and to define the "transmission system voltage." NEI expressed concern that the staff has not resolved the issue. NEI commented that backfitting regulations should apply if the scoping boundary is outside the plant's current licensing basis.

- b. Changes to NUREG-1801, Revision 1, "Generic Aging Lessons Learned (GALL) Report" Aging Management Program XI.E6, "Electrical Cable Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements" (LR-ISG-2007-02)

The staff indicated that this LR-ISG is in the final approval stage and final guidance may be issued as early as February 2009. The staff mentioned that it recently delayed approval so that it could add a backfitting discussion to the LR-ISG, which is in response to a recommendation from NRC Office of the Inspector General (OIG) audit on the effectiveness of the license renewal program (OIG-07-A-15).

- c. Updates to the License Renewal Interim Staff Guidance Process (LR-ISG-2007-01)

The staff stated that it is currently finalizing a proposed LR-ISG process revision and plans to request in the *Federal Register* public comments on the proposal. The proposed revision will include administrative updates and extend the process for revising certain guidance documents associated with the staff's environmental review of license renewal applications. The staff is also augmenting the process in response to a recommendation from the NRC's OIG audit. The staff will

propose to include in each LR-ISG a new backfitting discussion section to document the staff's determinations as to whether an LR-ISG involves "newly identified" SSCs, and if it does not, then whether the LR-ISG constitutes backfitting. The staff will also propose to eliminate the "clarification" and "compliance" LR-ISG designations, and instead rely on the new backfitting discussion for specifying licensee implementation of LR-ISGs.

2. Status of the GALL Report Update

The staff stated that it is finalizing the schedule to complete the update and has procured contract support. NEI indicated that it is finalizing comments for the staff's consideration and plans to submit them in several packages as follows: aging management program comments within the next few weeks, followed by electrical and structural comments by the end of February 2009, and all comments by the end of April 2009. NEI asked whether the NRC is considering placing the GALL Report on the NRC's public Web site to make updating it easier.

3. Status of the Generic Environmental Impact Statement (GEIS) Rulemaking

The staff indicated that it plans to issue the draft GEIS in summer 2009 and the final GEIS in the middle of 2011. The staff suggested that it will use a standard 75-day period for submitting public comments on the draft GEIS. Also, the revised GEIS will be more user-friendly with a resource-based approach, rather than the current systems approach. NEI requested the staff to specify an implementation date for the revised GEIS so that applicants can have advance notice to better prepare their license renewal applications. The staff indicated that the content requirements would not change radically and implementation of the revised GEIS could be handled similarly to the implementation of GALL Report, Revision 1.

4. Streamlining the License Renewal Process for Life Beyond 60 Years

NEI indicated interest in future discussions for streamlining the license renewal process and determining the staff's review focus on these applications. NEI stated that, after the first license renewal, subsequent renewals will be less complex because the aging management programs will already be in-place. Also, as with the first decision to apply for license renewal, licensees will likely make early decisions to apply for subsequent license renewals so as to better plan for their plants' futures. NEI reminded the staff that some licensees are eligible to re-apply for license renewal as early as 2009, but most-likely the NRC could expect to see these types of renewal applications as early as 2013.

The staff indicated that it is interested to obtain more operating experience to better ascertain the effectiveness of license renewal aging management programs. The staff commented that subsequent license renewals will most likely be focused technically, rather than on procedure. To facilitate its planning and budgeting, the staff stated that it soon plans to issue another regulatory issue summary to request written notification of when licensees intend to submit license renewal applications. The staff requested that any licensee planning to submit a license renewal application for life beyond 60 years also provide such notification to the NRC.

In addition, a representative from the NRC's Office of Nuclear Regulatory Research stated that there are currently five technical focus areas being considered for plant operation beyond 60 years: (1) electrical cables, (2) concrete materials, especially in high-temperature and high-radiation environments, (3) reactor vessel and internals components, (4) buried and submerged structures, and (5) coatings. The staff stated that it is working to identify any new technical issues as soon as possible while working with the industry's technical organization, the Electric Power Research Institute. Regarding coatings, NEI commented that inspection programs are usually taken credit for preventing aging, not the coatings themselves. NEI also stated that aging concrete could potentially be a significant limiter on plant life because replacing concrete is difficult.

5. New Topics

a. Acceptance Reviews

The NRC stated that licensees need to submit complete license renewal applications. Providing the required information later is not acceptable and does not constitute a complete application acceptable for docketing.

b. Application Review Schedules

The NEI commented that sometimes license renewal review milestones posted on the NRC's public Web site are not accurate and complete. NEI stated that the cut-off date for submitting responses to requests for additional information (RAIs) is an important milestone for applicant planning. Also, NEI stated that sometimes there is confusion as to this final cut-off date. The staff responded that it attempts to present the Advisory Committee on Reactor Safeguards with a safety evaluation report with no open items. To achieve this goal some leeway in determining the final RAI cut-off date is preferable. NEI agreed with the staff that sometimes it is beneficial to not set a hard date.

The staff stated that some review schedules have been delayed for various reasons, but the NRC is aware that lengthening the review process can cost applicants more money (e.g., to maintain contractor support). The staff stated that it is working to finalize review schedules around 24 months for the latest five license renewal applications.

c. Audit Process

The NEI commented that changes to the license renewal audits have resulted in more RAIs. NEI suggested that a future workshop could be helpful to gauge the effectiveness and efficiency of these changes. The staff stated that it does not want to lose the efficiencies of the audit process and it is tracking the number of RAIs issued for each license renewal review. NEI commented that applicants want to know how to plan for these audits, and also whether applications should be changed to reduce RAIs. NEI agreed with the staff that the audit process is

helpful for eliminating unnecessary RAIs, and the staff stated that it is open to any suggestions to improve the audits.

d. Inspections Under NRC Inspection Procedure 71003

The NEI commented that, after completion of the first post-renewal inspections under NRC Inspection Procedure 71003, it may be beneficial to look at the process to determine whether any lessons can be learned. The staff said that it will consider this recommendation for the future.

e. Use of NRC Regulatory Guide 1.207 for License Renewal

The NEI raised a question as to whether NRC Regulatory Guide 1.207 for evaluating fatigue analyses for new reactors also is acceptable for license renewal of existing operating plants.

f. Web Compatible CDs

The NEI provided comments on improving instructions for submitting electronic copies of license renewal applications for posting to the NRC's public Web site.

6. Public Participation

No member of the public chose to provide comments or ask questions at the meeting.

IRAI

Matthew Homiack, General Engineer
Program Operations Branch
Division of License Renewal
Office of Nuclear Reactor Regulation

Enclosures:
As stated

cc w/encls: See next page

want to know how to plan for these audits, and also whether applications should be changed to reduce RAIs. NEI agreed with the staff that the audit process is helpful for eliminating unnecessary RAIs, and the staff stated that it is open to any suggestions to improve the audits.

d. Inspections Under NRC Inspection Procedure 71003

The NEI commented that, after completion of the first post-renewal inspections under NRC Inspection Procedure 71003, it may be beneficial to look at the process to determine whether any lessons can be learned. The staff said that it will consider this recommendation for the future.

e. Use of NRC Regulatory Guide 1.207 for License Renewal

The NEI raised a question as to whether NRC Regulatory Guide 1.207 for evaluating fatigue analyses for new reactors also is acceptable for license renewal of existing operating plants.

f. Web Compatible CDs

The NEI provided comments on improving instructions for submitting electronic copies of license renewal applications for posting to the NRC's public Web site.

6. Public Participation

No member of the public chose to provide comments or ask questions at the meeting.

IRAI

Matthew Homiack, General Engineer
Program Operations Branch
Division of License Renewal
Office of Nuclear Reactor Regulation

Enclosures:
As stated

cc w/encls: See next page

DISTRIBUTION: See next page

ADAMS Accession No.: ML090540092

OFFICE	PM:RPOB:DLR	LA:DLR	BC:RERB:DLR	BC:RPOB:DLR
NAME	MHomiack	SFigueroa	BPham	TTate
DATE	03/3/09	03/3/09	02/26/09	03/3/09

OFFICIAL RECORD COPY

Participant List

License Renewal Meeting between the U.S. Nuclear Regulatory Commission (NRC) Staff and the Nuclear Energy Institute

January 28, 2009

PARTICIPANT

AFFILIATION

Brian Holian	NRC
Bo Pham	NRC
Travis Tate	NRC
C. E. Carpenter	NRC
Matthew Homiack	NRC
Al Fulvio	Exelon
Mike Heath	Progress Energy
Dave Flyte	PPL Susquehanna
Ken Putnam	FPL – Duane Arnold
Ray Kuyler	Morgan Lewis
Arden Aldridge	South Texas / STARS
Anthony F. Ploplis	Progress Energy
Cliff Custer	FENOC
Massoud Tafazzoli	Areva
Abbas Mostala	Energy Northwest Columbia Generating Station
Christopher Mallner	Progress Energy
Bill Victor	NPPD
David Bremer	NPPD
Michael Semmler	Westinghouse
Reza Ahrabli	Entergy
Rick Buckley	Entergy
Alan Cox	Entergy
Eric Blochor	STARS – Worley Parsons
Loyd Wright	SCE – STARS
Gary M. Adkins	TVA
Michael R. Fallin	Constellation
Julie Keys	Nuclear Energy Institute
Deann Raleigh*	SCIENTECH

* Participated by teleconference

ENCLOSURE 1

Agenda

License Renewal Meeting between the U.S. Nuclear Regulatory Commission (NRC) Staff and the Nuclear Energy Institute (NEI)

January 28, 2009

Generic License Renewal – Topics	Lead
1. Status of License Renewal Interim Staff Guidance (LR-ISG)	NRC
a. Staff Guidance Regarding the Station Blackout Rule (10 CFR 50.63) Associated with License Renewal Applications (LR-ISG-2008-01)	
b. Changes to NUREG-1801, Revision 1, “Generic Aging Lessons Learned (GALL) Report” Aging Management Program XI.E6, “Electrical Cable Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements” (LR-ISG-2007-02)	
c. Updates to the License Renewal Interim Staff Guidance Process (LR-ISG-2007-01)	
2. Status of the GALL Report Update	NRC
3. Status of the Generic Environmental Impact Statement (GEIS) Rulemaking	NRC
4. Streamlining the License Renewal Process for Life Beyond 60 Years	NEI
5. New Topics	NRC/NEI
6. Public Participation	All

ENCLOSURE 2

Letter to the Nuclear Energy Institute, from M. Homiack, dated March 3, 2009

SUBJECT: SUMMARY OF THE LICENSE RENEWAL MEETING BETWEEN THE U.S.
NUCLEAR REGULATORY COMMISSION STAFF AND THE NUCLEAR
ENERGY INSTITUTE

DISTRIBUTION:

HARD COPY:

DLR RF

E-MAIL:

PUBLIC

RidsNrrDlr

RidsNrrDlrRpb1 Resouce

RidsNrrDlrRpb2 Resouce

RidsNrrDlrRer1 Resouce

RidsNrrDlrRer2 Resouce

RidsNrrDlrRerb Resouce

RidsNrrDlrRpob Resouce

RidsNrrDci Resouce

RidsNrrDra Resouce

RidsNrrDe Resouce

RidsNrrDeEemb Resouce

RidsNrrDeEeeb Resouce

RidsNrrDss Resouce

RidsOgcMailCenter Resouce

RidsNrrAdes Resouce

RConte, RI

GHopper, RII

AStone, RIII

NO'Keefe, RIV

Nuclear Energy Institute
Project No. 690

cc:

Ms. Christine S. Salembier, Commissioner
State Liaison Officer
Department of Public Service
112 State Street, Drawer 20
Montpelier, VT 05620-2601

Mr. Frederick W. Polaski
Manager License Renewal
Exelon Corporation
200 Exelon Way
Kennett Square, PA 19348

Mr. Clifford I. Custer
Project Manager, License Renewal
FirstEnergy Nuclear Operating Company
P.O. Box 4
Route 168 (Mail Stop SIM-2)
Shippingport, PA 15077

Mr. Paul Gunter, Director
Reactor Watchdog Project
Nuclear Information & Resource Service
6930 Carroll Avenue, Suite 340
Takoma Park, MD 20912

Mr. Hugh Jackson
Public Citizen's Critical Mass Energy &
Environment Program
215 Pennsylvania Avenue, SE
Washington, DC 20003

Mr. Chalmer Myer
40 Inverness Center Parkway
Post Office Box 1295
Birmingham, AL 35201

Ms. Mary Olson
Nuclear Information & Resource Service
Southeast Office
P.O. Box 7586
Asheville, NC 28802

Mr. Garry G. Young
Manager, License Renewal Services
1448 SR 333, N-GSB-45
Russellville, AR 72802

Ms. Lorrie Bell, Project Manager
Wolf Creek Nuclear Operating Corporation
P.O. Box 411
Burlington, KS 66839

Mr. Roger Stewart
Progress Energy Carolinas, Inc.
3581 West Entrance Road
RNP A9
Hartsville, SC 29550

Mr. Michael H. Crowthers, Supervisor
Nuclear Regulatory Affairs
PPL Susquehanna, LLC
Two North Ninth Street (GENPL4)
Allentown, PA 18101-1179

Mr. Michael A. Balduzzi
Sr. Vice President & COO
Regional Operations, NE
Entergy Nuclear Operations
440 Hamilton Avenue
White Plains, NY 10601