

License Renewal Meeting

**License Renewal Working Group
April 29, 2009**

Discussion Topics

- **Submerged Cables**
- **GALL Update**
- **GEIS Rulemaking**
- **“Newly Identified” SSCs – 54.37(b)**
- **Subsequent License Renewal**
- **New Topics**

Submerged Cables NRC Activities

- **Staff position**
 - **Ensure the cables are in an environment for which they are qualified, or**
 - **If not, demonstrate through testing or monitoring that cables can perform their intended design function**

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Industry Activities

- **NEI Medium Voltage Cable Task Force**
 - **Engage NRC**
 - **Evaluation of cable failure data**
 - **Draft regulatory guide**
 - **Cable monitoring expectations**
 - **Support Kerite Cable User's Group**
- **EPRI Cable User's Group**
 - **Training**
 - **Share operating experience**
 - **Cable management guide implementation**

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License Renewal Implications

- **Issue is being worked under Part 50**
- **54.30 applies**
- **Resolution will be carried forward into the period of extended operation**
- **For the review of LRAs, a commitment to the GALL program is adequate**

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GALL / SRP Update

- **Industry comments on GALL**
 - **AMP comments submitted in March**
 - **Electrical comments submitted in about 1 week**
 - **Civil and mechanical comments submitted by mid-May**
- **Assume that updated industry OE will be included in the GALL revision**
- **SRP comments, if any, by mid-June**

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GEIS Rulemaking

- **Industry concerns**
 - **Major reformatting and reorganization of the document will require significant analysis**
 - **Significant re-categorization of topics/issues**
 - **Normal 75 day review period will not be sufficient to review and provide meaningful comments**
 - **Implementation period needs to be addressed**

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"Newly Identified"

- **RIS 2007-16 Rev 0 and NRC letter to NEI dated 10/11/2006 stated that 10CFR54.37(b) does not apply to SSCs installed after the renewed license is issued**
- **Draft RIS 2007-16 Rev 1 states that 54.37(b) applies to SSCs installed after the renewed license was issued if they would have been included in the scope of LR had they been installed prior to the issuance of the renewed license**

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"Newly Identified"

- **Earlier position was based on compliance with Part 50 after the LRA was approved**
 - **Modification process for any new SSC**
 - **Evaluation of component performance**
- **Industry perceives the draft RIS as a change in NRC position**
- **The change will result in licensee effort**
 - **Review of modifications completed since the LRA was approved**
 - **Development of License Renewal AMPs for new SSCs**

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"Newly Identified"

- **Draft rev 1 of the RIS also reverses position on whether errors in the LRA are "newly identified" or backfits**
- **A number of other inter-related changes may be affected by the position on "Newly Identified"**
- **Recommendations**
 - **Revert to RIS 2007-16 Rev 0 definition of "Newly Identified"**
 - **Separate 54.37(b) from the ISG process**
 - **The ISG process should include a backfit review**
 - **If ISG process concludes that the change applies to plants with renewed licenses, then the licensee uses 54.37(b) to update their FSAR**

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"Newly Identified"

- **Request public meeting to review changes to ISG process and RIS 2007-16 prior to issue**

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Subsequent License Renewal

- **Initial applications may be submitted in 2013 or earlier**
- **Technical issues are being studied by NRC / DOE/ Industry groups**
- **Improvements to the LRA preparation and review process should also be studied**
- **Request / recommendation**
 - **Industry review LRA process and recommend changes**
 - **Subject of a future meeting**

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New Topics

- **NRC observations from reviews and audits**
 - **Appropriate level of detail or changes in guidance**
- **AMP operating experience – clarify guidance**
- **Understand perceived changes in NRC review process and scheduling**
- **NRC interest in participation in phone calls between meetings**

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New Topics

- **Use of NUREG 6909 (Environmental Fatigue) for license renewal**
- **Boral generic communication**

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