



UNITED STATES
NUCLEAR REGULATORY COMMISSION
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS
WASHINGTON, D. C. 20555

July 19, 1999

The Honorable Greta Joy Dicus
Chairman
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Dear Chairman Dicus:

SUBJECT: SECY-99-148, "CREDIT FOR EXISTING PROGRAMS FOR LICENSE RENEWAL"

During the 464th meeting of the Advisory Committee on Reactor Safeguards, July 14-16, 1999, we reviewed the staff's proposed options for crediting existing programs for license renewal that are included in SECY-99-148. Our Subcommittee on Plant License Renewal also reviewed this matter on July 1, 1999. During this review, we had the benefit of discussions with representatives of the staff and the Nuclear Energy Institute (NEI), and of the documents referenced.

Background

The license renewal rule requires a demonstration that the effects of aging will be adequately managed for the period of extended operation. The staff and the initial license renewal applicants (Baltimore Gas and Electric Company and Duke Energy Corporation) have found that most of the aging management programs relied upon for license renewal are existing programs. In a letter dated March 3, 1999, NEI provided its view on the level of demonstration required for existing programs under the license renewal rule. In a memorandum dated March 24, 1999, forwarding the NEI letter to the Commission, the staff stated that:

The staff currently views Part 54 such that existing programs are not automatically adequate to manage aging effects for license renewal simply because they are part of the current licensing basis.

In SECY-99-148, the staff has proposed the following three options:

- Option 1: Do not review the adequacy of existing programs.
- Option 2: Amend 10 CFR Part 54 to exclude structures and components subject to existing programs.

Option 3: Focus staff review guidance in the Standard Review Plan on the areas where existing programs should be augmented.

The staff has recommended Option 3 because it provides an effective integrated review of programs being relied upon to manage aging for license renewal. The staff stated that Option 3 would reduce unnecessary burden by focusing the staff's review on augmented programs for license renewal. Option 3 could be implemented within the existing license renewal rule. We understand that Options 1 and 2 would require rule changes.

Recommendation

We endorse Option 3. In order to perform its review of license renewal applications, the staff must have a basis for deciding that existing programs are adequate or that the proposed modifications suffice.

Discussion

The extension of licenses for operating plants is predicated on the effectiveness of aging management programs specific to the various passive, long-lived structures and components in the plant, and on the inspection and test programs, such as those specified in the maintenance rule, specific to active, short-lived structures and components. The initial assessment of the current set of aging management programs, the identification of necessary modifications to existing programs, and the establishment of additional aging management programs are the responsibility of the licensee. Independent assessment of the conclusions of the licensee is the responsibility of the staff. The experience with both pilot applications confirms the importance of these roles. Both applicants prepared excellent documents and the staff was able to perform expeditious reviews and identify necessary improvements to the programs.

Additional documentation is currently being prepared by the various owners groups to guide the treatment of aging issues by future license renewal applicants. The guidance to the applicants in these documents and the review of aging management programs being performed by the staff in the Generic Aging Lessons Learned program create an opportunity to decide which programs may require detailed attention. The staff should still review the aging management programs that pertain to the unique features of individual plants.

Dr. Shack did not participate in the Committee's deliberations regarding this matter.

Sincerely,



Dana A. Powers
Chairman

References

1. Memorandum dated June 3, 1999, from William D. Travers, Executive Director for Operations, NRC, to the Commissioners, SECY-99-148, "Credit for Existing Programs for License Renewal."
2. Memorandum dated March 24, 1999, from William D. Travers, Executive Director for Operations, NRC, to the Commissioners, Subject: Credit for Existing Programs for License Renewal.

