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VICE PRESIDENT  
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NUCLEAR GENERATION DIVISION

April 20, 2012

Mr. Eric J. Leeds  
Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** Industry Plans for Subsequent License Renewal

**Project Number: 689**

Dear Mr. Leeds:

The process codified in 10 CFR Part 51 and 10 CFR Part 54 has proven effective in renewing nuclear power plant operating licenses. As companies do long range planning, there is tremendous benefit in having a stable and predictable regulatory process in place that results in continued operation of the nuclear asset. In that same context, companies are looking beyond the first license renewal period and considering subsequent renewal. The purpose of this letter is to inform the NRC of the industry plans that will facilitate proceeding forward with subsequent license renewals (SLR).

The current license renewal process assures safe plant operation and provides a stable and predictable regulatory platform. The existing regulations will serve us well as we move into the second renewal period and we do not envision the need for any substantive changes to this regulatory process.

However, the industry recognizes that it is prudent that the documents used for the license renewal process should be reviewed and updated, as appropriate, to capture concerns related to aging, new technologies and new research. To this end, the Electric Power Research Institute (EPRI), with support from NEI, has initiated a project to catalog in a single document, technical information related to aging mechanisms. The EPRI report will be organized by Generic Aging Lessons Learned (GALL) Aging Management Review (AMR) chapters and will rely on information from the Issues Tracking Table, DOE research, industry program documents, the revised Material Degradation Matrix, and any additional relevant technical information. This work is currently scheduled to be completed in stages throughout this year and to be published in early 2013. From this EPRI document, NEI will produce a summary document that will conclude, for each GALL AMR Chapter,

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that either a particular aging mechanism is sufficiently captured as is and technical reference(s) will be given to justify that conclusion or to capture newly identified aging mechanisms and an action plan will be developed to ensure whatever is needed to resolve the issue is completed and factored into the appropriate document(s).

In parallel to the EPRI effort, NEI will perform Aging Management Program (AMP) effectiveness reviews using the expertise of the license renewal working groups. This effort will confirm, through the collection of industry data, the effectiveness of AMPs, recommend updates to existing AMPs, and/or identify where new AMPs may be required. This work is scheduled to be completed in September 2012 and published as final in December 2012. We expect to begin sharing the preliminary information from these documents with the NRC staff in September for the purpose of achieving alignment on the conclusions. We expect these conclusions to provide the basis for a future revision to GALL for SLRs.

NEI will continue to develop projects that may be required for SLR and will continue to inform the NRC of any additional projects we develop. We welcome NRC's feedback on the industry plans.

If you have any questions or require additional information, please contact Chris Earls at (202) 739-8078; [cee@nei.org](mailto:cee@nei.org) or me at (202) 739-8093; [djw@nei.org](mailto:djw@nei.org).

Sincerely,



Douglas J. Walters

c: Ms. Melanie A. Galloway, NRR/DLR, NRC