

United States Nuclear Regulatory Commission Official Hearing Exhibit	
In the Matter of:	Entergy Nuclear Operations, Inc. (Indian Point Nuclear Generating Units 2 and 3)
	ASLBP #: 07-858-03-LR-BD01
	Docket #: 05000247 05000286
	Exhibit #: NRC000154-00-BD01
	Admitted: 10/15/2012
	Rejected:
Other:	Identified: 10/15/2012
	Withdrawn:
	Stricken:

NRC000154
Submitted: August 20, 2012

April 11, 2011

MEMORANDUM TO: Trent Wertz, (Acting) Branch Chief
Program Operations Branch
Division of License Renewal
Office of Nuclear Reactor Regulation

FROM: Evelyn Gettys, Project Manager */RA Almas Azeem for/*
Program Operations Branch
Division of License Renewal
Office of Nuclear Reactor Regulation

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

The U.S. Nuclear Regulatory Commission (NRC) staff and representatives of the Nuclear Energy Institute (NEI) met on March 11, 2011, to discuss current license renewal topics. Enclosed is a list of the meeting participants. The NRC staff's presentation slides and agenda are available in the NRC's Agencywide Documents Access and Management System (ADAMS) under Accession No. ML110760586. The NRC's meeting handout is under Accession No. ML110890990 and NEI's meeting handout is under Accession No. ML110730274.

A summary of the meeting discussions follows:

1. Integrated scheduling

The Integrated Scheduling is a disciplined approach to improve the NRC's ability to anticipate and identify when resource needs may exceed resource availability for license renewal reviews. The staff presented the approach that Division of License Renewal (DLR) is taking to insure that the License Renewal Application (LRA) that are received and accepted are given the staff's attention and that both staff resources and scheduling are arranged in a way that will maximum both time and effort.

The staff spoke to the fact that the NRC has not asked the industry to hold back their application submittals, but this has impacted the review process as well as the regional inspections. The staff had five applications submitted in one quarter. The staff stated that by using this integrated scheduling that not every application will have a 22 month schedule, that some will have slightly longer schedules due to multiple plants coming in close together and the affect of the Continuing Resolution on the NRC budget.

2. Incorporation of operating experience

The staff stated its expectation for renewed license holders to continually collect and evaluate industry and plant-specific operating experience, and to use this information to confirm the effectiveness of, or as necessary, enhance their aging

management programs (AMPs). The NEI representatives stated that existing plant processes are adequate for reviewing industry and plant-specific operating experience, and aging management programs are routinely evaluated to determine whether adjustments are necessary to ensure their effectiveness. As the basis for this position, NEI provided a short paper, "Periodic Assessment of AMPs for Industry and Plant Operating Experience" which is available in ADAMS under Accession No. ML110730274. The staff raised a question as to whether there is a gap between operating experience evaluations under existing licensee programs and those evaluations that may be necessary to specifically address aging. For example, the staff highlighted its revised recommendations for managing aging of spent fuel pool neutron-absorbing materials and asked what actions renewed license holders have taken to evaluate the recommendations. It was also highlighted that there are inconsistencies in how license renewal applications describe future commitments to review operating experience after issuance of the renewed operating license. The staff indicated that such reviews are important to ensuring the effectiveness of AMPs and, as such, these types of commitments should be provided in the final safety analysis report supplement. It was agreed that a separate meeting should be held to further discuss this topic, and the NEI representatives requested that the staff provide comments on its paper before this meeting.

3. License renewal commitments

Background - License Renewal (LR) commitments have typically been associated with particular aging management programs, e.g., applicants provide commitments to implement AMPs or to supplement the AMPs described in their LRA. In some instances over time, LR commitments may have drifted away from serving that traditional function to cover either overly broad or overly narrow issues. This has been a source of concern and DLR will be looking to align and structure the management of commitments with the following expectations.

- a. LR commitments to be specifically aligned with the associated or appropriate AMP that they're intended to enhance/supplement.
- b. Evaluate whether regulatory commitments are the appropriate vehicles for certain issues as opposed to license conditions or other regulatory requirements.

Ensure that LR commitments are clear enough so that licensees can properly implement, and the staff can easily verify without unnecessary need for additional clarification. The goal is to ensure the quality of commitments and to ensure that such commitments clearly capture and communicate the context of the underlying issue of concern.

4. Salem's Audit results from the WESTEMS fatigue analysis code

When using a software package to perform fatigue calculations it should be consistent with ASME Code, Section III. The analyst intervention should be justified and documented when using a software package to perform fatigue calculations. The WESTEMS NB-3600 module should not be used until identified issues are resolved. The staff has reasonable assurance that Salem's use of the WESTEMS NB-3200 Design CUF module provides results that are consistent with a traditional ASME Code, Section III NB-3200 analysis. Options are currently being considered on how to generically communicate the concerns and results of the audit.

5. NRC's current position regarding 10 CFR 54.37(a)

The staff wanted to emphasize that 10 CFR 54.37(a) requires the licensee to retain records and documentation that support the renewed operating license. The regional inspectors have been dealing with situations where their audits are impeded because records and documents have not been retained. Industry representatives agreed that formal record retention related to license renewal was required. However, they believed requirements for record retention fell under 10 CFR 50 and that the requirements of 10 CFR 54.37 only applied to records related to the development of the license renewal application. The staff agreed to get additional clarification from the Office of the General Council.

6. NRC's implementation of Temporary Instruction (TI) 2516/001, "Review of License Renewal Activities"

The staff is issuing TI 2516/001 for those plants that meet NRC requirements for "timely renewal" under 10 CFR 2.109, are approaching the period of extended operation, but for which the NRC has yet to make a final decision regarding the renewal of the operating license. The TI will be used in lieu of inspection procedure 71003 to ensure that the staff will have an opportunity to evaluate a facilities readiness for continued operation while avoiding possible stakeholder perceptions that renewal of the operating license is a foregone conclusion.

7. Subsequent license renewal

NRC staff described the status of activities related to review of applications for subsequent renewal, to cover operation beyond 60 years. There have been two workshops on subsequent renewal, in 2008 and February 2011. One conclusion from these workshops is that the NRC's primary role is to ensure plant safety, the Department of Energy's (DOE's) role is to facilitate R&D, and industry has the lead to drive the process and identify resolutions for the various technical issues, as needed, to provide an adequate basis for subsequent renewal. The staff described that the industry should provide the technical basis for subsequent renewal prior to submittal of the first subsequent renewal application. Lastly, the staff proposed that industry identify specific deliverables and schedules to support initial application submittals, along with management level meetings to monitor the status of industry's activities.

8. 2011 Regulatory Information Conference (RIC)

Some general comments were made on the 2011 RIC that took place during March 8-10 at the Bethesda North Marriott Hotel & Conference Center located in Rockville, MD. General agreement was the RIC had been a beneficial experience.

9. Fatigue time-limited aging analysis (TLAA)

NEI described a revised version of a white paper on a proposed approach to assess environmental fatigue for license renewal; the initial version was introduced at the February 3, 2011, TLAA workshop. To facilitate consideration of the paper, the NRC requested that the industry provide a formal submittal of the paper as a generic report for review. The industry stated that it would consider the best approach for submitting the paper, either as a generic report, in an application for a lead plant, or possibly as a proposed Interim Staff Guidance to supplement the license renewal guidance documents.

10. New Topics

The staff mentioned that it would soon issue a draft SER on Topical Report MRP-227, which addresses inspection of pressure water reactors vessel internals.

11. Public Participation

No members of the public attended the meeting.

/RA Almas Azeem for/

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Program Operations Branch
Division of License Renewal
Office of Nuclear Reactor Regulation

Enclosures:
As stated

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Memorandum to Trent Wertz from Evelyn Gettys, dated April 11, 2011

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**Meeting between the U.S. Nuclear Regulatory Commission (NRC) Staff
and the Nuclear Energy Institute (NEI) to Discuss
Current License Renewal Topics**

**PARTICIPANT LIST
March 11, 2011**

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Chris Mallner	Progress Energy
Massoud Tafazzoli	Areva
Tony Harris	STARS
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Ernest Shaw	Southern Nuclear
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Dave Gerber	Structural Integrity Assoc.
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Tom Dong	DTE Energy
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* Participated by teleconference