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September 22, 2014

John W. Stetkar, Chairman
Advisory Committee on Reactor Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-001

SUBJECT: RESPONSE TO ADVISORY COMMITTEE ON REACTOR SAFEGUARDS
REGARDING SECY-14-0016, "ONGOING STAFF ACTIVITIES TO ASSESS
REGULATORY CONSIDERATIONS FOR POWER REACTOR SUBSEQUENT
LICENSE RENEWAL"

Dear Mr. Stetkar,

I am responding to your letter of May 22, 2014 (Agencywide Documents Access and Management Systems (ADAMS) Accession No. ML14142A155), which provided the views of the Advisory Committee on Reactor Safeguards (ACRS) on the U.S. Nuclear Regulatory Commission (NRC) staff's SECY-14-0016, "Ongoing Staff Activities to Assess Regulatory Considerations for Power Reactor Subsequent License Renewal" (ADAMS Accession No. ML14050A306).

The NRC staff appreciates the time and effort that the ACRS has devoted to this important subject, as reflected in the ACRS subcommittee meeting on license renewal held on April 8, 2014, and the ACRS full-committee meeting on May 8, 2014. Your letter to the staff resulting from these meetings included five conclusions and recommendations:

1. Option 1 of SECY-14-0016 is the appropriate option for subsequent license renewal (SLR). It maintains a well understood process for life extension and it preserves regulatory lessons learned.
2. The present actions to update and maintain as current the Generic Aging Lessons Learned (GALL) and Aging Management Programs (AMPs) provide the technical basis for acceptability of Option 1.
3. NUREG-1801, "Generic Aging Lessons Learned (GALL) Report," once updated for current industry experience, evolving research, and lessons learned, is the appropriate supporting guidance for SLR. It will provide the required guidance for updating of the [AMPs].
4. Design basis validation is important for SLR, both to confirm the validity of the design and licensing bases as well as the siting assumptions that may need revision. The design basis of operating plants can be validated using existing regulatory tools. The design basis of operating plants whose siting assumptions need revision should be assessed through the Fukushima related actions.

5. Use of risk assessment techniques is desirable to assess active and passive systems, structures, and components for internal and external vulnerabilities.

In the Staff Requirements Memoranda (SRM) on SECY-14-0016 dated August 29, 2014 (ADAMS Accession No. ML14241A578). The Commission did not approve the NRC staff's recommendation to initiate rulemaking for subsequent license renewal of power reactors. The SRM directed the staff to:

1. Continue to update the license renewal guidance, as needed, to provide additional clarity on the implementation of the license renewal regulatory framework.
2. Address Option 2 and Option 3 as presented in SECY-14-0016 through alternative vehicles (e.g., issuance of generic communications, voluntary industry initiatives, or updates to the GALL Report).
3. Submit an information paper to the Commission by the end of 2015 reporting on the progress of the implementation of the inspection enhancements described in the Reactor Oversight Process Enhancement Project (ADAMS Accession No. ML14017A338) related to aging management and the Inspection Procedure Operating Experience Update Process.
4. Keep the Commission informed on:
 - a. The process of resolving the following technical issues related to SLR: reactor pressure vessel neutron embrittlement at high fluence; irradiation assisted stress corrosion cracking of reactor internals and primary system components; concrete and containment degradation, and electrical cable qualification and condition assessment.
 - b. The staff's readiness for accepting an application and any further need for regulatory process changes, rulemaking, or research.
5. Emphasize in communications with industry the need to strive for satisfactory resolution of these issues prior to the NRC beginning a review of any SLR application.

In following the Commission direction in the SRM, the staff will address the ACRS conclusions and recommendations #1, 2, and 3. With respect to the ACRS conclusion and recommendation #4, the NRC staff will consider this as appropriate as part of the staff's Fukushima related actions. The staff also notes on the ACRS conclusion and recommendation #5, that the 1991 and 1995 statements of consideration for Part 54, and the Commission Policy on the use of probabilistic risk assessment, allows license renewal applicants to use risk insights in aging management activities. The staff generally focuses its review of license renewal applications using risk insights. However, based on the Commission direction to the staff in the August 29, 2014, SRM, the staff does not have any specific plans to broaden the use of risk in its review of SLR applications.

Thank you for your views on these matters and we look forward to our continuing interactions. The staff appreciates the conclusions and recommendations provided by the ACRS and looks

J. Stetkar

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forward to continuing to work with the Committee in the future as the staff develops detailed guidance as directed by the Commission.

Sincerely,

/RA Michael R. Johnson for/

Mark A. Satorius
Executive Director
for Operations

cc: Chairman Macfarlane
Commissioner Svinicki
Commissioner Ostendorff
SECY

J. Stetkar

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Sincerely,

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SECY

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