

# **Official Transcript of Proceedings**

## **NUCLEAR REGULATORY COMMISSION**

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                        Plant License Renewal Subcommittee  
                        DLR Information Briefing

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UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

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ADVISORY COMMITTEE ON REACTOR SAFEGUARDS

(ACRS)

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PLANT LICENSE RENEWAL SUBCOMMITTEE

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DIVISION OF LICENSE RENEWAL INFORMATION BRIEFING

+ + + + +

THURSDAY

MAY 22, 2014

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ROCKVILLE, MARYLAND

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The Subcommittee met at the Nuclear  
Regulatory Commission, Two White Flint North, Room  
T2B1, 11545 Rockville Pike, at 11:00 a.m., Gordon  
Skillman, Chairman, presiding.

COMMITTEE MEMBERS:

GORDON SKILLMAN, Chairman

RONALD BALLINGER, Member

STEPHEN P. SCHULTZ, Member

JOHN W. STETKAR, Member

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ACRS CONSULTANT:

JOHN J. BARTON

DESIGNATED FEDERAL OFFICIAL:

KENT HOWARD

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P-R-O-C-E-E-D-I-N-G-S

(11:02 a.m.)

CHAIRMAN SKILLMAN: Good morning. This meeting will now come to order. I'm Gordon Skillman, Chairman of the Plant License Renewal Subcommittee. This morning the Subcommittee will be briefed with an overview of the current license renewal landscape.

ACRS members in attendance are Steve Schultz, John Stetkar and Ron Ballinger. Our ACRS Consultant, John Barton is also in attendance. Kent Howard of the ACRS Staff is the Designated Federal Official for this meeting.

This morning we will be briefed by John Lubinski, the Division Director for the Division of License Renewal.

The rules for participation in today's meeting had been announced as part of the notice of this meeting, previously published in the Federal Register. We have not received written comments or requests for time to make oral statements from members of the public during today's meeting. The entire meeting will be open to public attendance.

There will be a phone bridge line. To preclude interruption of the meeting the phone will be placed in a listen-in mode during the presentations and

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1 Committee discussion.

2 A transcript of this meeting is being kept  
3 and will be made available, as stated in the Federal  
4 Register notice. Therefore, I request that  
5 participants in this meeting use the microphones  
6 located throughout the meeting room when addressing the  
7 Subcommittee.

8 The participants are requested to please  
9 identify themselves and speak with sufficient clarity  
10 and volume so that they can be readily heard. I also  
11 request that all attendees please silence your  
12 electronic devices.

13 I will now proceed with the meeting and I  
14 call upon John Lubinski to begin the presentation.

15 MR. LUBINSKI: Thank you, Chairman.

16 CHAIRMAN SKILLMAN: John.

17 MR. LUBINSKI: Make sure I silence my phone  
18 before we start. Thank you. Appreciate the  
19 opportunity to be here today. As you said, I'm John  
20 Lubinski, I'm the Director of the Division of License  
21 Renewal. With me today I have Dr. Allen Hiser who is  
22 our Senior Level Advisor who will be helping me answer  
23 any questions you have this morning, as well as other  
24 members of our staff that we have in the room today.

25 The reason for this briefing this morning

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1 is an informational briefing about our License Renewal  
2 Program. And I want to have a discussion of what I'm  
3 going to call the current License Renewal Program.  
4 We've interacted recently with ACRS and the Commission  
5 on subsequent license renewal beyond 60. But I want to  
6 talk about the current program and where we are today.

7 I know all of you are familiar with the  
8 program and what we've done over the years. But we  
9 thought it was good to have this discussion and  
10 informational briefing because it has been since last  
11 February, February of 2013, since we've been before the  
12 Subcommittee meeting or Full Committee meeting to talk  
13 about license renewal.

14 And we think a lot of times that we hear a  
15 lot of discussions about a plant-specific issue during  
16 those interactions but it also gets people refreshed on  
17 what we're doing in license renewal. So we want to talk  
18 about what's happened over the last year or so in those  
19 areas.

20 So the agenda this morning, I'll talk a  
21 little bit about overview of license renewal, our  
22 principles, our framework.

23 Then what we're going to talk about is  
24 guidance and updates that we've had over the last 15  
25 months, maybe a little bit longer than that, to just kind

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1 of refresh everyone where we are. How we handle those.

2 And then we'll talk about the reviews.  
3 What reviews are in-house today. When can you expect  
4 to see them. What are the issues that you can expect  
5 to see coming forward, as a kind of preview of the months  
6 and years to come.

7 And then a little bit of where we are in  
8 waste confidence as well.

9 So as I said in my introduction this morning  
10 is the last time we were front of ACRS to talk about our  
11 current License Renewal Program was a Full Committee  
12 meeting on Limerick, that was February 7th of 2013.

13 Since then we've continued to look at our  
14 programs and processes. We're a continually learning  
15 organization and we want to make sure we make continuous  
16 improvements in our programs. But the key message here  
17 is that we have not changed our overall program itself.  
18 The basic program is the same. We still follow the same  
19 principles.

20 But we've incorporated lessons learned  
21 along the way. Some of those lessons learned we've  
22 incorporated, some are more significant than others.  
23 But, you know, some that, just to share with you, is how  
24 we do audits. As you know as part of our process we do  
25 safety audits. We also do environmental audits.

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1           What we've done is a more integrated  
2           approach to those. Sharing of information across the  
3           two audits. When we do the audits ensuring they're at  
4           the same time so the questions can be asked are in close  
5           proximity.

6           Also the availability of documentation.  
7           We've talked to the applicants about how do we get  
8           documentation sooner so that we can make those audits  
9           more effective and more efficient.

10           CHAIRMAN SKILLMAN: John, how is that  
11           information made available to other licensees that may  
12           be contemplating license renewal?

13           MR. LUBINSKI: Yes, because this is very  
14           specific to the plants what we do is we do share the  
15           information about when the audits occur when we go  
16           through the first, you know, that plant specifically.  
17           So when Plant X is in we will talk about when we're  
18           scheduling the audits. How we've conducted the audits.  
19           Have audit reports issued.

20           And that would be the vehicle in  
21           communicating with other applicants when they come in  
22           to look at those lessons learned. And I think the  
23           industry itself through its working groups that they  
24           have on license renewal share those lessons learned as  
25           well.

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1 CHAIRMAN SKILLMAN: Thank you.

2 MR. LUBINSKI: Operating experience is  
3 something we also look at during our reviews to  
4 determine if there's any changes needed along the way.  
5 We've done an AMP effectiveness audit at the plants.  
6 And we've used, part of the basis for that you've heard  
7 about already, was during subsequent license renewal.

8 But I think what it did is it really  
9 confirmed a lot of what we're doing and what the plants  
10 are doing is working. You know, we're five years into  
11 the current license renewal plan for the oldest plants  
12 now.

13 Collectively we have somewhere about 53 or  
14 56 years of collective operating experience in the  
15 operating period. And I think the AMP audits confirmed  
16 that what we're doing with respect to license renewal  
17 is working and there were not a lot significant issues  
18 there.

19 The bigger area, and I'll talk a little bit  
20 more about later in my presentation --

21 CHAIRMAN SKILLMAN: Let me ask --

22 MR. LUBINSKI: Yes.

23 CHAIRMAN SKILLMAN: When you say that  
24 there are not a lot of significant issues there, is that  
25 because the magnifying glass is too thin? Or is that

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1 because there was so much conservatism built into the  
2 facility to begin with that issues are just not  
3 emerging?

4 MR. LUBINSKI: Well let me start -- When I  
5 say that issues emerging, let me start from a process  
6 perspective. The process of how do we develop the AMPs.  
7 How do licensees implement the AMPs. How do they  
8 incorporate it into their day-to-day processes. How  
9 does our inspection look at those. That's what I meant  
10 from the standpoint of there were no significant issues.

11 From the standpoint of operating  
12 experience more specifically, and getting to your  
13 point, is I think one of the reasons is because of the  
14 established processes. Many of the AMPs that were put  
15 in place were based on existing programs. So there was  
16 a lot of experience in how to deal with those AMPs.

17 Those lessons learned for the new AMPs and  
18 the enhanced AMPs in place provided a great foundation  
19 for how the AMPs were developed, the information that  
20 was needed to be put into those AMPs and how they're  
21 implemented.

22 Specific lessons learned I'll talk about in  
23 a little bit with respect to interim staff guidance that  
24 was issued and how we got that information and how that  
25 goes forward.

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1 MR. BARTON: John, I have a question.  
2 What's the feedback from site inspections that the site  
3 guys are seeing the implementation of the AMPs? Is that  
4 an issue? Because I know there's been at least one  
5 letter issued, I forget which site it was, that there  
6 were, inspectors were finding out that the AMPs programs  
7 were not being implemented. And I forget what the site,  
8 but there is at least one letter out that says that.

9 MR. LUBINSKI: Yes, I'll look to some of my  
10 folks in the audience who may be able to reference that  
11 site. Quite honestly I don't recall that being an issue  
12 at any site. If it was I'd have to ask my folks in the  
13 audience and we can get back to you on that.

14 But what we have noticed, and I'll talk  
15 about our inspection programs, is we do an inspection  
16 prior to the plant getting its licensed approved. And  
17 then another one prior to going into the period of  
18 extended operation to verify that those commitments  
19 were met and those license conditions were done.

20 And again, the important part is we're  
21 doing that prior to going into the extended period so  
22 that if there are issues, as you just said, they can be  
23 adequately addressed.

24 What the audits have shown us, and an audit  
25 of course is different than an inspection, is that these

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1 are normally handled through what I'll say the normal  
2 processes. It's not as if a plant goes into license  
3 renewal and says, here is our program for how we worked  
4 during the first 40 years. And, oh by the way, here's  
5 our additional program now that we're beyond 40.

6 What they've done is they've incorporated  
7 that into their normal programs, whether it's their  
8 corrective action programs or inspection programs, the  
9 feedback mechanisms.

10 The one area that we had that we're still  
11 pulling the string on, if you will, and you've heard  
12 about in subsequent license renewal is being able to  
13 identify when those changes are made to the aging  
14 management program. Was it based on whether or not the  
15 AMP was effective or not, is it a beyond 40 issue? How  
16 is that captured so that that information is not only  
17 shared within that plant but across the fleet and with  
18 us.

19 MR. BARTON: Okay. Thank you.

20 MEMBER STETKAR: John, do you have, you  
21 rattled off some numbers about, you know, the first  
22 plant being five years now into the period of -- But you  
23 had a much larger year base that you have, some 50 some  
24 odd years, which means a fair number of plants are a year  
25 or so or two.

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1 MR. LUBINSKI: Yes.

2 MEMBER STETKAR: You have any insights  
3 about the one-time inspection program? A lot of plants  
4 take fairly extensive credit for one-time inspections  
5 to sort of benchmark the conditions of systems prior to  
6 the period of entering extended operation. So I would  
7 expect that a lot of plants have implemented those  
8 one-time inspections. Have you taken a look at them and  
9 seen, have there been any surprises is what I'm asking  
10 for, because --

11 MR. LUBINSKI: Yes. Surely there's no  
12 surprises. The one-time inspections, the basis for  
13 that is we don't expect to see anything.

14 MEMBER STETKAR: Yes, well that's why I was  
15 asking.

16 MR. LUBINSKI: And just because someone  
17 says we don't expect to see anything we say well okay,  
18 well let's take the look. Is it because you haven't  
19 looked hard enough, going back to Dick's comment  
20 earlier. So instead it was, you know, let's take the  
21 look. Come back and tell me what you see. We have not  
22 seen anything that has alarmed us at all.

23 MEMBER STETKAR: That's good. That's  
24 encouraging.

25 MR. LUBINSKI: Now it also doesn't mean

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1 we're going to stop those programs.

2 MEMBER STETKAR: No, no, no. That's  
3 right. That's right.

4 MR. LUBINSKI: Because we, you know, again  
5 just because one plant doesn't see it that does not  
6 necessarily mean that that one plant is not --

7 MEMBER STETKAR: But I mean you should  
8 have, given the numbers that you've said, you should  
9 have more than one or two sample of those one-time  
10 inspections to see is there any indications of  
11 surprises.

12 MR. LUBINSKI: Right. No surprises on the  
13 one-time inspection and --

14 MEMBER STETKAR: Good.

15 MR. LUBINSKI: -- and we think, based on  
16 that, we're at this point continuing the program. We  
17 think it's something that's important.

18 MEMBER SCHULTZ: And, John, in those cases  
19 with many of the plants that are going into the extended  
20 period they have had a fair number of commitments and  
21 in some cases license conditions applied for the  
22 extended period. And so you're saying that when all of  
23 that is taken into account the record is essentially  
24 clean?

25 MR. LUBINSKI: And when we're saying

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1 essentially clean, I'm going to go back to John's  
2 comment about nothing alarming. Are they finding  
3 stuff? Yes. If they weren't finding stuff then we  
4 would have a concern because we'd be sure that we're not  
5 looking hard enough.

6 But what we're seeing does not question at  
7 all the technical basis for why we were putting the AMPs  
8 in place. And you'll hear a little bit when we talk  
9 about the interim staff guides, some examples of that  
10 as well.

11 MEMBER SCHULTZ: And you have examples.  
12 But what I'm hearing you say is you don't have any trends  
13 that you see --

14 MR. LUBINSKI: No. We --

15 MEMBER SCHULTZ: -- where there's  
16 something that is being missed across the board or in  
17 many cases?

18 MR. LUBINSKI: No. We're not seeing any  
19 trends. You know, when I talk about each of these  
20 examples we can talk a little bit about whether we saw  
21 that from a trend standpoint or just a lesson learned  
22 standpoint.

23 MEMBER SCHULTZ: Okay. Thank you.

24 MR. LUBINSKI: You're all very familiar  
25 with this slide. And just as a general overview, this

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1 is our process, the way it works from a two-path process  
2 from doing an environmental review and as well as a  
3 safety review. And I'm going to focus a little bit  
4 about what goes on in these processes for background.

5 Again, very clear, our environmental  
6 review is done under 10 CFR Part 51. Whereas our safety  
7 review is done under 10 CFR Part 54. As we go through  
8 the process I do want to talk a little about the  
9 environmental side, because under the environmental  
10 side we use some of the same lessons learned if you will,  
11 in establishing processes.

12 We have a generic environmental impact  
13 statement that's issued. Licensees, when they come in  
14 with their environmental report, environmental side,  
15 need to reference that as far as whether they meet the  
16 generic environmental impact statement and if not what  
17 they're doing on a plant-specific basis.

18 The generic environmental impact statement  
19 does not address all issues, because it says some are  
20 plant-specific so the plants will need to do that and  
21 address those issues.

22 As part of the plant-specific issue, one of  
23 the big things that comes up is SAMR Reviews, Severe  
24 Accident Mitigation. And I wanted to just clarify  
25 here, because sometimes there's some misperceptions on

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1       that.

2                   And that's clearly an environmental reason  
3       for doing that, that's part of our NEPA requirement to  
4       do that review, from a policy standpoint. The NRC has  
5       said doing that once meets the requirement whether it's  
6       at initial licensing or during license renewal. So if  
7       a plant has already done it at initial licensing they  
8       wouldn't need to do it during license renewal.

9                   SAMR is very much an informational document  
10       under NEPA. It's being able to do that analysis and  
11       share the information of that results so that we're  
12       making an informed decision on the environmental side.

13                   What appears from a safety standpoint,  
14       comes out of that is, what items can be implemented at  
15       that plant to negate or reduce severe accidents,  
16       mitigate those accidents and is it cost beneficial?  
17       And they do a cost benefit analysis.

18                   Many times you'll hear cost beneficial SAMR  
19       as that's a term we'll use, where they go through the  
20       SAMR analysis and determine it would be cost beneficial  
21       to implement that. With respect to the safety side we  
22       only look at implementing those if they're related to  
23       the aging management program when it comes to license  
24       renewal.

25                   There are some that are identified that are

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1 in the cost benefit analysis that are not related to  
2 aging management. But again from a scoping standpoint  
3 that is not related to a safety issue, they would be only  
4 environmental side.

5 The other issue associated with the  
6 environmental side I mentioned, and the reason I brought  
7 this up is our GEIS, the generic environmental impact  
8 statement. Using the term waste confidence, and that's  
9 what we're currently calling it today, that was called  
10 into question a couple years ago by the courts where we  
11 did not adequately support our waste confidence  
12 finding. The courts asked us to go back and look at  
13 that, that questioned what was in the generic  
14 environmental impact statement for license renewal.

15 So when we updated our GEIS we took that  
16 part out. So when you look at the environmental side  
17 it used to be you had your GEIS and then you had your  
18 plant-specific environmental impact statement. Now we  
19 have a third part, it's how we're resolving the waste  
20 confidence issue. So that environmental review really  
21 has three prongs that need to be met.

22 Our expectation is when we complete the  
23 waste confidence decision, if we find it is acceptable  
24 and can be handled on a generic basis, it would go right  
25 back into the GEIS as a complimentary rulemaking at the

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1 same time.

2 MR. BARTON: The schedule for that is what?

3 MR. LUBINSKI: The schedule right now is  
4 still October 3rd of 2014 to complete that activity.

5 MR. BARTON: Still on schedule. Okay.

6 MR. LUBINSKI: So that's what we're  
7 looking at from a timeframe there. So from the  
8 standpoint of timing of applications, that is one where  
9 a waste confidence is holding up one application we have  
10 in-house today for a decision, and I'll use that as the  
11 example, and we'll talk more about it today, is  
12 Limerick.

13 The last meeting we had was a Full Committee  
14 meeting. We've completed our safety review, have a  
15 recommendation letter from the ACRS. And we're still  
16 waiting for the waste confidence. If that decision  
17 comes out I'll talk about how we would address that issue  
18 and circle back with ACRS.

19 But my point on that is that's one that's  
20 one that's clearly being held by the waste confidence  
21 decision being completed.

22 CHAIRMAN SKILLMAN: I appreciate that  
23 tutorial on the relationship of the environmental  
24 review to the overall effort.

25 MR. LUBINSKI: Great.

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1 CHAIRMAN SKILLMAN: Thank you. That was  
2 very constructive. Thanks.

3 MR. LUBINSKI: From a safety review,  
4 you're all familiar with how we perform the safety  
5 reviews. One of the key points I wanted to get here is  
6 that you, you know, again why haven't we been in front  
7 of ACRS for awhile. You know, I've talked about  
8 Limerick and then we go from the resolution and  
9 technical issues.

10 That's one where we've had a few plants come  
11 in recently that have had what I'm going to call some  
12 very detailed technical issues that needed to be  
13 addressed. Again, we're talking aging management so  
14 we're looking at the data supporting that and saying how  
15 do we really have confidence in moving forward.

16 So we have actually information out to the  
17 licensees asking them to provide additional  
18 information. We knew they weren't simple 30-day  
19 requests for information and they were going to get back  
20 quickly. We know some of them are going to take years.  
21 Examples right now of that, and I'll talk more, is South  
22 Texas Project and Seabrook where they're dealing with  
23 some technical issues.

24 But that's a reason that application has  
25 been in-house for awhile, we haven't been in front of

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1 ACRS because of resolving those technical issues.

2 A third item is, you can see the connection  
3 in the middle here with the dotted lines to hearings.  
4 A hearing can apply to an environmental issue or it can  
5 relate to a safety issue. A classic example here where  
6 we're having a delay based on hearings is Indian Point.  
7 Indian Point was in front ACRS a few years ago, we were  
8 looking at moving forward but we have to address the  
9 hearing issues.

10 With respect to license renewal those  
11 hearings have to be fully dispositioned before we can  
12 take action. They have to go through the ASLB. ASLB  
13 has to make a decision. If its appealed to the  
14 Commission after an ASLB decision by policy the  
15 Commission has told us do not take action until the  
16 Commission has made their decision.

17 If a plant were to come close to going into  
18 the renewed period where we already had the ASLB  
19 decision but it was only in front of the Commission, we  
20 could ask the Commission to either rule sooner or allow  
21 us to issue the license.

22 Indian Point, as you know, has not  
23 completed the entire ASLB process for both safety and  
24 environmental issues and they are in timely renewal. But  
25 again, legally we could not take action because they're

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1 in hearing right now.

2 I mentioned, and you've seen this I think  
3 when we talked about subsequent license renewal, but  
4 these are the main two principles that support license  
5 renewal. We believe the regulatory process is  
6 adequate, and I'll talk about that in a minute, with the  
7 exception of the detrimental effects of aging. And  
8 that's the reasons we focus on aging management from a  
9 safety perspective.

10 And this licensing basis must be maintained  
11 at all times. At all times today and including once it  
12 goes into the renewal period, once they hit 40 years  
13 nothing changes to say you don't need to meet your  
14 licensing basis. That same licensing basis must be  
15 maintained.

16 We know you've seen this graphic before.  
17 The graphic, on the left-hand side of the graph, is  
18 something that shows up in our information digest under  
19 how we regulate. And I think it's a good graph to show  
20 the interaction of the way our processes work.

21 We start with our regulations and guidance.  
22 You know, the regulations come out of the acts, we put  
23 our regulations in place and then the guidance must be  
24 based on what's in the regulations.

25 And then specifically we go on around the

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1 circle here to 3 o'clock on that diagram, we do our  
2 licensing. And, you know, and we have decommissioning  
3 certifications done in other areas, but licensing and  
4 license renewal is part of that licensing process.

5 Then we go into the oversight that again  
6 feeds back into verifying that the people are meeting  
7 their licensing requirements as well as the  
8 regulations.

9 And then the operating experience feeds  
10 back and then you have your support for decision in the  
11 middle which talk about all of our activities, whether  
12 it's administrative or technical issues, such as our  
13 research activities, that support each of these  
14 activities.

15 The reason we felt it was important to put  
16 this diagram up is when we talk about aging management.  
17 We focus during license renewal on looking at the aging  
18 management programs and those detrimental effects when  
19 you get past 40 years. And you can see the arrow jumps  
20 into the middle because it affects all five of those  
21 aspects.

22 It looks at our regulations, putting the  
23 requirements in Part 54. Licensing putting a renewed  
24 license, the aging management. Oversight, we have  
25 specific procedures for license renewal as well as

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1 ongoing for aging management programs. And then of  
2 course our operating experience looks at that.

3 What's also important to note here is that  
4 when we talk about aging management is looking at what  
5 the purpose of aging management is. And it's to  
6 prevent, mitigate, condition-monitor and  
7 performance-monitor what's going on with that  
8 component.

9 Does it mean you will not see degradation?  
10 No, of course you're going to see degradation. It's  
11 being able to have an understanding of when that's going  
12 to occur and that you can take action before it becomes  
13 a safety issue.

14 The other important point is we call these  
15 aging management programs when you hit 40 years as part  
16 of license renewal. And if I had to go back 20 years  
17 ago when we put the program together I may have said we  
18 need to come up with a better term than that. Because  
19 aging management has been in place since day one when  
20 the plant started.

21 There were ISI inspections in place under  
22 ASME. There were other aging programs that were in  
23 place. The majority, and when I say majority, more than  
24 50 percent of the programs that people rely on the past  
25 40 years for aging management are the same programs they

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1 use during the first 40 years. We determined those  
2 programs were effective in moving forward.

3 And in the five years that they've been in  
4 license renewal we have not seen that to be an invalid  
5 assumption, that is still the case that those programs  
6 are valid.

7 CHAIRMAN SKILLMAN: John, let me ask a  
8 question. I remember in the last 80s before the  
9 maintenance role, industry was just howling. They  
10 wanted nothing to do with the NRC getting involved in  
11 their maintenance programs. And out came 50.65.

12 And as a somewhat experienced nuc, I would  
13 say that that's one of the best pieces of regulations  
14 that was ever produced because it has changed the lens  
15 through which the operators and the owners see component  
16 and system health and plant health.

17 To what extent has the maintenance role  
18 driven a quality aging management environment?

19 MR. LUBINSKI: I think when you look at,  
20 again, the maintenance rule and you look at the  
21 underpinnings and the framework of it, we looked at it  
22 and said that's a good framework for looking at aging  
23 management of the passive components.

24 So it's hard sometimes to separate the two.  
25 Because we believe when the plants are putting this in

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1 place today, their aging management programs the  
2 long-live passive components for license renewal,  
3 they're using that same philosophy, the same programs,  
4 the same activities, the same people to do this.

5 So I think it has not only, as you said,  
6 shown a plant health for their active components or the  
7 passive components that they've looked at during the  
8 first 40 years, but has shown the same thing for the  
9 long-lived passive component once they've gotten past  
10 40 years. That it allows them to provide a overall  
11 collective assessment to be able to say the programs are  
12 working and, your term, plant health, that we're in good  
13 shape moving forward.

14 CHAIRMAN SKILLMAN: Yes, I should have  
15 used material condition. But I mean the same thing.  
16 It just seems that the consequence of the maintenance  
17 role has driven a number of initiatives that have really  
18 driven the plants to a better material condition and to  
19 a safer overall, if you will, reactor coolant system  
20 boundary status. That's better.

21 MR. LUBINSKI: Right. And I think the  
22 plants themselves would say that in doing that they're  
23 seeing the side benefits from not only material health,  
24 as you said, or material conditions, but it's also just  
25 overall from an operation standpoint. You know, when

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1 we talk about conditions of the equipment it also  
2 impacts operations and that's where they're looking at  
3 getting an additional benefit as well.

4 CHAIRMAN SKILLMAN: Okay. Thank you,  
5 John. Thanks.

6 MR. LUBINSKI: So I mentioned that some of  
7 our lessons learned have resulted in guides updates.  
8 Here's a few that have been updated -- Or a fewer higher  
9 level documents and updating them.

10 First is a Reg Guide, and this is a  
11 formatting issue. This is a Reg Guide that tells  
12 applicants how the format should be of their license  
13 renewal application when it comes in. Again, it's  
14 guidance. It's not a requirement. But it's able to  
15 let people know hey, -- This is in answer to your  
16 question earlier, Dick, how do you share it with other  
17 folks. This is what we've seen. Look, you know, when  
18 it comes in this way it's easy for us to follow and the  
19 process is more efficient.

20 The SRP, again, that's now guidance for the  
21 staff. The purpose of that is how do we tell our staff  
22 reviewers what to look for in that application. And it  
23 very much aligns with what's in the Reg Guide from a  
24 format standpoint. It ensures a quality application.

25 Are licensees required to meet the SRP?

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1 No, it's a guidance document. If they're not following  
2 what's in the SRP it just generates more questions.  
3 We'll need more information, more questions to  
4 understand how they're meeting the regulation.

5 Then the last point, we always talk about  
6 GALL. And I think it's important to not use that  
7 acronym at times, because it is, it's a generic aging  
8 lessons learned. So again it's a guidance document, it  
9 is what is one way that you can age manage this component  
10 that we've found effective. And it's putting that out  
11 to the industry to say that.

12 I always think of it as it's the NRC topical  
13 report. We get topical reports from the industry on  
14 saying, if we do it this way will you approve it? And  
15 people can just reference the topical report.

16 Well this is NRC being able to say we've  
17 looked at the lessons learned, we've looked at how  
18 plants have done this and said if you do it this way and  
19 then commit to that it makes your review much easier.  
20 Does it mean you can do something else? Of course it  
21 does.

22 CHAIRMAN SKILLMAN: Yes but then you get an  
23 RAI.

24 MR. LUBINSKI: At least. At least an RAI.  
25 Because, again, it's going to cause questions, how does

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1 it meet.

2 So it's important to note that also people  
3 sometimes think that our generic aging lessons learned  
4 is the entire guidance document, it's the Holy Grail of  
5 license renewal. It's just the aspect of aging  
6 management programs and lessons learned on those  
7 programs.

8 MEMBER STETKAR: John, in a couple of  
9 slides you're going to get to a list a ISGs.

10 MR. LUBINSKI: Yes.

11 MEMBER SCHULTZ: But over on this one,  
12 what's your radar for updating the SRP and the next  
13 update to the GALL, they're now, you know, three and a  
14 half years old anyway?

15 MR. LUBINSKI: Right. Our current focus,  
16 and of course this will be subject to change. But  
17 here's where we are today in answering your question is,  
18 our focus right now on the SRP and the generic aging  
19 lessons learned document would be to do an update on that  
20 for subsequent license renewal. So that, you know, the  
21 next version whether it's going to be an update of that  
22 SRP being revision three or a new document, that's our  
23 focus on the SRP.

24 With respect to the generic aging lessons  
25 learned, what we expect is to have a revision three come

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1 out, again focused just on subsequent license renewal.  
2 For the idea that what programs do you need to get from  
3 60 years to 80 years with the idea being that for those  
4 who are just looking to get to 60 years, they can  
5 continue to rely on Revision 2 and the ISGs that are  
6 currently out there.

7 So updating it and what factors go into it,  
8 because I'm getting a puzzling look, is really we're  
9 looking at it from an efficiency and effectiveness  
10 program.

11 MEMBER STETKAR: So let me see if I  
12 understand this.

13 MR. LUBINSKI: Sure.

14 MEMBER STETKAR: So you're looking at  
15 specifically a son of GALL for subsequent license  
16 renewal? Not GALL Rev 3 that would account for, you  
17 know, let's say, I hate the word holistic but I'll use  
18 it, a holistic process that would address issues all the  
19 way out through 80 years.

20 MR. LUBINSKI: It's called Rev 3.

21 MEMBER STETKAR: It would be called Rev 3?

22 So it would incorporate --

23 MR. LUBINSKI: It would take you out to 80  
24 years.

25 MEMBER STETKAR: Okay.

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1 MR. LUBINSKI: However, I want to make sure  
2 the clear communication here is, for those plants that  
3 are coming in now and will come in in future years, for  
4 their first license renewal, the 40 to 60 years, they  
5 would have the option to say I'm already meeting GALL  
6 Rev 3, that could get me out to 80, even though we're  
7 not approving it out to 80, but we'll put all those  
8 programs in place. Or they can stick with GALL Rev 2  
9 saying I'm only looking at 40 to 60. I'm GALL Rev 2 and  
10 the ISGs.

11 MEMBER STETKAR: That I understand.

12 MR. LUBINSKI: Okay.

13 MEMBER STETKAR: I just wanted to make sure  
14 that there wasn't going to be some separate documents  
15 --

16 MR. LUBINSKI: No, not all. It'll be a Rev  
17 3.

18 MEMBER STETKAR: -- like over here that if  
19 you only looked at the slot from 60 to 80. Thanks.

20 MR. LUBINSKI: Good.

21 MEMBER SCHULTZ: John, maybe you were  
22 looking at my confused look. When I looked at the GALL  
23 report one of the things that I thought I saw that it's  
24 a lessons learned document, of course, that's the title  
25 of it. But it also indicated that it was a living

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1 document of a type.

2 MR. LUBINSKI: Yes.

3 MEMBER SCHULTZ: And so programmatically  
4 what is capturing the continuous information gathering  
5 associated with periods of extended operation moving  
6 forward with the fleet?

7 MR. LUBINSKI: What's capturing there is  
8 that when we look at, again, purpose, when you call it  
9 a living document. We look at it as a living document  
10 from the standpoint of being guidance on what is one  
11 acceptable program.

12 How do we capture the living part of that,  
13 and that would be our interim staff guidance where we  
14 would issue interim staff guidance that's actually a  
15 supplement to the GALL. So rather than every time we  
16 have one issue we want to hit, issue in the entire GALL,  
17 we can just say here are the ISGs.

18 So if you look at an applicant coming in  
19 today and say I want to meet GALL Rev 2, they would meet  
20 what's in GALL Rev 2 and the entire list of ISGs that  
21 are out there.

22 MEMBER SCHULTZ: Okay. Thank you.

23 MR. LUBINSKI: Which is a good setup for  
24 the next slide where we start to talk about ISGs.

25 So most recently we've issued eight interim

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1 staff guidance documents, which are called ISGs. And  
2 all of them, they can be related to an SRP, other  
3 documents. They could be related to our environmental  
4 side as well. But all of them have been on the GALL  
5 document. So they're really interim staff guidance as  
6 a revision to GALL Rev 2.

7 Again, it provides timely guidance to the  
8 applicants. Rather than having to go through a full  
9 GALL revision we would just issue this interim guidance.  
10 But what we don't shortcut here is the public  
11 involvement. When we issue an ISG we issue it out for  
12 public comment. The industry gets a chance to provide  
13 insights as well. It promotes openness and  
14 transparency in that process.

15 Once we put it into GALL, if we were to  
16 update GALL and put it into that, it gets another round  
17 of those public comments as well and that would be based  
18 on a lot of implementation of that ISG as well.

19 I'm going to talk in the next slide about  
20 some of the more current ISGs that were issued.

21 So here are the eight listed, and I'm just  
22 going to talk very briefly at a high level. Of course,  
23 if you want to engage on any of them we can.

24 You know the first one has to do with  
25 borated water and what we learned over time, and as you

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1 can see it's actually a revision to a previous ISG. And  
2 the idea is this is one that was implemented, got some  
3 feedback and implementation of the ISG itself gave a  
4 lessons learned to come back and say here's some changes  
5 that are needed.

6 The second one is, and you'll hear this one  
7 a couple of times, is Aging Management Program for Steam  
8 Generators. This is one that really relies on a  
9 guidance document from the industry. So when the  
10 industry puts out guidance, and this was NEI-9706, it  
11 was their third revision, they made changes to that  
12 document and we worked very closely with them and that  
13 allowed us to update our ISG on the Steam Generator Aging  
14 Management Program.

15 Any time the industry puts out guidance  
16 that we think's appropriate and acceptable, again, it's  
17 lessons learned, we want to incorporate that into our  
18 processes.

19 The next one had to do with buried piping.  
20 This is one where when the buried piping issue arose a  
21 few years ago the industry put together a voluntary  
22 industry initiative on how to address that. We felt it  
23 was important to also look at that in our license renewal  
24 program and issued an ISG on how to handle that.

25 I'd say right now they're working at

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1 parallel paths between what the industry is doing on the  
2 voluntary initiative and what we have in our ISG.

3 What we're hoping to get is based on  
4 industry experience with their voluntary initiative  
5 that the two could come together at some point and we  
6 would issue an ISG that basically just endorsed the  
7 industry programs on where they're going. Again,  
8 that's the overall intent and goal of where we want to  
9 be.

10 The next one was 2011-1104 that talks about  
11 pressure vessel internals inspections. Again, there's  
12 a industry document on that that was issued for the PWRs,  
13 MRP-227. And this again was something we looked  
14 towards and made sure our interim staff guidance clearly  
15 addressed what was being done in that area.

16 The next two, 1105 and 1201, are programs  
17 where we definitely had lessons learned from the  
18 industry. What were they seeing based on their  
19 inspections? What were they doing as far as adequate  
20 inspection programs? What did we see as possibly  
21 changes to some of those? And have coordinated with the  
22 industry.

23 The big issue is here, is when you start to  
24 look at 01 and 02, 1201 and 1202, really based on  
25 industry feedback we made a lot of changes along the way.

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1 And then what we did, also turned around is and then had  
2 our last one on here, Draft 1301, this was actually part  
3 of one of the previous documents when we put this out,  
4 and the industry said you know the scope of this ISG is  
5 just too big.

6 You know, you're trying to address too many  
7 issues in this lessons learned, can we separate this out  
8 into two documents. And the NRC said yes, we think  
9 that's a good idea and it's going to make a much clearer  
10 communication.

11 Now the question is how do we handle these.  
12 If you could stay on that slide a minute, Allen.

13 So if a plant's in-house today or a future  
14 applicant's coming in, as we said a future applicant  
15 they would look at GALL Rev 2, and we'd have them meet  
16 GALL Rev 2 or ask them how they implemented that. And  
17 we'd have them look at all these ISGs.

18 For plants that are in-house today, if a new  
19 ISG is issued, their application may have come in two  
20 years ago, a year ago, five years ago, we're going to  
21 ask them have you looked at these ISGs. What have you  
22 done with respect to them? Normally we don't have to  
23 ask the question.

24 When they send their updates to their  
25 license renewal application they'll have already

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1 implemented this. They'll have looked at it and said  
2 oh by the way we saw your ISG, here's what we've done  
3 to update it and been proactive in that area.

4 But the point is if they're in-house and we  
5 haven't made a decision on their renewed license yet  
6 we're going to look at this and ask them how they're  
7 addressing the ISGs.

8 Now what happens to the plants that we've  
9 already renewed? And that always comes up as a  
10 question. And again, it gets to point is, GALL is a  
11 guidance document. It is not a requirement. Many  
12 people think of it as a requirement and say well how come  
13 you're not requiring people do this.

14 What we require them to do, and there was  
15 a presentation when we were doing the subsequent license  
16 renewal briefing, some of you heard that, where the  
17 industry put up a slide of how their QA program works,  
18 how they implement this feedback mechanism. That's a  
19 legally binding requirement. It was put as, you know,  
20 the QA program is a requirement on the industry.

21 All licensees have said all their aging  
22 management programs are going to be managed under the  
23 scope of their quality assurance program. So when they  
24 look at these ISGs it's incumbent upon them to take that  
25 as operating experience, put that in their corrective

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1 action program and make a determination of whether  
2 changes are needed.

3 Do they have to do it exactly the way it's  
4 stated here? No. It's guidance. They have to make  
5 that evaluation themselves. We follow up through  
6 inspections and can look at that to make a determination  
7 if we felt that was inappropriate. Next slide.

8 The other documents we've issued,  
9 Regulatory Information Summaries. Again, issue  
10 summaries. These are documents we issue for people who  
11 may have had questions about our regulations, where  
12 we're going, what the issues are.

13 We've issued one recently on how are we  
14 looking at license renewal versus new license  
15 amendments as they come in. The scoping issue of  
16 there's a major licensing amendment coming in-house, is  
17 it before the license renewal? Is it after the license  
18 renewal? Is it in the process and how does it get scoped  
19 in? So it provides clarification on that.

20 This AMP effectiveness. I've mentioned  
21 that licensees have all scoped in their aging management  
22 programs under their QA Program. This provides a  
23 discussion to that because there have been questions  
24 about that from our external stakeholders. How are  
25 they required to look at this? So we felt it was

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1 important to put that out.

2 We've issued that as a draft for public  
3 comment and that was at the industry's request, to have  
4 a draft issued, so we accommodated that request.

5 We've also made changes to our --

6 CHAIRMAN SKILLMAN: John, can you speak to  
7 what some of those comments are on that draft?

8 MR. LUBINSKI: Have we received any yet?  
9 I don't know if we've gotten the comments in. The  
10 original comments is, I can go back, is it was a long  
11 time in the making. This RIS, the one that's listed as  
12 2014-XX, because it talked about AMP effective in an  
13 operating experience, there was a confusion of whether  
14 or not we were stating that these were done under their  
15 quality assurance program or whether this was a  
16 requirement of 10 CFR Part 54 to actually implement  
17 changes to, you know, the living document, if you will.

18 And what we said is no, Part 54 is not the  
19 requirement for that. Where the requirement is is  
20 under your QA Program. Once we got past that big issue  
21 a lot of the questions and comments went away.

22 I think now that it's been issued -- I  
23 haven't seen, I was looking towards our point of  
24 contact. I don't think we've gotten our formal  
25 comments in on that one yet. And I'm seeing a nod from

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1 the industry saying yes, we did.

2 But nothing significant. No significant  
3 comments because we got over that first hurdle because  
4 they believed it clearly addressed what they're  
5 currently doing today.

6 MEMBER STETKAR: John, I haven't looked at  
7 1406. In a nutshell and, well mostly interested in NFP  
8 805 and the fire protection stuff.

9 MR. LUBINSKI: Sure. Yes.

10 MEMBER STETKAR: What's the bottom line on  
11 that? So suppose --

12 MR. LUBINSKI: Yes, the --

13 MEMBER STETKAR: Go on.

14 MR. LUBINSKI: The reason you may not have  
15 seen it is it was issued on May 5th of this year.

16 MEMBER STETKAR: Yes, I see that. But,  
17 you know, that's 16 days ago.

18 MR. LUBINSKI: Yes I don't know why, I  
19 haven't been following that. Okay, in a nutshell what  
20 we've said is it really depends on when that license  
21 application comes in in the process. If you're going  
22 to come in early in the license renewal process and  
23 submit and NFP 805 application we're going to tell you  
24 you need to rescope under license renewal. And so --

25 MEMBER STETKAR: The application or the

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1 actual issuance of the --

2 MR. LUBINSKI: Application.

3 MEMBER STETKAR: Application.

4 MR. LUBINSKI: Right. It really has to do  
5 with when the application comes in. So if you're coming  
6 in, and let's just pick some dates. You know if January  
7 someone comes in with their license renewal application  
8 then they come in in April or May and they say here's  
9 our 508 application, what we're saying is we want to  
10 scope that new equipment into the process. Because  
11 now, you know, under your license renewal application  
12 you have some equipment that's not going to be valid  
13 anymore and then you have other equipment that's just  
14 coming in and we want to look at that.

15 MEMBER STETKAR: But how do you handle, I  
16 mean, in some cases the applicant, 805 application for  
17 example, doesn't know until the license amendment is  
18 approved the precise scope of equipment that is in that  
19 licensing basis or not. Because there's some  
20 negotiations over plant modifications or analysis and  
21 things like that.

22 MR. LUBINSKI: Right. That's the second  
23 half is --

24 MEMBER STETKAR: Okay.

25 MR. LUBINSKI: -- If they do that and come

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1 in and have to scope that equipment in, i.e., they come  
2 in early in the process, what we tell them is we're not  
3 going to make our final license renewal decision until  
4 that application has been dispositioned by the NRC. So  
5 we'll run parallel paths but we're not going to make our  
6 final decision until that is --

7 MEMBER STETKAR: You can actually get a  
8 license renewal held up until --

9 MR. LUBINSKI: You're going to hear this  
10 afternoon, we're having a meeting on Callaway. That's  
11 one of the open issues was waiting until they completed  
12 their 805, but they scoped in that equipment.

13 MEMBER STETKAR: Yes.

14 MR. LUBINSKI: Now what was important is  
15 the other end and I think this is where licensees and  
16 applicants have really pushed to say, what if we're  
17 coming in at the tail end of the process. For issues  
18 beyond our control the license renewal has been delayed  
19 but we want to get, and I'll use your example, an 805  
20 application coming in.

21 And we look at it and say yes, we've already  
22 completed the reviews. We've already had  
23 conversations with ACRS. We're, you know, we're at the  
24 finish line, does it make sense to reopen the scoping  
25 at that point.

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1                   And we said no it doesn't make sense at that  
2 point. We can handle that under a requirement of 5437  
3 where they need to go back and now look at once that  
4 application's approved, handling it totally separate.  
5 What they need to do.

6                   MEMBER STETKAR: Okay.

7                   MR. LUBINSKI: Now let me give you the  
8 environmental side here, since you have an interest in  
9 the 805, I don't want you to be confused on this is.

10                  If a licensee were to come in at the  
11 tail-end and provide their NFP 805 review it requires  
12 a PRA to be done, that may impact their SAM analysis.  
13 If it impacts the SAM analysis that could be new and  
14 significant information.

15                  And so it's not going to hold up the license  
16 renewal based on the 805 application, but it may require  
17 them to re-look at their SAMR and us to re-look at their  
18 results and that could hold it up.

19                  MEMBER STETKAR: Okay. Thank you.

20                  MR. LUBINSKI: Sure.

21                  Inspection manual chapters I won't go in a  
22 lot of detail. But 71002 is what I refer to as our  
23 pre-license renewal inspection where we go out and look  
24 at what the requirements are.

25                  003 is our post, once we've issued the

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1 renewed license, prior to them entering the term, we go  
2 out and look at what they're doing as far as implementing  
3 the procedures. We've updated those procedures, the  
4 new dates are on there, 2011 and 2013.

5 This was based really on feedback from our  
6 inspectors. Clarifying, again, lessons learned, what  
7 they've seen over time, where the emphasis needs to be,  
8 what number of hours need to go in. Should we be doing  
9 more prior to entering the term? Should we be doing  
10 things later?

11 So we looked at that as good feedback from  
12 the standpoint of making sure we're getting our biggest  
13 bang for the buck on inspection.

14 And then the last was we did put a special  
15 instruction procedure in place for plants are in timely  
16 renewal. And that was issued in September of last year.  
17 Only applicable to one plant at this point. We hope it  
18 only stays applicable to one plant at this point on  
19 renewed licenses prior to that timeframe, or at least  
20 make decisions. But we found that effective as well.  
21 Next slide.

22 Overall status of where we are today is we  
23 have renewed 73 units. At that end of this calendar  
24 year, we keep sticking to a calendar year because the  
25 number changes so often, that's our new terminology.

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1           The end of the calendar year we'll be at 38  
2           units in a period of extended operation. In those the  
3           one unit that didn't make it into the period of extended  
4           operation, Kewaunee, is in the process of  
5           decommissioning. And we do that VY has announced they  
6           will be going there as well. So that will change the  
7           numbers as you move forward.

8           19 units are currently under review at 11  
9           sites. The most recent was Fermi Unit 2, that just came  
10          in at the end of April.

11          We have six upcoming applications expected  
12          in calendar years '15 through '18.

13          And, as we've said, with subsequent license  
14          renewal we do expect hearing from the industry the first  
15          application to come in in calendar year 2018, at least  
16          one application at that time. And we, I'm not going to  
17          talk more about that because we have briefings with the  
18          Subcommittee and Full Committee meeting as well as  
19          Commission meeting.

20          Okay, this is the slide that probably is  
21          going to have the most interest because it's really a  
22          scheduling slide. But I wanted to kind of give you and  
23          idea why the schedules are what the schedules are. This  
24          is all public information on the site.

25          I'm going to go down the list. Let me just

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1 say that, you know, if I start to look at the first four  
2 on the list, Limerick, Callaway, Byron & Braidwood,  
3 Sequoyah, the first four line items.

4 These are the ones that I'm going to say are  
5 in the more normal process. When you say normal as far  
6 as what you would expect to see where we're meeting  
7 schedules that are more in line with what you see, 22  
8 months, 30 months, depending on whether they have  
9 hearings associated with them or not.

10 We see them following the normal process.  
11 Definitely Callaway, Byron & Braidwood and Sequoyah.  
12 We're going to talk Callaway this afternoon. As you can  
13 see our expectation on this is to have the Full Committee  
14 meeting in October of this year. Hopefully make a  
15 licensing decision by the end of this calendar year.

16 Byron and Braidwood, as you can see, we're  
17 looking at Full Committee meeting in 2015. And  
18 Sequoyah we're setting up some dates because we're just  
19 trying to work with the applicant on some open items and  
20 when we're going to get the information in. So they're  
21 going to follow what we call the normal process.

22 Limerick is going to be a little different.  
23 As you can see we've already had a Full Committee  
24 meeting. We have a letter from ACRS agreeing with our  
25 recommendation in moving forward. But we're going to

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1 have to issue a supplement to that.

2 Why are we issuing a supplement to the SER?  
3 Well it's been, it's going to be 18 months by the time  
4 we issue this. The applicant would have addressed  
5 these ISGs that we had. The applicant may have made  
6 other plant changes that they've identified to us.

7 So what we want to do is make sure, as I  
8 said, ISGs have to be issued before it goes out the door.  
9 The supplement is going to address those issues.

10 Do we see anything that's a concern right  
11 now? And the answer is no. There's no red flags,  
12 there's no significant issues. We at this point would  
13 recommend we don't see a need for another ACRS  
14 Subcommittee meeting or Full Committee meeting.

15 What we plan to do is issue a draft of the  
16 SER in August timeframe to ACRS, attach a memo to that  
17 with our recommendation, probably about a month or two  
18 later that we'll have our final supplement for your  
19 information. We would like to get a response to that.  
20 Hopefully your response will be you agree that the  
21 supplement is sufficient and no additional interactions  
22 are needed. Or if there are interactions we hope to  
23 know that as early as possible. Based on the scoping,  
24 as I said, we don't see any concerns or issue.

25 Why are we looking at that timeframe of

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1       October? It's the waste confidence decision. Waste  
2       confidence will be completed in October and once that  
3       is issued it has what they call a 30-day cooling off  
4       period, so the first time we can issue the licenses will  
5       be in November.

6               Since we will have completed our  
7       environmental review, the waste confidence will be  
8       done. All issues that we found significant or are in  
9       the SER will have been complete, we don't want to hold  
10      the licensee up any more in our decision and we'd like  
11      to issue that out the door by the end of the calendar  
12      year. And, again, based on where we are right now with  
13      our supplement.

14             MEMBER STETKAR: Yes, forgive me, I was  
15      writing a couple of notes.

16             MR. LUBINSKI: Sure.

17             MEMBER STETKAR: What was your rough time  
18      schedule for the supplement SER to us for --

19             MR. LUBINSKI: September timeframe.

20             MEMBER STETKAR: Hmm, that doesn't give --  
21      Okay.

22             MEMBER SCHULTZ: I heard August.

23             MR. LUBINSKI: August for a draft. We'll  
24      provide you a draft in August with a formal letter coming  
25      in September.

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1                   MEMBER STETKAR:     Okay.     Because, you  
2     know, as a Full Committee we don't meet in August.    So  
3     September would be the first time we'd be able to sort  
4     of make a determination as a Full Committee whether or  
5     not we wanted to see it, which could back us up into the  
6     fall.

7                   MR. LUBINSKI:    Right.    We'll make sure,  
8     we'll work with Ed and we've been trying to coordinate  
9     schedules if we need to do anything sooner.

10                  What we're also trying to, you know,  
11     there's a requirement that if we issue the SE and too  
12     much time passes before we make a decision we might have  
13     to issue another supplement, so that's what we're trying  
14     to avoid as well.    So we're coordinating a lot of  
15     different aspects here as well as your schedule being  
16     one of them.    Okay?

17                  MEMBER STETKAR:   Okay.

18                  MR. LUBINSKI:    Grand Gulf.   Okay, this is  
19     where we start getting into a lot of TBDs.   Grand Gulf,  
20     South Texas, Seabrook and Davis Besse, to a certain  
21     extent, are in the areas where we have some significant  
22     issues that the licensees need to address.

23                  Grand Gulf, we identified during the  
24     application that they made some changes to the way  
25     they're looking at the neutron fluence.   And there was

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1 a question about whether license amendments were needed  
2 in that area and they came in with a license amendment.

3 And that's one where we're waiting for the  
4 license amendment to be complete because it affects the  
5 aging management programs. We expect that license  
6 application to come in June of this year. We'll have  
7 to coordinate with our folks who are looking at that from  
8 an operating standpoint on when that's going to be  
9 complete. We don't expect any significant issues out  
10 of that, but that causes a time delay.

11 MEMBER SCHULTZ: So is that a new  
12 methodology?

13 MR. LUBINSKI: It's a new methodology.

14 MEMBER BALLINGER: Is this related to --

15 MEMBER STETKAR: You have to come up to the  
16 microphone.

17 MR. LUBINSKI: We're good, Jim.

18 MEMBER BALLINGER: Is that related to the  
19 PTS rule?

20 MR. LUBINSKI: Jim, maybe you can come up  
21 to the microphone at this point.

22 MR. MEDOFF: I don't believe it's related  
23 to the -- If you're talking about 5061 Alpha, the  
24 alternative --

25 MR. LUBINSKI: Identify yourself, please.

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1 MR. MEDOFF: This is Jim Medoff of the  
2 staff. The fluence methodology for Grand Gulf impacts  
3 their TLAs as well. So it's just not the surveillance  
4 program, it's the TLAs as well.

5 MR. LUBINSKI: Thanks, Jim.

6 South Texas, you know, there's a couple  
7 issues we're dealing with there, the long pole in the  
8 tent if you will, is the selective leaching. There's  
9 somewhere on the order of about 350 components at the  
10 plant where they've experienced this and we're making  
11 that they have a good mechanism for identifying when  
12 they can tell if there is selective leaching and what  
13 effects it's having. And we've asked them to provide  
14 us more data that would support an effective aging  
15 management program on that.

16 MEMBER BALLINGER: Selective leaching of  
17 what? This like metal components?

18 MR. LUBINSKI: Metal components.

19 MEMBER BALLINGER: Heat exchangers and  
20 those kinds of things?

21 MR. LUBINSKI: The components themselves  
22 are usually connectors, valves and --

23 DR. HISER: Yes, some of their secondary  
24 side piping.

25 MEMBER BALLINGER: Brass and bronze and

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1       that kind of stuff?

2                   MR. LUBINSKI: Right.

3                   DR. HISER: Yes.

4                   MR. LUBINSKI: If I could ask Bill Holston  
5       to maybe come up to the microphone. Bill's been our  
6       lead technical review on this issue.

7                   MR. HOLSTON: The components in question  
8       are the essential service water piping components,  
9       elbows, fittings, strainers, one pump casing.  
10      Components of that nature. And then about a dozen  
11      buried piping welds, but only the weld is the zone that's  
12      affected by the selective leaching.

13                  MEMBER BALLINGER: Thanks.

14                  MR. LUBINSKI: Thank you, Bill, appreciate  
15      it.

16                  Seabrook, I know everyone's familiar.  
17      ASR, we're still working that issue. And so again  
18      that's why you're seeing TBDs there. We note that we  
19      did come for an ACRS Subcommittee meeting in July of  
20      2012. You see a TBD next to that because we expect we're  
21      going to come back for a second Subcommittee meeting.

22                  We don't want anyone to have a  
23      misperception, and especially you, that we're going to  
24      be coming back asking not to have Subcommittee meeting  
25      on that. We're going to have a lot more information and

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1 we're going to want to share that with you and get your  
2 insights before moving forward.

3 Davis Besse, again it's the shield building  
4 cracking issues. We believed we put together an SER  
5 that closed the item. We were hoping to come in last  
6 September and then Davis Besse identified some new  
7 information that we felt it was important for them to  
8 look at before coming in so we issued an RAI.

9 Since that time, as you're aware, they as  
10 part of their steam generator replacement, opening up  
11 the shield building again, had some issues with voids,  
12 cracked rebar. We asked the question.

13 We don't know if that is going to impact  
14 their aging management program or not, but we felt it  
15 was important to ask the question. And we're waiting  
16 for a response and I believe July 1st is the timeframe  
17 we're going to get a response from them on whether it  
18 impacts or not.

19 But, again, we'll be coming back for a  
20 second Subcommittee meeting and we'll have that  
21 scheduled some time here in the future.

22 Diablo, essentially it's been on hold for  
23 awhile based on really some seismic issues that they're  
24 dealing with that effect the environmental side, but  
25 there's some safety aspects of that as well. And we did

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1 have a Subcommittee meeting already but TBD next to that  
2 because we plan to come back again and have that meeting.

3 And then finally is Indian Point. Indian  
4 Point, as you can see, we've gone through a Subcommittee  
5 meeting, a Full Committee meeting. Issued the SER,  
6 we've already issued one supplement to the SER based on  
7 additional information. We know we're going to be  
8 issuing at least one more supplement to that.

9 But we believe that by the time we come back  
10 to the Committee it will be a number of years. And,  
11 again, we're going to want to come back to the Committee  
12 and start with a Subcommittee again as well as a Full  
13 Committee meeting.

14 So the TBDs here, as you can see, are areas  
15 where -- And I'm going to say the TBDs in parenthesis,  
16 are the ones where we've already taken some action at  
17 this point but we're probably going to do another  
18 action, whether it's another Committee meeting or  
19 another SER supplement.

20 The one that's the focus right, and we  
21 appreciate your attention on, is the Limerick. That's  
22 the nearest term and then the question will be whether  
23 or not the ACRS felt it was important to re-engage on  
24 that issue.

25 I'll try to wrap up here. A little on the

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1 waste confidence, I talked about this already so I won't  
2 spend too much time. But again it's our generic  
3 determination regarding storing spent fuel beyond the  
4 license life. It had to do with whether there's a  
5 repository, how long it stays on site. You know,  
6 likelihood of spent fuel pool fires as well as leaks.  
7 And that we're hoping it's handled on a generic basis.

8 You know, as I said the Commission ordered  
9 us to stop making decisions based on waste confidence,  
10 but they didn't tell us to stop working on license  
11 actions. They want us to keep going on that with the  
12 idea that once whatever that decision is we can  
13 incorporate that as we move forward.

14 We do hope that as it moves forward that  
15 issue is handled appropriately by our waste confidence  
16 directorate. That corresponding changes are made to  
17 our GEIS at that time so that we can disposition those  
18 at that time.

19 If anything changes in that process then,  
20 you know, whether or not it's the due date that they have  
21 of October 3rd of 2014, or if they come up with a  
22 different decision on October 3rd of 2014, that would  
23 change where we go. And we'll be back talking to you  
24 again about what schedules will be because that will  
25 change the world in license renewal if it comes back

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1 differently.

2 Conclusions. Key messages here. We've  
3 appreciated the interactions we've had with ACRS and the  
4 recommendations we've had from ACRS. We've  
5 appreciated the meetings. I know that even recently  
6 when we talked about subsequent license renewal, you  
7 know, I've appreciated the feedback, it's changed our  
8 thinking on some issues and where we're going. And  
9 appreciated the dialogue.

10 We're trying to maintain continuous  
11 communication on the significant technical issues.  
12 That's one of the reasons for the update today.

13 Again, I think people will keep up with  
14 what's going on with license renewal depending on how  
15 much it's in front of them. So I haven't been in front  
16 of ACRS Subcommittee meeting in 15 months and felt it  
17 was important to get back, we need to talk about that.

18 I meet monthly with Ed Hackett, the  
19 Director of ACRS, to talk with him about what we see as  
20 issues. And mostly it's scheduling now. We're going  
21 to keep those scheduling reviews going. And you have  
22 a schedule right now in front of you.

23 And in doing that we want to make sure we  
24 reach alignment on how we interact with ACRS. Whether  
25 or not it's the need for another interaction based on

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1 things such as the Limerick situation or whether it's  
2 a need for additional Subcommittee meetings as we move  
3 forward on any issues where we've already discussed the  
4 topics.

5 So I appreciated the questions and comments  
6 along the way and certainly here to dialogue on any  
7 additional questions you may have.

8 CHAIRMAN SKILLMAN: John, thank you very  
9 much. Colleagues, do you have any additional questions  
10 for John? Steve?

11 MEMBER SCHULTZ: I appreciate information  
12 flow continuing, John. It's been very helpful to see  
13 this in one place. Thank you.

14 MEMBER STETKAR: Nothing at all, thanks  
15 very much.

16 CHAIRMAN SKILLMAN: Ron.

17 MEMBER BALLINGER: Thank you very much.

18 CHAIRMAN SKILLMAN: John?

19 MR. BARTON: I had nothing else. Good  
20 briefing, thank you.

21 CHAIRMAN SKILLMAN: Thank you very much.  
22 Is the phone bridge line open please.

23 Is there anybody on the bridge line please,  
24 that would like to make a comment? If there is anybody  
25 on the bridge line, please identify yourself.

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1                   MEMBER STETKAR: Just say something so --  
2                   It's sad, but this is the only way we know whether the  
3                   bridge line is actually open. So if there's someone out  
4                   there just say something please.

5                   CHAIRMAN SKILLMAN: Hearing none we'll  
6                   close the bridge line.

7                   To the people in the audience, is there  
8                   anybody that would like to make a statement or a comment,  
9                   please?

10                  Hearing none.

11                  John, thank you very much for an excellent  
12                  presentation. This meeting is adjourned.

13                  (Whereupon, the meeting in the  
14                  above-entitled matter was concluded at 12:01 p.m.)  
15



# License Renewal Program

Information Briefing to the Advisory Committee on Reactor Safeguards

May 22, 2014

Division of License Renewal

U.S. NRC, Office of Nuclear Reactor Regulation

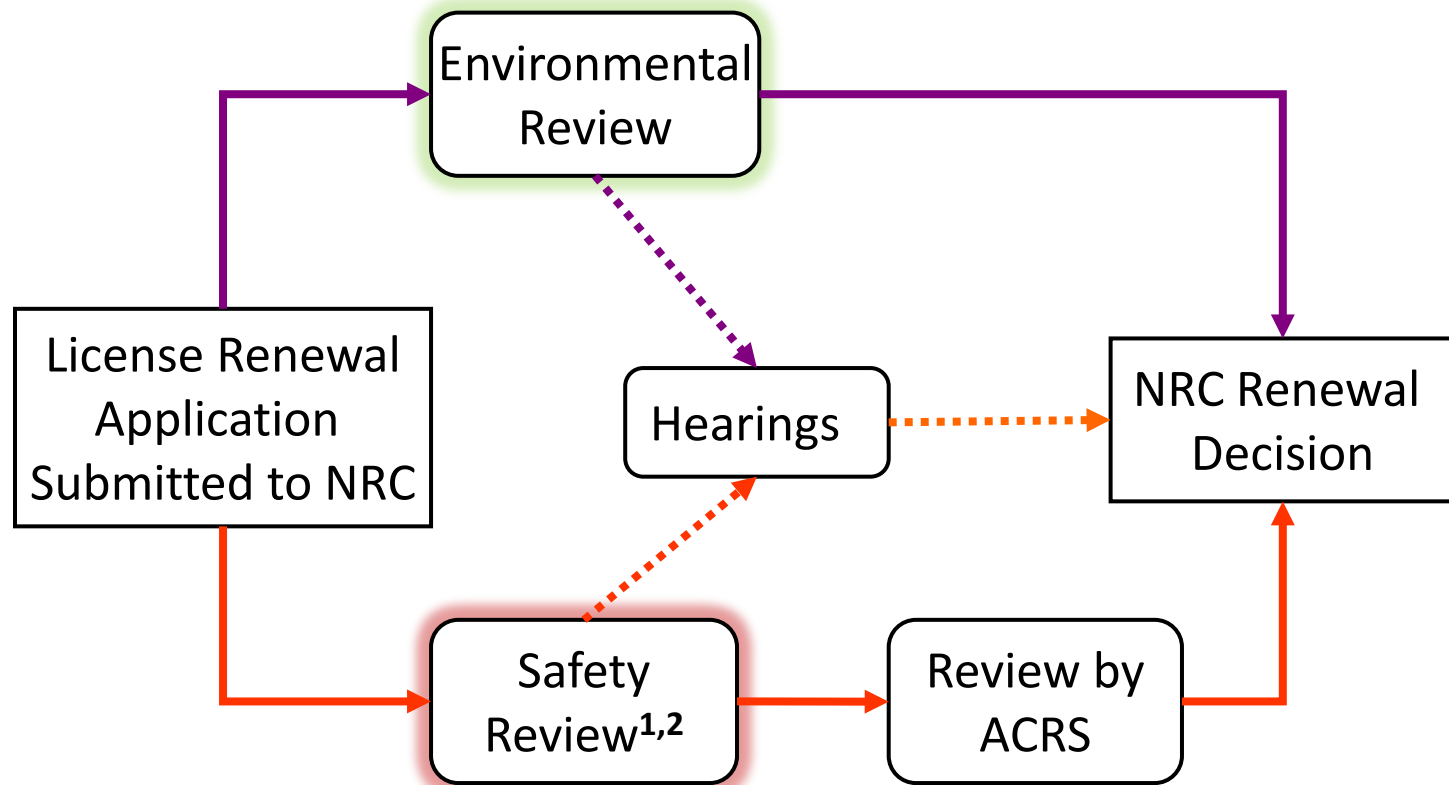
# Agenda

- Introduction
- Overview of current DLR landscape
  - Process Overview, Principles, Framework
  - License Renewal Guidance and Updates
  - License Renewal Review Status and ACRS Schedule
  - Waste Confidence Status

# Introduction

- Limerick ACRS Full Committee on 2/7/2013
- The license renewal (LR) overall process has not changed.
- Lessons learned have improved and enhanced the current LR review process.

# LR Process Overview



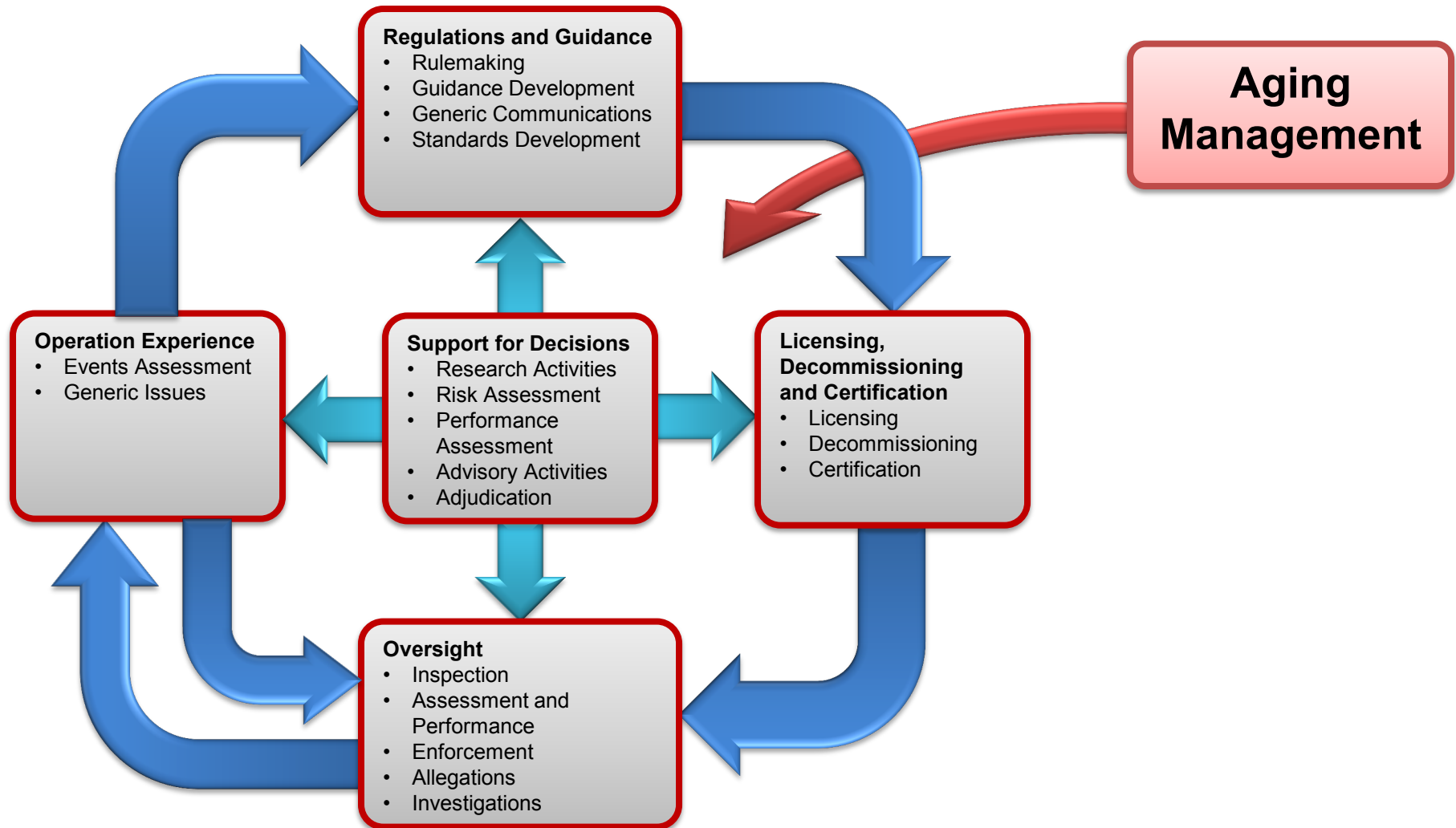
1. In the safety review, the Advisory Committee on Reactor Safeguards (ACRS) conducts an independent review of the application
2. Findings from NRC region-based inspectors are used to inform the safety review

# LR Principles

- *The regulatory process, continued into the extended period of operation, is adequate to ensure that the current licensing basis of all currently operating plants provides an acceptable level of safety, with the possible exception of the detrimental effects of aging on certain systems, structures, and components, and possibly a few other issues related to safety only during the period of extended operation, and*
- *Each plant's current licensing basis is required to be maintained during the renewal term.*



# LR Process Framework



# LR Guidance and Updates

- Regulatory Guide (RG) 1.188, “Standard Format and Content for Applications to Renew Nuclear Power Plant Operating licenses” (9/2005)
  - Guidance to applicants on information to be included in the LRA
- Standard Review Plan (SRP) for Review of License Renewal Applications for NPPs (NUREG 1800), Revision 2 (12/2010)
  - Guidance to NRC staff for performing its safety license renewal reviews
  - To ensure the quality and uniformity of the staff’s reviews
  - To present a well-defined base from which to evaluate applicant’s programs and activities for the PEO
- Generic Aging Lessons Learned (GALL) Report, Revision 2 (12/2010)
  - Guidance which includes an acceptable manner for managing the effects of aging during the period of extended operation (PEO)

# LR Guidance and Updates

- 8 License Renewal Interim Staff Guidance (LR-ISG) since GALL and SRP, 2010 Revisions.
- Provide timely guidance to applicants on new staff's positions.
- Enhance communication with stakeholders and the public.
- Promote openness and transparency of the regulatory process.

# LR Guidance and Updates

## Current list of LR-ISGs

- LR-ISG-2011-01 “Aging Management of Stainless Steel Structures and Components in Treated Borated Water, Revision 1”
- LR-ISG-2011-02 “Aging Management Program for Steam Generators”
- LR-ISG-2011-03 “GALL Report Revision 2 AMP XI.M41, “Buried and Underground Piping and Tanks”
- LR-ISG-2011-04 “Updated Aging Management Criteria for Reactor Vessel Internal Components of Pressurized Water Reactors”
- LR-ISG-2011-05 “Ongoing Review of Operating Experience”
- LR-ISG-2012-01 “Wall Thinning Due to Erosion Mechanisms”
- LR-ISG-2012-02 “Aging Management of Internal Surfaces, Fire Water Systems, Atmospheric Storage Tanks, and Corrosion Under Insulation”
- **(DRAFT)** LR-ISG-2013-01 “Aging Management of Loss of Coating Integrity for Internal Service Level III (Augmented) Coatings”

# LR Guidance and Updates

- Regulatory Issue Summaries
  - RIS 14-06 “License Renewal Guidance Related to Current Operating Issues And Licensing Actions” (Final Issued 5/5/2014)
  - RIS 2014-XX “Maintaining the Effectiveness of License Renewal Aging Management Programs” (**DRAFT**) – received public comments
- Inspection Manual Chapters (IMCs) and Procedures (IPs).
  - IP 71002 “License Renewal Inspection” (11/23/2011)
  - IP 71003 “Post-Approval Site Inspection for License Renewal”(2/25/2013)
  - IP 71013 “Site Inspections at Plants with Timely Renewal Applications” (9/25/13)

# LR Review Status

- 73 units have been relicensed
- 38 units will be in the PEO by the end of 2014
  - 1 unit announced permanently cease power operations
- 19 units currently under review (11 sites)
  - Fermi Unit 2 recent LRA received on April 30, 2014
- 6 upcoming applications expected CY 2015 -2018
- Subsequent License Renewal (SLR) progress on regulatory and technical frameworks
  - ACRS Subcommittee on 4/8/14, Full Committee on 5/8/2014
  - First SLR Application expected in CY 2018

# ACRS Schedule for LR reviews

Plant Site	SER w/OI	ACRS SC	Final SER	Supplement SER	ACRS FC
Limerick	7/2012	9/2012	1/2013	Yes (TBD)	2/2013
Callaway	4/2013	5/2014	9/2014	NA	10/2014
Byron & Braidwood	11/2014	12/2014	4/2015	NA	5/2015
Sequoyah	1/2015	TBD	5/2015	NA	TBD
Grand Gulf	1/2013	TBD	TBD	NA	TBD
South Texas Project	2/2013	TBD	TBD	NA	TBD
Seabrook	6/2012	7/2012 (TBD)	TBD	NA	TBD
Davis Besse	7/2012	9/2012 (TBD)	9/2013	Yes (TBD)	TBD
Diablo Canyon	2/2010	2/2011 (TBD)	6/2011	Yes (TBD)	TBD
Indian Point	1/2009	3/2009 (TBD)	7/2009	(Supp. 1) 8/2011 (TBD)	9/2009 (TBD)

This information is available in the NRC public website

# Waste Confidence

- NRC's generic determination regarding the environmental impacts of storing spent nuclear fuel beyond the licensed life for operation of a nuclear power plant.
- Commission order to stop licensing decisions relying on WC rule. This impacts the LR process.
- DLR environmental resources and staff diverted in support of WC.
- October 3, 2014 is the target date to Publish Final GEIS and Final Waste Confidence Rule.



# Key Messages

- Recommendations from the ACRS are extremely important in the decision process for license renewal
- Maintain continuous communications regarding significant technical issues and updates to the review schedules and guidance
- Reach alignment for managing additional interactions with the ACRS