

November 4, 2015

MEMORANDUM TO: Alexander Adams, Jr., Chief
Research and Test Reactors Licensing Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

FROM: Duane Hardesty, Project Manager */RA/*
Research and Test Reactors Licensing Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF OCTOBER 7, 2015 PUBLIC MEETING TO
DISCUSS THE RULEMAKING FOR STREAMLINING
NON-POWER REACTOR LICENSE RENEWAL (MF3231)

The U.S. Nuclear Regulatory Commission (NRC) held a Category 2 public meeting on October 7, 2015, to discuss the rulemaking for streamlining non-power reactor license renewal. The public meeting was held in Brewster, Massachusetts. The purpose of the meeting was to solicit comments from the public, licensees, and other stakeholders on the preliminary rule changes to proceed with rulemaking. The rulemaking would issue new regulations to eliminate license terms for certain classes and streamline license renewal for the remaining classes of non-power production and utilization facilities. The meeting notice and agenda dated September 24, 2015, are available in the Agencywide Documents and Management System (ADAMS) at Accession No. ML15267A036. A list of the attendees is provided in Enclosure 1. A copy of NRC public meeting presentation is provided in Enclosure 2 (ADAMS Accession No. ML15295A054).

The meeting was attended by 47 individuals primarily representing industry representatives and NRC staff. In addition to the 47 in-person attendees, some individuals participated in the meeting through audio teleconferencing and webinar.

The major areas of discussion are summarized below:

NRC Presentation

The NRC staff provided background and a status update on the rulemaking. The NRC staff explained that the rulemaking would establish non-expiring license terms for facilities with Class 104a and 104c licenses and while maintaining license renewal for facilities with Class 103 licenses.

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All non-power production or utilization facilities would be required to submit to the NRC final safety analysis report (FSAR) updates every five years. In addition, the rulemaking would lengthen the existing timely renewal provision provided in Title 10 of the *Code of Federal Regulations* (10 CFR) 2.109, extend applicability of 10 CFR 50.59 to decommissioning facilities that have removed fuel, revise definitions and terminology, and provide accident dose criteria for non-power production and utilization facilities.

Stakeholder Discussion

During the open discussion part of the meeting, some industry representatives expressed concern about responding to numerous requests for additional information (RAI) every five years related to updated FSAR submissions. NRC staff explained that they do not anticipate RAIs to the extent required during the license renewal process because licensee FSARs have been reconstituted through the license renewal process. In addition, by requiring licensees to submit updated FSARs every five years, NRC expects licensees will be able to maintain the licensing basis over time, which prevent the need for numerous RAIs.

Other discussion topics included questions regarding the depth of NRC's review of FSAR updates, how changes will be identified, and NRC's approval of FSAR updates. NRC staff explained that project managers would generally focus on changes to the FSAR (i.e., a "delta" review). The NRC's proposed guidance will describe one acceptable approach for identifying changes to the FSAR (e.g., change bars in the margin). The NRC staff indicated that FSAR updates will not be approved by the NRC, but the staff will consider other means to communicate receipt of the submission and the conclusion of NRC's review.

Other attendees had questions regarding implementation. NRC staff explained that eligible facilities with Class 104a or 104c licenses would be required to submit the initial updated FSAR within two years of the effective date of the rule. The NRC staff explained that FSAR submissions would be staggered to avoid a backlog from developing again.

Enclosures:

1. List of Attendees
2. NRC Presentation

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ADAMS Accession No.: Pkg: ML15307A110; Meeting Notice ML15267A036;
Meeting Summary ML15307A002; NRC Meeting Presentation ML15295A054

*concurrence via e-mail

OFFICE	NRR/DPR/PRLB/PM*	NRR/DPR/PRLB/LA	NRR/DPR/PRLB/BC	NRR/DPR/PRLB/PM
NAME	DHardesty	NParker	AAdams	DHardesty
DATE	11/04/15	11/4/15	11/4/15	11/04/15

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LIST OF ATTENDEES

NAME	ORGANIZATION
Norbert Carte	NRC
Groileau Emmanuel	IRSN
About Yehia Hassan	IRSN
Sarah Don	MIT-NRL
Tim DeBey	USGS
Cameron Goodwin	RINSC
Jeff Davis	RINSC
Paul Martin	RINSC
Paul Zaffuts	Zaffuts Group
Daniel Thomas	GE Hitachi
Jere Jenkins	TRTR
Melinda Krahendehl	Reed
Christina Barrett	Reed
Tom Regan	UML
P.M. Whaley	University of Texas
Dan Hughes	NIST
Edward Lan	MIT
Clive Townsend	Purdue
Susan Tucker	MIT
Cindy Montgomery	NRC
Jerry Newhouse	TEES NSC
Chris Crouch	TAMU
George Miller	UCI
Steve Miller	AFRRI
John Foster	MIT
Walter Steingass	UCD/MNRC
John Fruits	MURR
Colleen McClaussan	MIT
Eben Allen	NRC
Les Foyto	MURR
Christine Legere	Cape Code Times
Kevin Hsueh	NRC
Liz Gormsen	ICF
Kevin Hemingheysen	Ohio State University
Matt Berelund	UFTR
Dan Cronin	UFTR
Kaitlyn Restis	WSU
Corey Hines	WSU
Ralph Butler	MURR
Michael Flagg	MURR
Mark Trump	RSU
Corey T Reisner	MSTR
Hal Bollman	UCD MNRC
Bruce Meffert	MURR
Sandra Warren	Aerotest
Patrick Boyle	NRC
Klausen Schsrer	NRC
Mirela Gavrilas	NRC