The Honorable Ivan Selin Chairman U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Dear Chairman Selin:

SUBJECT: SECY-93-113, ADDITIONAL IMPLEMENTATION INFORMATION FOR 10 CFR PART 54, "REQUIREMENTS FOR RENEWAL OF OPERATING LICENSES FOR NUCLEAR POWER PLANTS"

During the 398th meeting of the Advisory Committee on Reactor Safeguards, June 10-11, 1993, we discussed with the staff its proposals in SECY-93-113 for clarifying the staff's approach described in SECY-93-049, Implementation of 10 CFR Part 54, "Requirements for Renewal of Operating Licenses for Nuclear Power Plants." We had the benefit of the documents referenced.

More can be done to reduce the necessary scope of review of components subject to age-related degradation by giving full credit to the maintenance programs in place during the initial term of license. Where these maintenance programs have been determined by the NRC to be adequate in preserving safety during the original term of the license, they become part of the current licensing basis and, if continued, may be acceptable for managing age-related degradation during the license renewal period. If necessary, 10 CFR Part 54 should be revised to permit the staff to recognize these programs.

The staff has made substantial progress in clarifying how it will implement 10 CFR Part 54. It will now invite public comment. This should disclose whether the uncertainty that the industry representatives once believed to be present in the rule is now acceptably lowered. We will be interested in reviewing the public comments and the staff's resolution of these comments.

Sincerely,

J. Ernest Wilkins, Jr. Chairman

References:

- SECY-93-113 dated April 30, 1993, for the Commissioners from James M. Taylor, Executive Director for Operations, NRC, Subject: Additional Implementation Information for 10 CFR Part 54, "Requirements for Renewal of Operating Licenses for Nuclear Power Plants"
- 2. SECY-93-049 dated March 1, 1993, for the Commissioners from James M. Taylor, Executive Director for Operations, NRC, Subject: Implementation of 10 CFR Part 54, "Requirements for

Renewal of Operating Licenses for Nuclear Power Plants"