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The Honorable Kenneth M. Carr  
Chairman  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Chairman Carr:

SUBJECT: PROPOSED RULE ON NUCLEAR POWER PLANT LICENSE RENEWAL

During its 360th meeting, April 5-7, 1990, the Advisory Committee on Reactor Safeguards reviewed the staff's proposed rule on nuclear plant license renewal. This matter was also discussed during a meeting of the Regulatory Policies and Practices Subcommittee on March 26, 1990. During these meetings we had the benefit of discussions with representatives of the NRC staff, NUMARC, EPRI, Northern States Power Company, and Yankee Atomic Electric Company. We also had the benefit of the referenced document and its enclosures.

The decisive issues for license renewal and associated plant aging, and the potential for further aging during the proposed license extension, should be addressed throughout the life of a plant. Attention to aging phenomena, and the criteria for safe operation (adequate protection of the health and safety of the public), should be the same just after as just before license renewal. There may be components or systems which are not aging issues during the first forty years, but become so later, and which therefore may require special attention.

At the time that the forty year period for a license was chosen, there was no special technical rationale for its choice, and no specific form of plant aging becomes magically decisive at forty. The regulatory job for license renewal is to identify the aging elements of the plant, and ensure that they receive timely attention during the extended license period.

In that context, we were surprised by the lack of emphasis on pressure vessel integrity during our briefings. This is surely one of the driving technical issues for extended life, and we assume that it will move to a more central position as the plans develop.

The staff proposes to use the "current licensing basis" of a plant as the basis for license renewal, but there seems to be some ambiguity about the interpretation of the term. The industry seems concerned that this may provide an opportunity to impose arbitrary new requirements. It is important that this terminology be clarified, so that any future conflicts of interpretation are minimized.

With these observations, we concur in the approach being proposed by the staff, which emphasizes attention to aging phenomena, avoids the temptation to treat license extensions as relicensing, and makes a timely start toward providing an integrated policy for

dealing with aging phenomena.

Sincerely,

Carlyle Michelson  
Chairman

Reference:

Memorandum dated March 6, 1990 from Warren Minners, Office of Nuclear Regulatory Research, NRC, to Raymond F. Fraley, ACRS, Subject: Proposed rule on Nuclear Power Plant License Renewal, w/enclosure: Draft Commission paper, "Proposed Rule on Nuclear Power Plant License Renewal"