



UNITED STATES
NUCLEAR REGULATORY COMMISSION
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September 29, 2017

MEMORANDUM TO: Sheldon Stuchell, Chief
Projects Management and Guidance Branch
Division of License Renewal
Office of Nuclear Reactor Regulation

FROM: Bennett Brady, Senior Project Manager */RA/*
Projects Management and Guidance Branch
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SUBJECT: SUMMARY OF PUBLIC MEETING TO DISCUSS NRC STAFF'S
COMMENTS ON NEI 17-01, INDUSTRY GUIDELINE FOR
IMPLEMENTING THE REQUIREMENTS OF 10 CFR PART 54
FOR SUBSEQUENT LICENSE RENEWAL

On August 24, 2017, the U.S. Nuclear Regulatory Commission (NRC) held a Category 2 public meeting with stakeholders to discuss the NRC's staff comments on the Nuclear Energy Institute's (NEI's) "NEI 17-01, Industry Guideline for Implementing the Requirements of the *Title 10 of the Code of Federal Regulations* (10 CFR) Part 54 for Subsequent License Renewal, Revision 0." NRC provided comments with the intention that the comments will be incorporated into a revision of the industry guidance. If a revised NEI 17-01 is submitted and the NRC staff finds it acceptable for use by licensees, the NRC intends to update, "Regulatory Guide (RG) 1.188, Standard Format and Content for Applications to Renew Nuclear Power Plant Operating Licenses, Revision 1."

Meeting Summary

At the beginning of the meeting, NRC reviewed the steps to revise and issue RG 1.188, Revision 2. The NRC staff then described the development of their comments on NEI 17-01 (ADAMS Accession No. ML17228A684), including binning them, first, according to their significance in meeting the requirements of 10 CFR Part 54 and, second, in terms of providing acceptable aging management programs (AMP) and activities. The NRC staff also gave examples of comments that might be useful to readers of NEI 17-01.

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Comments on statements considered inconsistent with 10 CFR Part 54:

- Applicants cannot delay until some later time in the subsequent period of extended operation a technical rationale that demonstrates that the current licensing basis (CLB) will be maintained.
- Although an applicant may be able to demonstrate that it is not possible for an aging effect to result in a loss of the structures and components intended function(s), however the applicant must still manage the aging effect.
- The technical information in an application must contain and justify the methodology used for scoping and screening components into aging management reviews.
- An applicant cannot elect to defer completing the evaluation of a time-limited aging analysis (TLAA) until after submittal of the subsequent license renewal application (SLRA).

Comments that identify additional information necessary for applications, AMPs, and TLAAs

- AMPs should be enhanced when operating experience indicates that the effects of aging may not be adequately managed.
- If an applicant is taking an exception to a GALL-SLR AMP, the applicant needs to provide a justification on why the applicant's modified program, with respect to the identified exception or exceptions, is sufficient to maintain the CLB.
- The standard of comparison in the SLRA should be made to GALL-SLR AMPs.
- The initial submittal must contain sufficient information necessary for the NRC staff to complete its review, which could necessitate including specific portions of supporting documentation information in the SLRA.

Example of suggestions that may be useful for applications, AMPs, and TLAAs

- The reference to the pressurized thermal shock (PTS) rule should also reference the alternate PTS rule, 10 CFR 50.61a
- Remove reference to 71002 inspections as NRC will not be conducting 71002 inspections for subsequent license renewal.
- Section 4.7 of NUREG-2192 (SRP-SLR) provided an expanded list of potential plant-specific TLAAs. For plant-specific TLAA discussion in NEI 17-01, NEI should consider making the list of potential plant-specific TLAAs consistent with those in Table 4.7-1 of the SRP-SLR report.
- Include more detailed discussion of operating experience (OE) and enhancements of the AMP due to OE in the discussion of each AMP, for example, instances where OE has demonstrated that AMPs were not effective during the PEO.
- Consider adding criteria that would call for the SLRA to be peer reviewed by other licensed utilities or in combination with an industry organization.

The attendees agreed that another meeting to discuss license renewal topics should be held in October or later.

Public Comments:

A comment was provided from a member of the public participating via teleconference on past events at nuclear power plants that was not related to the meeting's discussion of draft documents for SLR.

Participants List:

Name	Affiliation
George Wilson	Nuclear Regulatory Commission (NRC)
Joe Donoghue	NRC
Sheldon Stuchell	NRC
Bill Rogers	NRC
Allen Hiser	NRC
Theresa Buchanan	NRC
Bennett Brady	NRC
James Medoff	NRC
Carol Moyer	NRC
Albert Wong	NRC
Mitzi Young	NRC
Bill Holston	NRC
Angela Buford	NRC
Heather Jones	NRC
James Gavula (via teleconference)	NRC
Evelyn Gettys	NRC
Jerud Hanson	Nuclear Energy Institute (NEI)
Paul Aiken	Dominion
John O'Rourke	PSEG Nuclear
Jana Bergman	Curtis Wright
Steve Franzone	FPL/NextEra
Albert Piha	Exelon
Craig Heah	Dominion
Steven Burdick	Morgan Lewis
Fred Polaski	Polaski Consulting
Marvin Lewis (via teleconference)	Self

SUBJECT: SUMMARY OF PUBLIC MEETING TO DISCUSS NRC COMMENTS ON NEI 17-01 DATED SEPTEMBER 29, 2017

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NRC Presentation ADAMS Accession No. ML17243A006 *concurrence via e-mail

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