



UNITED STATES
NUCLEAR REGULATORY COMMISSION
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December 14, 2017

MEMORANDUM TO: Eric Oesterle, Chief
License Renewal Project Branch
Division of Materials and License Renewal
Office of Nuclear Reactor Regulation

FROM: Bennett Brady, Senior Project Manager */RA/*
License Renewal Project Branch
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Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF PUBLIC MEETING TO FURTHER 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 November 14, 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 10 CFR Part 54 for Subsequent License Renewal, Revision 0." At an earlier meeting on August 14, 2017, NRC provided comments with the intention that the comments would be considered for incorporation into a revision of the industry guidance.

On October 19, 2017, NEI provided NRC staff a revision of their original document that responded to NRC's comments presented at the August 14, 2017 meeting. After reviewing the revised document, NRC staff had only four remaining comments.

Meeting Summary

Review of revised NEI 17-01

The meeting began with a discussion of four NRC comments:

1. Page 6, Section 1.6, on the Organization of the Guideline, NRC and industry agreed on the following statement:

The SLRA must contain sufficient information for the NRC staff to accept and docket the application, as described in NUREG-2192, Section 1.1.3.1, and to provide reasonable assurance that the staff can complete its review within the specified schedule. Applicants should also review recent license renewal industry experience and address relevant issues (e.g., outcomes from significant NRC RAIs) in their SLRAs.

2. In the table of Treatment of Consumables, page 24 of NEI 17-01, Industry agreed to take out the example of the basis for excluding Packing, Gaskets, Component Seals and O-rings from scoping and screening.

Consumable	Disposition
Packing, Gaskets, Component Seals and O-rings	These would not necessarily be called out explicitly in the scoping and screening. Instead they would be implicitly addressed at the component level. The applicant will be able to exclude these utilizing a clear basis such as the example of ASME Section III not being relied upon for pressure boundary.

3. NRC agreed that the example of an exception in NEI 17-01:

Expansion of the previous scope to include additional components, materials, environments, or aging effects/mechanisms, not included in the NUREG-2191 AMP scope

might be an “exception” in the case where the scope is expanded to meet consistency with the GALL-SLR AMP. An applicant has to justify an exception, but not an expansion.

4. NEI agreed to provide NRC’s comments on NEI 14-12, Aging Management Program Effectiveness, to the group responsible for updating NEI 14-12.

With the inclusion of these revisions, NRC agreed to send a letter to NEI stating that NEI 17-01 is approved for interim use by utilities during the endorsement process until the publication of Regulatory Guide (RG) 1.188, Revision 2, which will address any changes necessary for subsequent license renewal (SLR).

Optimization Process

The NRC has completed the “Optimization Process;” a review of the safety and environmental current activities for a more efficient review process for SLR. The key features of the new process include:

- Pre-application submittal meetings beginning twelve months and six months before the application is submitted for the environmental and safety applications, respectively
- An 18-month SLRA review schedule
- The audits include:
 - a. Aging Management Audit (Safety)
 - b. Local Aging Management Program Operating Experience Audit
 - c. In-Office Aging Management Audit via telecom/webinar breakout sessions
 - d. On-Site Aging Management Audit with regional participation to walk down specific material conditions and plant configurations
 - e. On-site environmental audit
- Applicant provided portal to support NRC staff in-office review

As a follow-up to the presentation on the Optimization Process, NRC agreed to provide:

1. Lessons learned from the River Bend Audit
2. The list of keywords for keyword searches of operating experience
3. A generic schedule or timeline for the application review

Participants also asked NRC staff to consider a more efficient way to provide questions to the applicant prior to the breakout sessions so that applicants would be able to collect information or develop information prior to the telecom/webinar breakout sessions. NRC might consider posting their questions or requests as part of the in-office AMP audit process or using the portal to post information requests prior to having the breakout sessions. There will always be additional questions that come up at the breakouts, but if known requests/questions can be posed ahead of time, more effective information transfer can be facilitated.

Late changes made to the subsequent license renewal guidance documents

The NRC staff also provided a list of changes that were made to the SLR guidance documents between May and July 10, 2017, when the final documents were published

Enclosure:
List of Participants

Meeting To Further Discuss NRC Staff's Comments On NEI 17-01, Industry Guideline For Implementing The Requirements Of 10 CFR Part 54 For Subsequent License Renewal

November 14, 2017

LIST OF PARTICIPANTS

Name	Affiliation
Joe Donoghue	Nuclear Regulatory Commission (NRC)
Eric Oesterle	NRC
Bill Rogers	NRC
Allen Hiser	NRC
Angela Buford	NRC
John Tsao	NRC
Bennett Brady	NRC
James Medoff	NRC
Seung Min	NRC
Albert Wong	NRC
Steve Bloom	NRC
Lois James	NRC
Evelyn Gettys	NRC
Roger Kalikian	NRC
William Burton	NRC
Phyllis Clark (via teleconference)	NRC
Alex Chereskin (via teleconference)	NRC
David Jijamco (via teleconference)	NRC
Jerud Hanson	Nuclear Energy Institute (NEI)
Paul Aiken	Dominion
John O'Rourke	PSEG Nuclear
Jana Bergman	Curtis Wright
John Hufnagel	Exelon
Albert Piha	Exelon
Craig Heah	Dominion
John Dissavay	Dominion
Paul Bessette	Morgan Lewis
Fred Poussia	Self
Chris Browne	Alliance Nuclear
Brian Jelke	Sargent Lundy
Gary Young	Entergy
Michael Semmler (via teleconference)	Westinghouse Electric Company
Lynne Goodman (via teleconference)	DTE Energy
Eric Blocher (via teleconference)	Dominion
Andrew Taylor (via teleconference)	Sargent & Lundy

Enclosure

SUBJECT: SUMMARY OF PUBLIC MEETING TO FURTHER DISCUSS NRC STAFF'S COMMENTS ON NEI 17-01, INDUSTRY GUIDELINE FOR IMPLEMENTING THE REQUIREMENTS OF 10 CFR PART 54 FOR SUBSEQUENT LICENSE RENEWAL

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Meeting Summary Accession No. ML17346B294

Meeting Slides and Agenda Accession No. ML17347B561

NRC Presentation Slides Accession No: ML17347B560

Changes To SLR Guidance Documents Accession No. ML17347B562

OFFICE	PM:MRPB:DMLR	LA:MRPB:DMLR	BC:MRPB:DMLR
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DATE	12/14/17	12/14/17	12/14/17

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