

NUCLEAR MANAGEMENT AND RESOURCES COUNCIL

1776 Eye Street, N.W. • Suite 300 • Washington, DC 20006-2496 (202) 872-1280

October 6, 1989

Dr. R. Wayne Houston, Director Division of Safety Issue Resolution Office of Regulatory Research U. S. Nuclear Regulatory Commission Washington, DC 20555

Dear Dr. Houston:

Enclosed is the "Methodology to Evaluate Plant Equipment For License Renewal." This document was developed by the Department of Energy in support of the NUMARC NUPLEX Working Group efforts to foster the timely establishment and demonstration of a viable license renewal option and regulatory process. The methodology begins with a systematic evaluation of all plant systems and structures, followed by a more focused evaluation on the component level. At each step, the evaluation focuses upon a decreasing subset of equipment. Application of the methodology should result in an effective and efficient review of the plant and should serve as a technical basis for the scope of license renewal, a focus for license renewal evaluations, and a foundation for the license renewal process and regulations.

NUMARC requests the NRC to approve this document so that it may be referenced by nuclear utilities in an application for license renewal. Application of the methodology would result in defining the scope of license renewal review for an individual nuclear power plant. Due to the significant role of this document in defining the scope of license renewal review, the NUMARC NUPLEX Working Group requests a meeting with the Staff, as early as possible, prior to completion of their formal review. The purpose of the meeting is to provide clarification or verification of the process as deemed necessary.

The licensees of the industry's Lead Plant License Renewal Demonstration Program are presently engaged in applying the methodology to their facilities. It is expected that the two Lead Plants will provide to the Staff, in the near future, the results of their system evaluations and the component level evaluations of a pilot system. The methodology document coupled with the Lead Plant pilot system applications should provide a clear illustration of the process. Application of the methodology would result in defining the scope of license renewal for an individual nuclear power plant.

This document is in accordance with 10CFR170.11(b)(1), as such the review fee for the methodology is to be waived. The attached letter from Mr. Scroggins, Deputy Director for Finance Management and Controller, to NUMARC dated February 3, 1989 documents authorization of the fee waiver.

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Dr. R. Wayne Houston Page 2 October 6, 1989

We look forward to meeting with the NRC. If there are any questions concerning the submitted methodology, please contact me or Tricia Heroux of the NUMARC staff.

Sincerely,

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William H. Rasin Director, Technical Division

TAH

Attachment

- cc: F. Gillespie, NRC/NRR/PMAS D. Cleary, NRC/RES/RPSIB F. Akstulewicz, NRC/NRR/PTSB



UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. SUBS

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Nuclear Management and Resources Council ATTN: Mr. William H. Rasin Director, Technical Division 1776 Eye Street, N. W. - Suite 300 Washington, DC 20006-2496

Gentlemen:

Your letter dated November 29, 1988, to Mr. R. Wayne Houston of this agency requested a waiver of fees pursuant to 10 CFR 170.11(b)(1) for a series of technical reports that you will be submitting to NRC for review and approval. These reports relate to the methodology for identifying and evaluating plant equipment for license renewals for nuclear power plants.

We have reviewed the data provided in your request. While these reports meet the criteria for topical reports since they will be referenced by reactor licensees, we have determined that an exemption from the requirements of 10 CFR 170 for them is authorized by law and is otherwise in the public interest. Therefore, pursuant to 10 CFR 170.11(b)(1), you are hereby granted an exemption from the fee requirements of 10 CFR 170 for the license renewal methodology technical reports.

Sincerely,

Ronald M. Scroggins, Deputy Director for Financial Management and Controller Office of Administration and Resources Management