

NOTATION VOTE

RESPONSE SHEET

RELEASED TO THE PDR  
2/9/94  
date initials

TO: SAMUEL J. CHILK, SECRETARY OF THE COMMISSION  
FROM: COMMISSIONER DE PLANQUE  
SUBJECT: SECY-93-331 - LICENSE RENEWAL WORKSHOP  
RESULTS AND STAFF PROPOSALS FOR REVISION TO  
10 CFR PART 54, "REQUIREMENTS FOR RENEWAL OF  
OPERATING LICENSES FOR NUCLEAR POWER PLANTS"

APPROVED X(in part)  APPROVED X(in part) ABSTAIN \_\_\_\_\_

NOT PARTICIPATING \_\_\_\_\_ REQUEST DISCUSSION \_\_\_\_\_

COMMENTS:

See attached comments.

9402160259 940124  
PDR COMMS NRCC  
CORRESPONDENCE PDR

150042

E. Guil de Planque  
SIGNATURE

RELEASE VOTE

January 24, 1994

DATE

WITHHOLD VOTE

ENTERED ON "AS" YES  No \_\_\_\_\_

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Commissioner de Plaque's comments on SECY-93-331.

I commend the staff for its diligence in addressing the complex issues associated with the regulatory and technical processes that affect license renewal. In particular, the concepts advanced as part of the new definition of ARDUTLR, to focus in on those SSC that are of most importance, are extremely significant. Thus, I basically agree with the proposed changes to Part 54 generally along the lines described in SECY-93-331, with the exceptions more fully discussed below.

I agree with my fellow Commissioners that under the SECY approach, the staff will need to fully develop and explain the changes to the rule, with particular attention to such issues as how functionality (or ITLR function) will result in maintaining the CLB, and how it will be determined that existing programs "reasonably assure that the SC will be capable of performing its important to license renewal function ..." (54.3 (a) (2) (iii)).

However, I share some of Commissioner Rogers' reservations concerning the term ARDUTLR (especially the words behind the acronym). In order to preserve the word ARDUTLR itself, which was introduced into Part 54 very late in the rulemaking (at the revised final rule stage), it seems to be necessary to introduce more and more new terms and definitions, resulting in considerable convolution and potential for confusion.

In fact, there may well be a much simpler way to accomplish the dispositioning of SSCs<sup>1</sup>. I recognize that dropping the term ARDUTLR per se may seem to represent even more of a departure from the current Part 54 than does SECY-93-331; however, I think it can be done without changing the basic approach, it has the potential to resolve some of the concerns that have been noted, and I believe that the changes currently contemplated by the staff are already more than a minor adjustment to the rule. Thus, I would propose that the staff also consider whether more straightforward changes, such as those noted below, might not be worthwhile in the long run.

Both ITLR and ARDUTLR appear to be problematic. Under an approach that retains the concepts but changes the awkward terminology, I would drop both of these terms and substitute a new "term-of-art", which for purposes of discussion I will call

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<sup>1</sup>With any approach, one important issue requiring some further discussion is to resolve and clarify the use of the terms of SSCs and SCs and how one moves from the general SSCs down to specific SCs and RPs.

"key SCs"<sup>2</sup>. This term would capture both the scope idea from ITLR and the concept of aging effects from ARDUTLR.

This substitution for ARDUTLR (in 54.3) would be defined as:

" Key SCs" are those (which meet one of the criteria for ITLR)<sup>3</sup> and which are subject to age-related degradation, the effects of which, notwithstanding the application of existing programs during the period of extended operation, could result in loss of function not in accordance with the current licensing basis during the period of extended operation. For purposes of this definition,

- (1) An SC is "key" if:
  - (i) its service life exceeds 40 years; and
  - (ii) it is passive; and
  - (iii) its failure would directly result in loss of system or component function not in accordance with the CLB during the period of extended operation.
- (2) An SC, not identified under (1) above, is not "key" if it is:
  - (i) included in the provisions of 10 CFR 50.65; or

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<sup>2</sup>This might be called something like the "SCs (or SSCs) of specific concern to license renewal"

<sup>3</sup>Suitable language should be inserted here to capture the four part definition of SSC-ITLR. It may be possible to even eliminate this definition. The concept of SSC-ITLR was developed to ensure that a licensee would consider the full scope of plant equipment that might be of concern for aging effects. Since it now appears to be possible to focus in on the SSCs most of concern (per item (1) of ARDUTLR) then there may no longer be a benefit to defining SSC-ITLR as a set, or to identifying and listing all SSC-ITLR in the IPA. Rather, the licensee could consider the full range of plant equipment, and focus in on the "Key" or ARDUTLR set relatively quickly. The licensee would be expected to describe in the IPA its method for identifying Key SCs, and therefore, what scope they had considered. Based on staff experience with the Owners Groups and preliminary applications, the staff presumably has a good idea of what SC are likely to be "Key".

- (ii) replaced such that the service life is less than 40 years; or
- (iii) included in an existing program or activity that monitors performance or condition and reasonably assures that the SC will be capable of performing its function in accordance with the current licensing bases during the period of extended operation.

The definition of IPA (in 54.3) would also need to be changed to:

...demonstrates that key SCs have been identified and that the effects of age-related degradation will be managed...

It is also necessary to revise the definition of Renewal Program to:

An RP is a documented program for a key SC that manages the effects of age-related degradation to provide reasonable assurance that it (the key SC) will continue to perform its required function (in accordance with CLB?) during the period of extended operation.

In Section 54.21, the IPA would then require:

- (i) Identify and list key SC
- (ii) Describe and justify the methods used to determine whether or not an SC is key.
- (iii) For each key SC demonstrate that the effects of age-related degradation:
  - (a) are addressed through a renewal program, or
  - (b) need not be addressed in a renewal program
- (iv) Describe the applicable renewal programs and demonstrate that these programs will be effective in maintaining the CLB during the period of extended operation.

Present sections 54.21 (b) and (c) would need to be adjusted to refer to time-limited analyses or key SCs (as appropriate) instead of ARDUTLR.

Under 54.29 (a), the text should be revised to:

Actions have been identified and have been or will be taken with respect to the effects of age-related degradation for key SCs and with respect to any time-