

NOTATION VOTE

RESPONSE SHEET

RELEASED TO THE PDR  
2/9/94 *g*  
date initials

TO: SAMUEL J. CHILK, SECRETARY OF THE COMMISSION  
FROM: THE CHAIRMAN  
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        <sup>w/comments</sup> DISAPPROVED        ABSTAIN         
NOT PARTICIPATING        REQUEST DISCUSSION       

COMMENTS:

9402160286 940112  
PDR COMMS NRCC  
CORRESPONDENCE PDR

*Melli*  
\_\_\_\_\_  
SIGNATURE

RELEASE VOTE  / XX /

January 12, 1994  
\_\_\_\_\_  
DATE

WITHHOLD VOTE

ENTERED ON "AS" YES  No       

150045

DF02

THE CHAIRMAN'S COMMENTS ON SECY-93-331

I believe the staff has made considerable progress in addressing issues associated with the license renewal rule and should be commended. It is appropriate for the focus of license renewal to be the management of the effects of aging on important systems structures and components (SSC), since this is the best means for ensuring they function as intended. With this approach staff can give appropriate credit for existing licensee programs that address the effects of aging in the license renewal process such as licensee activities to address the maintenance rule, replacement, refurbishment, etc. Staff's focus and detailed analyses could then be on: 1) important long-lived passive SCs where it would be difficult to monitor the effects of aging, 2) those issues related to explicit time-limited safety analyses, and 3) those issues for which there is no existing program to ensure the functional capability of an important SSC. As Commissioner Rogers observed, the previous rule which required the identification and evaluation of mechanisms could constitute an open-ended research project, and in the long run may not ensure the function of important SSCs.

Therefore, I agree with the staff's conceptual approach to rulemaking to modify 10 CFR Part 54. Of course, in developing the proposed rule the staff will have to develop fully the bases for the changes to the rule. Although I believe that staff could draft language that would eliminate the use of the term ARDUTLR and implement other staff proposals in SECY-93-331, such steps might break the continuity with the previous rule, for advantages which are not entirely clear. I am concerned that eliminating the term ARDUTLR and developing alternative terminology would put at risk the substantial effort which has already gone into developing a public discourse of what ARDUTLR meant. Therefore, I believe the staff should devote its effort to developing a well reasoned rationale why the staff will focus on certain structures and components in their reviews for license renewal while others are excluded. In addition, the staff should clarify why we now would propose to focus on effects and renewal programs or existing programs versus mechanisms.

I would like to see special emphasis given to the following topics:

- (a) ensuring equipment functionality is a sufficient basis for concluding that the CLB will be maintained,
- (b) the extent to which safety margins in the CLB are preserved and maintained through a functionality approach,
- (c) ensuring that a definition of ARDUTLR is precise as possible about those issues with direct health and safety impact for the extended 20 year period that the staff intends to examine in detail, and for which staff is going to rely on existing programs, and

(d) clarifying terms such as "ITLR function" to be specific as possible as what the staff is going to look at in license renewal and for which we are going to rely on existing programs. (It is my understanding that some SSCs ITLR may have functions that would not have a direct safety impact and would not be examined by the staff in the license renewal application process.)