



OFFICE OF THE SECRETARY

UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D.C. 20555

February 3, 1994

RELEASED TO THE PDR 2/9/94 [Signature] date initials

MEMORANDUM TO: James M. Taylor Executive Director for Operations FROM: Samuel J. Chilk, Secretary 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"

The Commission (with all Commissioners agreeing) agrees with the staff's conceptual approach to performing license renewal reviews. The Commission agrees that a detailed Statement of Considerations (SOC) should be developed providing the bases for the revised rule and changes from the original rule. The Commission also believes that the revised rule should be simplified.

In this regard, the staff should prepare a SOC and rule that reflect the following points:

The Commission believes it is appropriate for the focus of license renewal to be the management of the effects of aging on important SSCs during the period of extended operation (as defined in the current rule) since this is the best means for ensuring they function as intended. The previous indications in the Part 54 SOC that there should be an identification and evaluation of aging mechanisms prior to license renewal could constitute an open-ended research project, and in the long run may not ensure the function of important SSCs.

The Commission fully supports the principles provided in the SOC of the original license renewal rule. In particular, the Commission believes the existing regulatory process, continued in the period of extended operation, ensures the CLB maintains an acceptable level of safety with the possible exception of detrimental effects of aging on the functionality of certain SSCs

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during the period of extended operation. This is the concept of age related degradation unique to license renewal (ARDUTLR) in the current rule. However, the term ARDUTLR has resulted in confusion about the Commission's intended focus for license renewal. Therefore, the Commission sees no reason that the term ARDUTLR need appear in the Part 54 rule itself. The SOC should state as clearly and as succinctly as possible the rationale for selection of those SSCs which must be reviewed for the extended period, and why others are excluded. The SOC would explain that those SSCs which are to be the subject of renewal review are limited to those SSCs which may require additional assurance that the CLB for these SSCs will be maintained during the extended period. Existing licensee maintenance activities (e.g., replacement, refurbishment, etc) maintain functionality by managing aging effects, and licensee monitoring activities associated with implementation of the maintenance rule will continue throughout the renewal period. The SOC should explain the connection between CLB compliance and functionality, and conclude that therefore, the only important SSCs that need to be reviewed for the extended period of operation are: 1) certain long-lived passive SSCs (as described in SECY-93-331), and 2) those SSCs which have explicit time-limited safety analyses. These SSCs could be referred to as "reviewable SSCs" or some other suitable term.

The important objective for the rule is to identify reviewable SSCs and to ensure their functionality in the period of extended operation by ensuring the management of aging effects. The rule should be simplified to identify the categories of SSCs that need to be reviewed for the extended period. The Commission envisions that the staff would retain the integrated plant assessment process, clearly identify that the principal emphasis for license renewal technical evaluation is on important passive long-lived structures and components and on issues relating to SSCs whose safety was premised on explicit time-limited analyses, and clearly identify where we will rely on existing programs, including the maintenance rule. It would still be the responsibility of the licensee to perform the IPA to identify those SSCs that require further technical evaluation and those SSCs which are covered by existing programs.

In addition to the above matters, the staff should give special emphasis to the following when preparing the SOC and the proposed rule:

- (1) avoid use of such terms as "ITJR function" and be as specific as possible as to what SSCs the staff will look at for license renewal and for what SSCs the staff will rely on existing programs.
- (2) provide a consistent rationale for referring to SCs as opposed to SSCs.

- (3) ensure that the approach the staff uses permits the finding to be made that the CLB will be maintained during the period of extended operation for the reviewable SSCs.

The staff, upon preparing the proposed rule and SOC, should forward the proposed rulemaking package to the Commission for review and approval prior to publication.

(EDO)

(SECY Suspense:

5/27/94)

cc: The Chairman  
Commissioner Rogers  
Commissioner Remick  
Commissioner de Planque  
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Office Directors, Regions, ACRS, ACNW, ASLBP (via E-Mail)