



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

April 2, 1993

OFFICE OF THE
COMMISSIONER

MEMORANDUM FOR: James M. Taylor
Executive Director for Operations

FROM: James R. Curtiss *J. R. Curtiss*

SUBJECT: LICENSE RENEWAL ISSUES

I have reviewed your memorandum of March 24, 1993 on the subject of license renewal, wherein you outlined the staff's intent to develop further information on the matters addressed in SECY-93-049. After discussing this initiative in some detail with the relevant staff members, I wanted you to know that I strongly endorse the staff's recommended course of action and believe that it will shed considerable light on a number of key questions associated with the implementation of Part 54. Of particular interest to me are the following issues, all of which I understand will be addressed as part of this initiative:

- (1) the level of detail required in a renewal application, including further amplification upon how much detail must be submitted as part of the application itself (and what the practical implications are of a licensee "describing" versus "submitting" its effective program in the renewal application);
- (2) the circumstances under which matters that are included as part of a licensee's effective program must be addressed via technical specifications or other docketed commitments;
- (3) the meaning of the term "acceptance criteria" as that term applies to effective programs; and
- (4) the enforcement implications of the staff's approach to the foregoing issues.

Additionally, I would expect that in addressing the foregoing questions, the staff's initiative will, of necessity, require a clear understanding with respect to how the terms "character" and "magnitude", as those terms are used in the definition of age-

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related degradation unique to license renewal in Part 54, are to be interpreted and applied.

I look forward to the results of this effort.

cc: Chairman Selin
Commissioner Rogers
Commissioner Remick
Commissioner de Planque
SECY
OGC

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