

PDR



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

May 18, 1992

PUBLIC SERVICE

Mr. Robert D. Binz IV, Chairman
BWR Owners' Group
c/o Public Service Electric & Gas Company
Hope Creek Generating Station
P.O. Box 236, Mail Code N51
Hancocks Bridge, New Jersey 08038

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Dear Mr. Binz:

SUBJECT: LICENSE RENEWAL FATIGUE EVALUATION PROCEDURES

Your April 20, 1992, letter to W.T. Russell discussed BWR Owners' Group's concerns and provided comments to the Nuclear Regulatory Commission (NRC) staff's draft procedures (PDLR D-1) which define the process to be used for the evaluation of fatigue degradation as part of future license renewal application reviews. There appears to be some confusion concerning these procedures. The NRC has not "issued" a draft Branch Technical Position on this subject. The staff has, as a result of its review of industry reports related to license renewal, prepared a draft Branch Technical Position for license renewal PDLR D-1. The criteria contained in PDLR D-1 is currently under NRC review and will be issued for public comment in the summer of 1992, as part of the draft Standard Review Plan for License Renewal. The criteria may be revised as experience is gained in reviewing license renewal lead plant applications.

The document referenced in your letter was prepared to facilitate technical discussion of fatigue degradation in the context of license renewal. To that end, PDLR D-1 has been a very successful document which has highlighted the need for the staff to develop fatigue evaluation criteria for license renewal and publish these criteria for public comment. Each of the technical issues contained in your letter will be considered as part of the staff's evaluation of comments as it continues to develop license renewal application review criteria. A significant research effort, which addresses this issue, is continuing. The results of this research, as well as additional public comments, will also be considered in the development of fatigue evaluation criteria for license renewal.

Additionally, you stated a concern that should this criteria be adopted for license renewal, it could also be extended to all plants. This staff has and will continue to ensure that any requirements or criteria related to license renewal are not unduly imposed upon currently operating plants. This was one of the conditions in the staff's decision to prepare a new standard review plan which specifically addresses license renewal. As is the current practice, when an issue is identified which is related to the safe operation of any nuclear plant, the staff will ensure that it is evaluated for appropriate actions through the established regulatory process.

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Mr. Robert D. Binz

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Finally, the staff does not, based upon the information and test results currently available, agree with your conclusion that environmental effects on fatigue resistance for systems designed for 40 years of plant operation do not need to be considered as part of a determination of whether or not a nuclear power plant should be granted a renewed license to operate for up to 60 years.

Sincerely,

Original signed by:
Dennis M. Crutchfield, Acting Associate Director
for Advanced Reactors
Office of Nuclear Reactor Regulation

cc: Edward Griffing, NUMARC

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