



UNITED STATES
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April 27, 2020

MEMORANDUM TO: Lauren K. Gibson, Acting Chief
License Renewal Projects Branch
Division of New and Renewed Licenses
Office of Nuclear Reactor Regulation

FROM: William F. Burton, Senior Project Manager **/RA/**
License Renewal Projects Branch
Division of New and Renewed Licenses
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF APRIL 7, 2020 TELECONFERENCE ON TOPICS
RELATED TO LESSONS LEARNED FROM THE REVIEW OF THE
FIRST SUBSEQUENT LICENSE RENEWAL APPLICATIONS

On April 7, 2020, the U.S. Nuclear Regulatory Commission (NRC) held its fourth Category 2 public meeting to discuss the NRC staff and industry experience in the reviews of the first three Subsequent License Renewal (SLR) applications: Turkey Point Nuclear Generating Units 3 and 4, Peach Bottom Atomic Power Station, Units 2 and 3, and Surry Power Station, Units 1 and 2. Prior meetings were held on March 28, 2019, December 12, 2019, and February 20, 2020. In the morning session of this meeting, the staff discussed the activities of Embark Venture Studios, an organization tasked with removing barriers and encouraging innovation to improve work processes. The afternoon session discussed the status and schedule for issuing Interim Staff Guidance documents (ISGs) which proposes revisions to NUREG-2191 (the Generic Aging Lessons Learned Report for SLR (GALL-SLR)) and NUREG-2192 (the Standard Review Plan for SLR (SRP-SLR)).

A summary of the discussion topics is provided below.

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Main Messages

- The NRC staff and the industry are aligned on many of NEI's proposed revisions.
- No further discussions between the staff and industry are planned before the draft ISGs are available for use and comment.

Summary of Discussions

Approximately 167 participants attended the meeting.

Following the welcome of meeting attendees, NEI and the staff discussed the following items:

Morning Session

NRR's EMBARK Venture Studio project office representatives discussed the EMBARK mission and its "Risk Inform Subsequent License Renewal" project. The staff presented initial concepts concerning the use of risk information, technical review methods, and project management practices, to increase the efficiency and effectiveness of the staff's subsequent license renewal application reviews. The presentation focused on the staff's methods used in the consideration of operating experience as related to aging management programs. NEI representatives, licensees, and other members of the public provided feedback, which will inform the staff's continued evaluation of the subsequent license renewal process.

Afternoon Session

During the public meeting on February 20, 2020, the industry requested that meetings be held between the quarterly lessons learned meetings to provide opportunities to discuss specific technical subjects in more depth than is possible during the quarterly Lessons Learned Meetings. In response to the industry's request, the staff held two interim meetings on March 25, 2020 and April 3, 2020 (see Agencywide Document Access Management System (ADAMS) Accession Nos. ML20107F702 and ML20107F733, respectively).

During this April 7 meeting, the staff summarized the content of these meetings, which included discussions of the management of reactor pressure vessel supports, of a proposed addition of a line item to manage aging in fiberglass tanks exposed to fuel oil, and revisions to AMPs XI.M16A (PWR Vessel Internals), XI.M42 (Internal Coatings), XI.S1 (ASMR Section XI, Subsection IWE), and XI.S8 (Protective Coatings).

Following the summary of the March 25 and April 3 interim meeting, the staff provided a status of the ongoing activities related to the issuance of the first set of ISGs intended to be used by utilities who plan to submit SLR applications.

The first set of ISGs document changes proposed by the industry to the GALL-SLR and SRP-SLR to reflect staff and industry experience in the preparation and review of the Turkey Point, Peach Bottom, and Surry SLR applications. Four ISGs will be issued to document guidance changes to better manage aging in mechanical, structural, and electrical structures and components, and PWR vessel internals. These ISGs will be issued by mid-June for use and comment.

The staff next provided an overview of the changes being made to the management of PWR vessel internals to reflect the recent approval of MRP-227 Revision 1A.

Following this, the meeting turned to a discussion of the revisions proposed by industry to address F-J items.

The industry had originally proposed 16 revisions to the current guidance which would reduce or eliminate the number of issues that would require an F-J note. During the interim meeting held on April 3, industry asked the staff to identify specific F-J revisions that staff feels require more explanation or justification. In response, the staff requested further explanation for the proposed revisions related to fireproofing/fire barriers in AMP XI.M26 (Fire Protection) and to the industry's request to add an AMR item to manage cumulative fatigue damage of the stainless steel spent fuel pool liner.

Following these discussions, the staff discussed the current status, plans, and schedule to issue the ISGs.

There will be two sets of ISGs that will be issued for use and comment. The first set of ISGs will include revisions proposed by the industry and approved by the staff. The second set of ISGs will include revisions proposed by the staff.

A tentative schedule was provided for the issuance of the first set of ISGs. These ISGs will be issued for use and comment by mid-June with a 30-day comment period ending in mid-July. Several public meetings will be scheduled during the comment period to help inform those who plan to submit comments. The final ISGs will be issued in mid-October.

The second set of ISGs will be developed after the first set of ISGs are completed. The industry then shared its reasons for requesting changes related to fireproofing/fire barriers in AMP XI.M26 (Fire Protection) and to the industry's request to add an AMR item to manage cumulative fatigue damage of the stainless steel spent fuel pool liner. The industry noted that they requested AMR items to manage cracking and loss of material in subliming compound, cementitious coating, and silicate fireproofing/fire barriers because most licensees use them.

The staff is considering the reasons for the changes to managing the fireproofing/fire barriers but does not believe the proposed changes to managing the spent fuel pool liner plate is justified. Discussions may continue during and following the comment period.

Next Lessons Learned Meeting

The next quarterly Lessons Learned Meeting will be held in July 2020. The agenda will include the status of subsequent license renewal activities spearheaded by Embark Venture Studios as well as the status of the ISGs

Public Participation

Following the main discussions, members of the public were invited to provide comments or ask questions about the discussions. Only members of the industry participated in this portion of the meeting..

Action Items/Next Steps

In addition to issuing the first set of ISGs according the schedule, the next actions include scheduling the fifth Lessons Learned meeting for July 2020. The agenda will include the latest SLR-related activities from the EVS and the status of the ISGs.

Handouts

- Staff slides (morning session) – ML20097F786
- Industry slides (morning session) – ML20092K606
- Staff slides (afternoon session) – ML20093G062
- Industry chart for MRP-227 Revision 2A – ML20097F875
- Staff slides – summary of gap analysis based on MRP-227 Revision 1A – ML20098C399
- Industry list of proposed revisions to the F-J notes - ML20093E405