



UNITED STATES
NUCLEAR REGULATORY COMMISSION
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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 MARCH 25, 2020 TELECONFERENCE ON
TOPICS RELATED TO LESSONS LEARNED FROM THE
REVIEW OF THE FIRST SUBSEQUENT LICENSE RENEWAL
APPLICATIONS

On March 28, 2019, the U.S. Nuclear Regulatory Commission (NRC) held a Category 2 public meeting to discuss the NRC staff and industry experience in the review of River Bend Station, Unit 1 initial license renewal application which piloted the optimized 18-month review process for subsequent license renewal (SLR) applications, as well as the reviews of the first three 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. At this meeting, the staff and industry agreed that the highest priority was the identification of technical issues for which revisions to the Generic Aging Lessons Learned (GALL-SLR) and Standard Review Plan for Subsequent License Renewal (SRP-SLR) (NUREG-2191 and NUREG-2192, respectively) guidance documents are needed.

On December 12, 2019, the NRC held a second Category 2 public meeting to discuss lessons learned from the NRC staff reviews of the three SLR applications. The focus of this second meeting was on the technical issues that are ready for inclusion in revisions to the SLR guidance documents.

On February 20, 2020, the NRC held a third Category 2 public meeting to continue discussions regarding lessons learned from the review of the SLR applications. The focus of this third meeting was the review of summaries prepared by the staff that address guidance revisions proposed by the industry. The staff was in alignment with the industry on most of the proposed revisions. During this meeting, the industry requested that meetings be held between the quarterly lessons learned meetings to allow opportunities to discuss specific technical subjects in more depth than is possible during the quarterly meetings.

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On March 25, 2020, the NRC staff hosted the first interim meeting on several topics of interest to the staff and industry.

A summary of the discussion topics is provided below.

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Main Messages

- The U.S. Nuclear Regulatory Commission (NRC) staff and the industry are aligned on many of NEI's proposed revisions.
- Another interim discussion would be held prior to the next lessons learned meeting on April 7, 2020.

Summary of Discussions

Approximately 30 participants attended the meeting.

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

AMP XI.S8: Protective Coatings Monitoring and Maintenance

Subject: Industry request to revise Element 4 (Detection of Aging Effects) to (a) state requirements of ASTM Spec D5163-08, paragraph 6 and (b) to state that the frequency of in service coating inspections shall be determined by the Licensee.

At the meeting, the staff provided the initial NRC staff feedback on the industry proposal, including the staff's intention to add language that discusses some steps that licensees need in order to take advantage of an extended frequency. This includes a description of available strainer margins to accommodate coatings debris and a description of operating experience with respect to how much degraded coatings have been identified and trended.

AMP XI.M42: Internal Coatings

The staff and industry discussed the appropriate period to review OpE. The industry proposes a lookback period of 5 years as opposed to 10 years. The staff will provide its latest markup of the AMP and continue discussions on this topic prior to the April 7, 2020 Lessons Learned Meeting.

AMP XI.M16A: MRP-227-1A

The staff gave a brief overview of the revisions to the GALL-SLR and SRP-SLR based on MRP-227 Revision 1A. More detailed information would be provided during another telecon prior to the April 7, 2020 Lessons Learned Meeting.

AMP XI.S1: ASME Section XI, Subsection IWE

The staff and industry are beginning to align on language which would allow an applicant not to take an exception to the AMP if an applicant wants the staff to consider a fatigue waiver if a fatigue analysis is not part of its current licensing basis. However, if language can't be agreed to, the staff and industry agreed to consider including this in the second set of ISGs that will be issued later. The staff will provide its proposed draft language and discussion will be continued in a telecon prior to the April 7, 2020 Lessons Learned Meeting.

Further Evaluation Regarding Reactor Pressure Vessel Steel Supports

The staff and industry agreed to postpone further consideration of revisions to this Further Evaluation and considered that it may be best to delay revisions to the Further Evaluation for inclusion in the second set of ISGs that will be issued later. The industry will provide written comments on the proposed draft ISG and continue the discussions during a telecon prior to the April 7, 2020 Lessons Learned Meeting.

The proper use of non-staff-approved EPRI documents and topical reports was also discussed.

Aging Management of Spent Fuel Pool Liner

The industry requested the staff to consider adding an AMR item to manage cumulative fatigue damage to stainless steel in a treated water or borated treated water environment using TLAA 4.7, "Other Plant-Specific Time-Limited Aging Analyses." The staff does not believe that a new AMR item is necessary.