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Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attention: Docketing and Service Branch

Subject: Comments on Development of Policy for Nuclear Power Plant License
Renewal (Federal Register Notice 51FR40334, November 6, 1986)

Dear Sir:

Yankee Atomic Electric Company (YAEC) appreciates the opportunity to reply to the subject NRC request for comments on the development of policy for nuclear power plant license renewal. YAEC owns and operates a nuclear power plant in Rowe, Massachusetts. Our Nuclear Services Division also provides engineering and licensing services for other nuclear power plants in the Northeast, including Vermont Yankee, Maine Yankee, and Seabrook.

The Atomic Industrial Forum (AIF) and the Nuclear Utility Plant Life Extension (NUPLEX) Steering Committee are filing detailed comments on the subject NRC questions. YAEC has been actively involved in the development of these responses and generally supports both of them. In addition, we would like to offer the following comments.

It is our firm conviction that there is nothing special about year 40 in the life of a nuclear power plant. The level of safety expected on the first day of facility operations is the same as that which is expected in year 40 and, indeed, the same as should be expected in subsequent years of operation. Activities to maintain that level of safety throughout an extended license term will not differ largely from those activities conducted during the first 40 years, except for the extent to which age-related degradation will be monitored and evaluated.

As facilities begin to experience the incremental effects of age-related degradation, licensees may need to evaluate more frequently the reliability and capability of plant components, structures, and systems using preventative maintenance and monitoring data, engineering calculations, and probabilistic risk methods. The results from such evaluations will continue to be used to determine when refurbishment, upgrading, and/or replacement would be necessary to assure that critical components, structures, and systems will continue to perform satisfactorily throughout the remaining term of intended operation, whatever length that ultimately becomes.

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With this in mind, we conclude that application for license renewal should involve a limited review - founded on continuation of the existing licensing basis for the facility and consisting primarily of confirmation of the effectiveness of preventative maintenance and monitoring programs to deal with age effects on safety-related components, structures, and systems such that overall plant safety is unchanged.

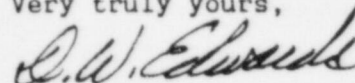
In conjunction with this review, we urge the Commission to recognize, in particular, the importance of a facility's performance history in demonstrating the adequacy of its operation for an extended term. A track record of safe operation during the initial licensed term serves to provide a high level of confidence that conformance with the existing licensing basis results in facility operations that meet, if not routinely exceed, the level of safety dictated by the regulations. Such a track record also demonstrates that the combination of hardware and personnel comprising the "licensed facility" will continue to perform in a manner which will not compromise this level of safety. In addition to the assurance derived from a facility's performance history, further assurance that an acceptable level of safety will always be maintained can be concluded from other NRC controls, such as the routine and special inspection activities of regional and resident inspectors.

Demonstrating to the NRC that during an extended license term there will exist reasonable assurance that the public health and safety will be adequately protected is certainly the licensee's responsibility. However, because each plant's design and performance history are somewhat different, we contend that each licensee will need to demonstrate such assurance in a manner most suitable to their own unique situation. Therefore, we urge the Commission to adopt a license renewal policy and regulations which allow the latitude needed for each plant to demonstrate compliance in the manner best suited to that plant. This is particularly necessary for the older, and perhaps, least "standard" plants which will first need license extension.

In conclusion, we urge the Commission to include and expound the following key concepts in its license renewal policy:

- o limited review to confirm that age-related effects on safety-related components and systems will not impinge overall plant safety,
- o continuation of the same standard of safety that was required during the original term through any extension to that term,
- o incorporation of a facility's performance history and its existing licensing basis as the two major components of the NRC's evaluation, and
- o latitude for each plant to demonstrate compliance in a manner best suited to that plant.

Very truly yours,



D. W. Edwards

Director of Industry Affairs