

DRAFT OMB SUPPORTING STATEMENT
FOR
10 CFR PART 54
REQUIREMENTS FOR RENEWAL OF OPERATING LICENSES FOR
NUCLEAR POWER PLANTS
3150-0155

EXTENSION

DESCRIPTION OF THE INFORMATION COLLECTION

Title 10 of the *Code of Federal Regulations* (10 CFR) Part 54 establishes license renewal requirements for operating nuclear power plants. Collection requirements included in 10 CFR Part 54 are related to the license renewal application submittal and recordkeeping.

In the license renewal application submittal, the applicant: (1) identifies the appropriate systems, structures, and components (SSCs) that need to be managed for aging degradation, and (2) proposes additional actions needed to maintain the functionality of the SSCs in the period of extended operation. The current licensing basis (CLB) of a facility is modified to include programs and activities related to the aging management of SSCs through updates to the final safety analysis report (FSAR) and additional requirements added as part of the renewed operating license.

Applicants for renewal must identify which SSCs are within the scope of 10 CFR Part 54 (license renewal) and perform an integrated plant assessment to identify which of these in-scope SSCs require an aging management review. For each of these SSCs that require an aging management review, the applicant must demonstrate in its application that “the effects of aging will be adequately managed so that the intended function(s) will be maintained consistent with the CLB for the period of extended operation.” A license renewal applicant must also submit with its application an FSAR supplement that describes the aging management programs to be implemented, and inspection and testing activities to be completed, before and during the period of extended operation.

Licensees request renewal of their operating licenses in increments of 20 years. During the clearance period, the NRC expects to review applications for “initial” license renewal (renewal of the initial operating license, generally for the period between 40 and 60 years of operation) and applications for “subsequent” license renewal (the renewal of a previously renewed license, generally for the period between 60 and 80 years of operation). The regulations at 10 CFR Part 54 do not distinguish between initial license renewal and subsequent license renewal, and the bases for the information collection requirement are the same for both. Therefore, the term “license renewal” in this renewal request will refer to both initial license renewal and subsequent license renewal unless otherwise specified.

The NRC staff routinely includes a reporting requirement in renewed operating licenses requiring the licensee to notify the NRC in writing when the inspection and testing activities committed to in the application have been completed (“completion letter”).

The NRC staff anticipates that 3 applications for initial license renewal and 3 applications for subsequent license renewal will be submitted in accordance with 10 CFR Part 54 during the upcoming clearance period (November 2021 – October 2024). Currently there are 52 licensees

or recordkeepers maintaining 84 initial renewed operating licenses, and 2 licensees or recordkeepers maintaining 4 subsequent renewed licenses.

A. JUSTIFICATION

1. Need for and Practical Utility of the Collection of Information

The regulations in 10 CFR Part 54 establish license renewal requirements for operating nuclear power plants and describe the information that licensees must submit to the NRC when applying for a license renewal. The application must contain technical information regarding how the licensee will manage the detrimental effects of age-related degradation for certain plant SSCs to continue the plant's safe operation during the renewal term. The NRC needs this information to determine whether the applicant's actions will be effective in ensuring the plant's continued safe operation, and therefore whether the NRC may issue the renewed license.

The letter documenting the completion of inspection and testing activities required to be submitted by each holder of a renewed license serves as notification to the NRC that the licensee has completed the inspection and program implementation activities described in the FSAR supplement. The NRC needs this notification to verify through inspection the implementation of these activities.

Holders of renewed licenses must retain in an auditable and retrievable form, for the term of the renewed operating license, all information and documentation required to document compliance with 10 CFR Part 54.

The specific 10 CFR Part 54 subsections containing these information requirements can be found at the end of this supporting statement in "Description of Requirements."

2. Agency Use of the Information

The NRC will use the information submitted with the license renewal application to determine whether continued operation of nuclear power plants during their renewal terms will provide reasonable assurance of the adequate protection of public health and safety and the common defense and security. License renewal applicants and holders of renewed nuclear power plant operating licenses will use the information as a basis for establishing and maintaining aging management programs. Retained records will be used by the licensee and the NRC during inspections to provide the technical bases for continued safe operation of the plant.

3. Reduction of Burden Through Information Technology

There are no legal obstacles to reducing the burden associated with this information collection. The NRC encourages respondents to use information technology when it would be beneficial to them. The NRC has issued "Guidance

for Electronic Submissions to the NRC”¹ which provides direction for the electronic transmission and submittal of documents to the NRC. Electronic transmission and submittal of documents can be accomplished via the following means: the Electronic Information Exchange (EIE) process, which is available from the NRC's “Electronic Submittals” Web page; by Optical Storage Media (OSM) (e.g. CD-ROM, DVD); by facsimile; or by e-mail. It is estimated that approximately 100 percent of the potential responses, including license renewal applications and amendments, will be filed electronically. No hardcopy submissions are anticipated.

4. Effort to Identify Duplication and Use Similar Information

No sources of similar information are available. There is no duplication of requirements.

5. Effort to Reduce Small Business Burden

Not applicable.

6. Consequences to Federal Program or Policy Activities if the Collection is Not Conducted or is Conducted Less Frequently

An applicant is only required to report the information if it applies for license renewal. If the information collection is not conducted, the NRC staff will not have the information it needs to evaluate whether an applicant meets the requirements of 10 CFR Part 54 and the Atomic Energy Act, and therefore will not be able to issue the renewed license.

The frequency of the submission cannot be decreased. Initial license terms for power reactors are limited by law to a maximum of 40 years and initial license renewal applications are typically generated and submitted at least five years prior to expiration of the initial license to meet timely filing provisions. Licenses renewed in accordance with 10 CFR Part 54 have a maximum term of 20 years, and subsequent license renewal applications are typically generated and submitted at least five years prior to expiration of the initial renewed license.

The completion letter notifying the NRC of the completion of license renewal related activities is a one-time letter associated with the renewed license and therefore its frequency (once per renewal) cannot be reduced.

7. Circumstances That Justify Variation from OMB Guidelines

There are two 10 CFR Part 54 information collection requirements which vary from OMB guidelines:

- (1) Per 10 CFR 54.13(b), applicants must report to the NRC information they identify as having a “significant implication for public health and safety or

¹ <http://www.nrc.gov/site-help/electronic-sub-ref-mat.html>

common defense and security” within two working days. This reporting period is necessary so that the NRC is promptly informed of such matters. However, the NRC has not received a response to this information collection requirement during its past license renewal reviews and, therefore, estimates that no responses to 10 CFR 54.13(b) will be submitted during the clearance period.

- (2) Per 10 CFR 54.37, a licensee must retain records pertaining to compliance with the regulations in 10 CFR Part 54 throughout the term of a renewed license. This retention period is necessary to make sure data are available for establishing equipment aging trends for managing the detrimental effects of aging on the functionality of certain SSCs, and to maintain an acceptable level of public health and safety.

8. Consultations Outside the NRC

Opportunity for public comment on the information collection requirements for this clearance package will be published In the *Federal Register*.

9. Payment of Gift to Respondents

Not applicable.

10. Confidentiality of Information

Confidential and proprietary information is protected in accordance with NRC regulations at 10 CFR 9.17(a) and 10 CFR 2.390(b).

11. Justification for Sensitive Questions

Not applicable.

12. Estimated Industry Burden and Burden Hour Cost

During the clearance period, respondents will incur burdens for submitting applications and reports, and for recordkeeping. The NRC estimates that the paperwork burden may vary widely among nuclear power plant licensees. Each nuclear power plant is unique, and the programs employed by individual plants, while similar, are not identical. The NRC’s assumptions, methodology, and results for estimating the paperwork burdens follow.

Reporting Burden

There are three reporting burdens:

- (1) The first reporting burden covers all applicant efforts associated with preparing an initial license renewal application and submitting amendments to the application during the review process.

To calculate the annualized reporting burden, the NRC assigned all the hours associated with preparing and reviewing an application to the year in which an application is submitted. Licensees generally begin preparing their applications 24 to 30 months before submitting them, and the staff's review of an application spans approximately 18 months. Estimating only those hours expended for all in-house reviews during a particular clearance period would be onerous and prone to error and, with a relatively stable pace of applications in the pipeline, unnecessary. By including all hours associated with a single SLRA review in the year it was submitted, it effectively captures hours from reviews initiated during the previous clearance period that continue into this period, and removes the need for us to consider in future clearance requests activities that begin during this period and continue into those clearance periods. An exception to this is the completion letter, which is a discrete event and easily timed, and which has been included as a separate reporting burden in previous clearance extension requests. This burden is discussed in paragraph (3) below.

The NRC estimates that the average burden for preparing, submitting, and amending an initial license renewal application is 81,150 hours. This figure is based on continued interaction with stakeholders and information received from NRC's consultations with licensees during the prior renewal period. The review process requires an additional estimated 1,500 hours of burden for each application amendment required under 10 CFR 54.21(b) to identify changes to the facility's current licensing basis that materially affect the application, each year during the review process and at least three months before the scheduled completion of NRC's review.

The NRC expects to receive one new initial license renewal application per fiscal year during the clearance period (November 2021 through October 2024), and two amendments per application. The total annual burden for initial license renewal applications during the clearance period is therefore 84,150 hours (81,150 hours per application x 1 application annually, plus 1,500 hours per amendment letter x 2 amendments per application = 3,000 hours).

- (2) The second reporting burden covers all applicant efforts associated with preparing a subsequent license renewal application and submitting amendments to the application during the review process.

To calculate the annualized reporting burden, the NRC assigned all of the hours associated with preparing and reviewing an application, as well as generating and submitting the completion letter, to the year in which an application is submitted. Licensees generally begin preparing their applications 24 to 30 months before submitting them, and the staff's review of an application spans approximately 18 months. Estimating only those hours expended for all in-house reviews during a particular clearance period would be onerous and prone to error and, with a relatively stable pace of applications in the pipeline, unnecessary. By including all hours associated with a single SLRA review in the year it was

submitted, it effectively captures hours from reviews initiated during the previous clearance period that continue into this period, and removes the need for us to consider in future clearance requests activities that begin during this period and continue into those clearance periods. An exception to this is the completion letter, which is a discrete event and easily timed, and which has been included as a separate reporting burden in previous clearance extension requests. This burden is discussed in paragraph (3) below.

The NRC estimates that the average burden for preparing, submitting, and amending a subsequent license renewal application is 73,000 hours. This figure is based on an estimated ten-percent reduction in hours from initial license renewal estimates due to efficiencies incorporated into the NRC's guidance for subsequent license renewal, applicant familiarity with license renewal, and on existing license renewal programs and processes being already established at the plant from initial license renewal. The NRC will continue to interact with subsequent license renewal applicants to confirm and revise these estimates. The review process requires the same estimated 1,500 hours of burden as for initial license renewal for each application amendment required under 10 CFR 54.21(b) to identify changes to the facility's current licensing basis that materially affect the application, each year during the review process and at least three months before the scheduled completion of NRC's review.

The NRC expects to receive one new application per fiscal year during the clearance period (November 2021 through October 2024), and two amendments per application. The total annual burden for subsequent license renewal applications during the clearance period is therefore 76,000 hours (73,000 hours per application x 1 application annually, plus 2 amendments per application = 3,000 hours).

- (3) The NRC typically requires holders of renewed licenses to prepare and submit inspection and testing completion review letters. These respondents are different from those preparing and submitting initial and subsequent license renewal applications because these letters are typically submitted years after the NRC has granted their renewed licenses. The NRC allows licensees to submit one application to renew the operating licenses of more than one reactor unit at the same site. However, the NRC issues a separate renewed operating license to each reactor unit and each license contains the requirement to submit a letter documenting the completion of inspection and testing activities. Licensees may submit one letter for all of the units at a site or separate letters for each unit, depending on the dates the units enter the period of extended operation and the timing of the completion of activities associated with license renewal.

To estimate the number of completion letters that it will receive during the clearance period, the NRC assumed that a licensee will generate and submit the letter during the year before entering a unit's period of extended operation. Based on these assumptions, the NRC determined that licensees will likely submit these letters for 16 units during the

clearance period of November 2021 through October 2024. These plants are McGuire 2, Saint Lucie 2, Catawba 1 and 2, LaSalle 2, Columbia, Susquehanna 2, Callaway, Waterford 3, Limerick 1, Byron 1, Grand Gulf 1, Wolf Creek 1, Fermi 2, Palo Verde 1, and River Bend 1. However, one licensee will likely submit a single letter for Catawba Units 1 and 2 since they enter the period of extended operation on the same date, bringing the total number of information responses to 15 during the clearance period, for an average of 5 per fiscal year. The NRC estimates that each letter will incur a burden of 10 hours resulting in 50 hours/year (10 hours x 5 responses).

A summary of the calculations for reporting burden and cost is provided in Table 1.

Recordkeeping Burden

The annual recordkeeping burden covers all licensee efforts associated with retaining information to document compliance with 10 CFR Part 54 as required by 10 CFR 54.37. This burden begins when the NRC grants a renewed license and continues throughout the period of extended operation until the renewed license expires. Since an applicant for subsequent license renewal must maintain records related to both initial license renewal and subsequent license renewal while the application is being reviewed by the NRC staff, this 18-month review period of “double burden” is also included in the estimate here. This analysis already assumes that applicants for initial renewed licenses will be recordkeepers during the clearance period, this adjustment is not required to account for recordkeeping during initial license renewal application reviews.

During the clearance period, the total number of recordkeepers per year will generally increase as NRC receives more applications and issues more renewed licenses. To estimate the number of recordkeepers, the NRC considered each reactor site with renewed operating license(s) or an application for subsequent renewed operating license under review. Licensees typically submit combined license renewal applications for multi-unit sites, so the NRC issues the renewed license for each unit at the same time. The NRC estimates that the recordkeeping burden for a multi-unit site is approximately equivalent to the burden for a single unit site.

At the beginning of the clearance period, there will be 54 recordkeepers of 88 renewed licenses or applications for renewed licenses. Three of these recordkeepers (Turkey Point Units 3 and 4, Peach Bottom Units 2 and 3, and Surry Units 1 and 2) are holders of subsequently renewed licenses. During the clearance period, the NRC expects to review an application for, and may issue initial renewed licenses for Comanche Peak Units 1 and 2, adding one more recordkeeper for this multi-unit site and resulting in an average of 55 recordkeepers of 90 renewed licenses during the clearance period.

The NRC may issue subsequent renewed licenses to several applicants during the clearance period. Since these applicants are already counted as existing recordkeepers for the initial renewed licenses of these plants, issuance of their subsequent renewed licenses will have no effect on the total number of

recordkeepers. However, since applicants for subsequent license renewal must maintain records related to the initial renewed license as well as records supporting their application for subsequent renewed license while the NRC is reviewing it, this additional burden is included in this estimate.

Based on the outside consultations conducted during the 2015 renewal, licensees generally agreed with NRC's recordkeeping burden estimate of 1,000 hours per year which results in 55,000 hours (55 recordkeepers a year x 1,000 hours). The burden for subsequent license renewal applicants adds 18 months of recordkeeping per application received during the clearance period. The staff expects to begin review one new subsequent license renewal application per year during the clearance period, contributing an additional 1,500 hours (1 applicant recordkeeper per year x 1,000 hours/year x 1.5 years). A summary of these calculations is provided in Table 2.

Total burden

The total burden for the Part 54 information collections during the clearance period is 216,700 hours (160,200 reporting hours + 56,500 recordkeeping hours) at a cost of \$60M (216,700 hours x \$279/hr).

The \$279 hourly rate used in the burden estimates is based on the Nuclear Regulatory Commission's fee for hourly rates as noted in 10 CFR 170.20 "Average cost per professional staff-hour." For more information on the basis of this rate, see the Revision of Fee Schedules; Fee Recovery for Fiscal Year 2020 (85 FR 37250, June 19, 2020).

13. Estimate of Other Additional Costs

The quantity of records to be maintained is roughly proportional to the recordkeeping burden. Based on the number of pages maintained for a typical clearance period, the records storage cost has been determined to be equal to 0.0004 times the recordkeeping burden cost. Therefore, the storage cost for this clearance is estimated to be \$6,305 (56,500 hours x \$279/hour x 0.0004).

14. Estimated Annualized Cost to the Federal Government

The staff has developed estimates of annualized costs to the Federal Government related to the conduct of this collection of information. These estimates are based on staff experience and subject matter expertise and include the burden needed to review, analyze, and process the collected information and any relevant operational expenses. The estimated annualized cost to the NRC for 10 CFR Part 54 information collections covers the review of information in each submitted license renewal application.

The NRC staff anticipates that initial license renewal applications will be based on the guidance for subsequent license renewal (which is permitted), and the estimated hours for completing an initial license renewal application review and a subsequent license renewal application will be comparable. Additionally, the NRC staff has enacted several efficiency improvements based on lessons learned from past application reviews, resulting in an approximately 10-percent

reduction in the total hours budget for both initial and subsequent license renewal application reviews. Based on these factors, the NRC plans to expend approximately 15,850 hours for each application review. The NRC rate is \$279/hour. Therefore, the resulting cost per initial or subsequent license renewal application is estimated to be \$4.4M.

As described in Item 12 above, the NRC expects to begin review of two license renewal applications (one initial license renewal application and one subsequent license renewal application) per year during the clearance period. Therefore, the estimated annualized cost to the Federal government is \$8.8M per year (\$4.4M per application x 2 applications per year).

15. Reasons for Changes in Burden or Cost

The overall burden for the Part 54 information collections decreased from 226,320 hours to 216,700 hours, a decrease of 9,620 hours. The change in burden is due to a significant (10%) reduction in the number of hours for subsequent license renewal application reviews, only slightly offset by a small increase in the anticipated number of letters of completion and the number of recordkeepers.

The overall cost for information collections increased slightly, by \$427,640, despite the overall decrease in burden, because the fee rate increased significantly from \$263 per hour to \$279 per hour.

Reporting Burden

The reporting burden has decreased by 8,120 hours, from 168,320 to 160,200 hours, because of the lower estimated burden for subsequent license renewal applications. The reporting burden per initial license renewal application remains unchanged at 84,150 hours reporting (81,150 hours for the application and 1,500 hours each for two amendments), but these initial license renewal applications comprise only half of the total expected applications. Subsequent license renewal applications make up the other half, and the estimated reporting burden for these is 8,150 hours less than the burden for initial license renewal applications. The number of completion letters increased from two per year to five per year, an increase of 30 hours per year.

Recordkeeping Burden

Although the recordkeeping burden (1,000 hours per application) estimate did not change in this submission, the number of recordkeepers decreased from the estimated 58 recordkeepers to an average of 55 recordkeepers, resulting in a decrease of 1,500 hours of burden annually (from 58,000 hours to 56,500 hours). The previous estimate assumed that four new recordkeepers would be added due to renewed licenses being issued during the term. While four licenses were renewed, only two of these were initial license renewals. The other two were subsequent license renewals, which do not add to the recordkeeping burden because the recordholders were already subject to the burden based on their initial license renewals. The previous estimate also included an estimate that six new applications would be received during the clearance period, and the NRC

did not receive any initial license renewal submissions (only subsequent license renewal applications).

16. Publication for Statistical Use

This information will not be published for statistical use.

17. Reason for Not Displaying the Expiration Date

The recordkeeping and reporting requirements for this information collection are associated with regulations and are not submitted on instruments such as forms or surveys. For this reason, there are no data instruments on which to display an OMB expiration date. Further, amending the regulatory text of the CFR to display information that, in an annual publication, could become obsolete would be unduly burdensome and too difficult to keep current.

18. Exceptions to the Certification Statement

There are no exceptions.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

Statistical methods are not used in this collection of information.

TABLE 1
ANNUAL REPORTING BURDEN

Section	Number of Respondents	Responses per Respondent	Total Responses	Burden per Response (Hours)	Total Annual Burden (Hours)	Cost at \$279/ hour (\$)
Initial License Renewal Application (54.13, 54.15, 54.17, 54.19, 54.21, 54.22)	1	1	1	81,150	81,150	\$22,640,850
Subsequent License Renewal Application (54.13, 54.15, 54.17, 54.19, 54.21, 54.22)	1	1	1	73,000	73,000	\$20,367,000
Amendments to Application	2	2	4	1,500	6,000	\$1,674,000
Completion Letter	5	1	5	10	50	\$13,950
Total	9	--	11	--	160,200	\$44,695,800

TABLE 2
ANNUAL RECORDKEEPING REQUIREMENTS

Section	Number of Recordkeepers	Burden per Recordkeeper (Hours)	Total Annual Burden (Hours)	Cost at \$279/ hour (\$)
Retention of Records in an Auditable and Retrievable Form and FSAR Updates (54.37)	55	1,000	55,000	\$15,345,000
Retention of records during review of subsequent license renewal application	1	1,500	1,500	\$418,500

TOTAL ANNUAL BURDEN / COST: 216,700 hours (160,200 hours reporting plus 56,500 hours recordkeeping) / \$60,459,300

TOTAL ANNUAL RESPONDENTS: 62 (1 initial license renewal application + 1 subsequent license renewal application + 5 completion letters + 55 recordkeepers)

TOTAL ANNUAL RESPONSES: 66 (1 initial license renewal application + 1 subsequent license renewal application + 4 amendments + 5 completion letters + 55 recordkeepers)

DESCRIPTION OF INFORMATION COLLECTION REQUIREMENTS
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Section 54.13 states information completeness and accuracy requirements. Specifically, Paragraph (b) requires each applicant to notify the Commission of information identified by the applicant as having, for the regulated activity, significant implication for public health and safety or the common defense and security. Such notification must be made within two working days of identifying the information. The NRC needs this information so that it may take appropriate actions, as required, to protect the public's health and safety. Applicants will report this information as necessary to comply with the regulation.

Section 54.15 permits the NRC, in accordance with 10 CFR 50.12, to grant exemptions from 10 CFR Part 54 requirements. The Commission, upon application by any interested person or upon its own initiative, may grant the exemptions. The NRC requires the information so that it can determine whether an exemption is warranted.

Section 54.17 states requirements for renewal application filing:

Paragraph (a) requires the filing to be in accordance with Subpart A of 10 CFR Part 2 and 10 CFR 50.4 and 50.30. This section establishes the procedural aspects for the filing whereas 10 CFR 54.19, 54.21, 54.22, and 54.23 address information to be included in the application, as described below.

Paragraph (g) requires the license renewal applicant to agree in writing that it will not permit any individual access to Restricted Data or classified National Security Information until an investigation has been approved for such access under the provisions of 10 CFR Parts 25 and/or 95. This information is necessary to assist the Commission in determining that permitting such person's access to Restricted Data or classified National Security Information will not endanger the common defense and security. OMB Clearance Nos. 3150-0046, 3150-0050, 3206-0007, 3150-0026, 3150-0049, 3150-0051 cover information collection for 10 CFR Part 25, and OMB Clearance No. 3150-0047 covers information collection for 10 CFR Part 95. An applicant will report this information once per renewal application submission.

Section 54.19 states the general information required in the application:

Paragraph (a) requires license renewal applicants to provide the information specified in 10 CFR 50.33(a) through (e), (h), and (i); the application may incorporate this information by reference. The NRC needs this information to establish the continued validity, during the renewal term, of general information applicable during the original license. An applicant will report this information once per renewal application submission.

Paragraph (b) requires each renewal application to include conforming changes to the standard indemnity agreement in 10 CFR 140.92, Appendix B. This information is necessary to account

for the expiration term of the proposed renewed license. An applicant will report this information once per renewal application submission.

Section 54.21 states requirements for the application's technical information:

Paragraph (a) requires an integrated plant assessment to identify and list those SSCs subject to an aging management review. The integrated plant assessment must describe and justify the methods used to identify those SSCs. The NRC needs this information to be able to conclude that additional aging management attention is directed to SSCs that require it because they are important and can undergo age-related degradation during the renewal term. The integrated plant assessment must also demonstrate the adequacy of actions taken or to be taken to manage the detrimental effects of aging. The NRC needs this information to be satisfied that the actions will be effective in assuring the continued safe operation of the plant. An applicant will report this information once per renewal application submission.

Paragraph (b) requires the application to contain CLB changes which occur during NRC review of the application. Each year following submittal of the license renewal application and at least three months before scheduled completion of the NRC review, the applicant must submit an amendment to the renewal application that identifies any change to the facility's CLB that materially affects the contents of the license renewal application, including the UFSAR supplement. The NRC needs this information to determine the acceptability of these changes from the pertinent safety standpoints. An applicant will report this information as necessary while NRC completes its review of the application.

Paragraph (c) requires the application to contain an evaluation of time-limited aging analyses (TLAAs) for SSCs. The applicant must list the TLAAs that conform to the definition in 10 CFR 54.3 and demonstrate that the analyses remain valid for the period of extended operation, the analyses have been projected to the end of the period of extended operation, or the effects of aging on the intended function(s) will be adequately managed for the period of extended operation. The NRC needs this information to determine whether those SSCs meet the requirements for license renewal. This section also requires a list of all plant-specific exemptions granted pursuant to 10 CFR 50.12 and in effect that are based on TLAAs as defined in 10 CFR 54.3. The applicant must provide an evaluation that justifies the continuation of these exemptions for the period of extended operation. The NRC needs this information to justify whether to continue these exemptions. An applicant will report this information once per renewal application submission.

Paragraph (d) requires the application to include an UFSAR supplement for the facility which must contain a summary description of the programs and activities for managing the effects of aging and the evaluation of TLAAs for the period of extended operation as determined by 10 CFR 54.21(a) and (c), respectively. The NRC needs this information to determine whether the licensee's actions for managing the effects of aging provide reasonable assurance that the facility's operations during the period of extended operation can be conducted without endangering public health and safety. An applicant will report this information once per renewal application submission.

Section 54.22 requires the application to include any technical specification changes or additions necessary to manage the effects of aging during the period of extended operation. The justification for these changes or additions must also be contained in the application. The NRC needs this information to determine the acceptability of these changes from pertinent

safety standpoints. An applicant will report this information once per renewal application submission.

Section 54.23 states the environmental information required in the application. This information is required to be a supplement to the environmental report that complies with 10 CFR Part 51, "Environmental Protection Regulations for Domestic Licensing and Related Regulatory Functions," Subpart A, "National Environmental Policy Act – Regulations Implementing Section 102(2)." The NRC requires this information to determine the acceptability of the environmental consequences of the facility's continued operation during the renewal term. OMB Clearance No. 3150-0021 covers the burden for this environmental information collection. An applicant will report this information once per renewal application submission.

Section 54.33 states license renewal conditions. Specifically, Paragraph (c) requires each renewal license to include those conditions to protect the environment that were imposed pursuant to 10 CFR 50.36(b) and that are part of the facility's CLB at the time the NRC issues the renewed license. The NRC requires this information to protect the environment during the term of the renewed license. OMB Clearance No. 3150-0011 covers information collection for 10 CFR 50.36(b), and OMB Clearance No. 3150-0021 covers the burden for this environmental information collection as it relates to license renewal.

Section 54.37 states additional records and record keeping requirements:

Paragraph (a) requires holders of renewed licenses to retain in an auditable and retrievable form, for the term of the renewed operating license, all information and documentation required to document compliance with 10 CFR Part 54. The NRC needs access to this information for continuing effective regulatory oversight.

Paragraph (b) requires licensees, after the NRC issues the renewed license, to include in the UFSAR update required by 10 CFR 50.71(e), any newly identified SSCs that would have been subject to an aging management review or evaluation of TLAAs in accordance with 10 CFR 54.21. This UFSAR update must describe how the effects of aging will be managed such that the intended function(s) will be effectively maintained during the period of extended operation. The UFSAR update contains information on all of the changes made by the licensee to the plant since submission of the original UFSAR or, as appropriate, since submission of the last UFSAR. The NRC needs access to this information for continuing effective regulatory oversight. Renewed license holders will report this information as necessary to comply with the regulation.

GUIDANCE DOCUMENTS FOR INFORMATION COLLECTION REQUIREMENTS
CONTAINED IN

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Title	Accession number
NRC Regulatory Guide 1.188, Revision 1, "Standard Format and Content for Applications to Renew Nuclear Power Plant Operating Licenses"	ML051920430
NUREG-1800, Revision 2, "Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants"	ML103490036
NUREG-1801, Revision 2 "Generic Aging Lessons Learned (GALL)" Report	ML103490041
NUREG-2191 Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report Vol. 1 & 2	Vol. 1 ML17187A031 Vol. 2 ML17187A204
NUREG-2192 Standard Review Plan for Review of Subsequent License Renewal Applications for Nuclear Power Plants	ML17188A158