



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

June 29, 2022

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

FROM: Emmanuel Sayoc, Project Manager */RA/*
License Renewal Projects Branch
Division of New and Renewed Licenses
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF JUNE 1, 2022, PUBLIC MEETING WITH
INDUSTRY ON SUBSEQUENT LICENSE RENEWAL GUIDANCE
DOCUMENT UPDATES

On June 1, 2021, the U.S. Nuclear Regulatory Commission (NRC) staff held an information public meeting at the NRC Headquarters in Rockville, Maryland to discuss the Subsequent License Renewal (SLR) guidance document updates project. The staff presented on the project overview, process, milestones, and other project specifics. The meeting notice and agenda, as well as the staff's presentation slides and guidance document summarized proposals are publicly available on the Agencywide Documents Access and Management System (ADAMS) Accession No. ML22147A052 and ML22147A033, respectively. The enclosure lists the meeting attendees.

The following summarizes discussions during the meeting:

- NRC management emphasized the importance of transparency and interaction with the public.
- NEI initiated risk informed based updates to AMP XI.M33 "Selective Leaching" and XI.E3 "Inaccessible Power Cables Not Subject to 10 CFR 50.49 Environmental Qualification Requirements." NRC may consider risk informed based updates to other AMPs, if there is interest, separately from the current SLR guidance document update effort. In the meantime, the staff is open to reviewing program exceptions, enhancements, and application of operating experience (OpE) related to risk insights.
- OpE is usually used to expand guidance in the GALL, however it is possible for the NRC to relax guidance based on OpE as well. For example, the staff's review of EPRI report MRP-227, Rev 2 "Materials Reliability Program: Pressurized Water Reactor Internals Inspection and Evaluation Guidelines" related to the AMP XI.M16A "PWR Vessel Internals" may result in a relaxation or reduction in inspection categories, criteria, and frequencies based on relevant OpE risk insights. Issued Interim Staff Guidance, SLR-ISG-2021-01-PWRVI, incorporated a gap analysis and brought the program up to 80 years of plant operation.

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- Per NEI the application of cross cutting corrective action programs, not just in AMP XI.M33 “Selective Leaching,” may pose opportunities to reduce prescriptive procedures and relax completions schedules.
- Often OpE is negative in terms of degradation or failure of systems, structures, and components, however NRC is also interested in positive OpE such as programs and aging management successfully combatting aging effects. Per NEI, some upcoming risk informed insights are expected to be positive in nature.
- The SLR Guidance update process will include at least one public meeting to discuss proposed updates. The staff invited the public to provide items of interest for future public meeting. Those items are to be provided to the project managers Emmanuel Sayoc and Jessica Hammock.
- Items of interest for future public meeting discussions provided during the meeting include fire protection, structural monitoring (particularly wooden poles), sprinkler head life extension; risk insights across AMPs, positive feedback from industry, further evaluation on aging management of pressurized water reactor vessel internals and MRP 227, and revisions to AMP XI.M41 “Buried and Underground Piping and Tanks.”
- Built into the SLR Guidance update process is a formal solicitation of comments on the staff’s draft guidance during a 60-day comment period, and at least one public meeting during that period. The public is also invited to attend the Advisory Committee on Reactor Safeguards subcommittee and full committee meetings.
- Industry suggested that staff provide a level of significance rating, or more information to SLR guidance document proposed updates, to allow the industry to more effectively commit resources to the most impactful updates. The staff will look at ways to accommodate the suggestion.
- EPRI is planning on providing recommended revisions to AMP XI.M41 “Buried and Underground Piping and Tanks,” and technical basis to be discussed at the next public meeting.
- The staff reiterated that license renewal and subsequent license renewal applications submitted during the SLR guidance document update effort will be held only to approved and final guidance and interim staff guidance. Applicants are welcome to include draft guidance such as those from the SLR guidance document update via program enhancements and exceptions or application of OpE and risk insights.
- Standard scoping and screening process for complex assemblies apply.

Enclosure:

As stated

cc w/encl: See next page

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 SUBSEQUENT LICENSE RENEWAL GUIDANCE DOCUMENT UPDATES
 DATED: JUNE 29, 2022

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| OFFICE | NRR/DNRL/NLRP/PM | NRR/DNRL/NRLB/LA | NRR/DNRL/NLRP/BC |
| NAME | ESayoc* | YEdmonds* | LGibson* |
| DATE | 6/08/22 | 6/14/22 | 6/29/22 |
| OFFICE | NRR/DNRL/NLRP/PM | | |
| NAME | ESayoc* | | |
| DATE | 6/29/22 | | |

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List of Attendees

U. S. Nuclear Regulatory Commission Attendees:

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|----------------------|-------------------|
| Bernie Thomson | Matthew Domke |
| Lauren Gibson | Amy Hull |
| Angela Buford | Joel Jenkins |
| Emmanuel Sayoc | Michelle Kichline |
| Jessica Hammock | Paul Klein |
| Brian Harris | Bryce Lehman |
| Allen Hiser | Lisa London |
| Matthew Hiser | Matthew McConnell |
| Christopher Tyree | Seung Min |
| Marieliz Johnson | Carol Moyer |
| Brian Allik | William Orders |
| James Medoff | Eric Palmer |
| William Gardner | Andrew Prinaris |
| Gregory Makar | Liliana Ramadan |
| Carolyn Fairbanks | Bill Rogers |
| Bart Fu | David Rudland |
| Andy Johnson | Madhumita Sircar |
| Lydiana Alvarado | Brian Harris |
| Ata Istar | Nicholas Taylor |
| Michael Benson | Leslie Terry |
| Steven Bloom | George Thomas |
| John Bozga | Vaughn Thomas |
| Jorge Cintron-Rivera | Robert Tregoning |
| Joseph Colaccino | Christopher Tyree |
| Diana Diaz Toro | George Wang |
| David Dijamco | Angela Wu |
| Mel Gray | Steve Wyman |
| Emma Haywood | On Yee |
| | Mark Yoo |

U.S. Senate, Environmental and Public Works Attendees:

Matthew Marzano
Andrew Zach

Industry/Public Attendees:

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|--|--------------------------------|
| Bob Kalinowski | AEP Energy |
| Boris B Bolf | AEP Energy |
| Andrew J Burgess | Ameren |
| Jana Bergman | Curtiss Wright |
| Craig H Heah | Dominion Energy |
| Jeffrey Lackovic | Dominion Energy |
| Jonathan L Bussells | Dominion Energy |
| Keith J Miller | Dominion Energy |
| Paul Aitken | Dominion Energy |
| Rucker Roger | Dominion Energy |
| Steven N Graham | Duke Energy |
| Lori W Hekking | Duke Energy |
| Daniel William Roberts | Duke Energy |
| Jason Matthew Sisk | Duke Energy |
| Francesco A. Viola | Duke Energy |
| Cox Alan | Entergy |
| Abel Amy | Enercon |
| Brian Norman | Enercon |
| Burns Cunningham | Enercon |
| Ian Miller | Enercon |
| Jeff Gromatzky | Enercon |
| Latoya Bennett | Enercon |
| Mitch McFarland | Enercon |
| <u>Electric Power Research Institute (EPRI)</u> | |
| Jessica Bock | EPRI |
| Luke Breon | EPRI |
| Dylan Cimock | EPRI |
| Andrew Mantey | EPRI |
| <u>Exelon Generation Company (Exelon)</u> | |
| James H Annett | Exelon |
| Matthew Chouinard | Exelon |
| John Hilditch | Exelon |
| Casey A Muggleston | Exelon |
| Mathew Rice | Exelon |
| Brittany Sprung | Exelon |
| Barry M Thurston | Exelon |
| Christopher D Wilson | Exelon |
| Timothy Adams | Jensen Hughes |
| Amit Kalia | Luminant |
| Taylor Smith | Luminant |
| Russ L. Wenzl | Nebraska Public Power District |
| <u>Nuclear Energy Institute (NEI)</u> | |
| Brett Titus | NEI |
| Emma Wong | NEI |
| Andrew Mauer | NEI |
| <u>Oak Ridge National Laboratory (ORNL)</u> | |
| T. M. Rosseel | ORNL |
| Mikhail A. Sokolov | ORNL |

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|--------------------------|---|
| Cotasha Wilson Blackburn | Southern Co |
| Brandon Kenneth | Southern Co |
| Rafael Gonzales | South Texas Project Nuclear Operating Company |
| Terry Herrmann | Structural Integrity Associates |
| Russell E Day | Talenenergy |

Tennessee Valley Authority (TVA)

| | |
|---------------------|--------------|
| William J Baker | TVA |
| Jonathan Delaune | TVA |
| Peter John Donahue | TVA |
| Daniel Green | TVA |
| Dominick Edgar | TVA |
| Eric Ashley Michael | TVA |
| John T. Ahearn | Westinghouse |
| David C. DiBasilio | Westinghouse |
| Matthew Golliet | Westinghouse |
| Gregory Imbrogno | Westinghouse |
| Benjamin Mays | Westinghouse |
| Joshua K. McKinley | Westinghouse |
| Derek Simpson | Westinghouse |
| Anees Udyawar | Westinghouse |
| Toutseng Hawj | XCEL Energy |
| Stephen E Sollom | XCEL Energy |
| Garcia Alonso | Public |
| Andrew Z | Public |
| Jim Melchionna | Public |
| John Pfabe | Public |
| Julia Boeyink | Public |
| Kevin Lepson | Public |
| Mark Bensi | Public |
| Ryan Wolfe | Public |
| Steve Dort | Public |
| Steve Kenefick | Public |