



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

December 23, 2024

MEMORANDUM TO: Brian K. Harris, Acting Chief
Licensing Renewal Projects Branch
Division of New and Renewed Licenses
Office of Nuclear Reactor Regulation

FROM: Angela Wu, Senior Project Manager */RA/*
Licensing Renewal Projects Branch
Division of New and Renewed Licenses
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE DECEMBER 3, 2024, PUBLIC MEETING TO
DISCUSS POSSIBLE EFFICIENCIES ON THE SUBSEQUENT
LICENSE RENEWAL REVIEW

On December 3, 2024, the U.S. Nuclear Regulatory Commission (NRC) staff held an information meeting with the Nuclear Energy Institute (NEI) on possible efficiencies on the subsequent license renewal (SLR) review. The public meeting notice is located at Agencywide Documents Access and Management Systems (ADAMS) Accession No. ML24337A133. The agenda and list of meeting attendees are included as in Enclosures 1 and 2 of this meeting summary, respectively.

SUMMARY:

As a follow-up from the September 5, 2024, meeting (ML24260A002), the purpose of this meeting was for the NRC staff to further discuss efficiency opportunities for the SLR review process with NEI, industry, and members of the public. The NRC staff's presentation (ML24337A102) highlighted the following topics: Staff Requirements Memorandum (SRM) COMCTH-24-0003, "License Renewal and Subsequent License Renewal Review Expectations," dated August 8, 2024 (ML24221A320), staggering of future submittals, and updates to the efficiency efforts related to the safety and environmental reviews.

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Environmental Review

License Renewal Roadmap – Environmental Updates

On June 26, 2024, the NRC staff published the License Renewal Roadmap Dashboard to provide updates on the progress of the License Renewal Roadmap, as detailed in SECY-24-0026, “Achieving Timely Completion of License Renewal Safety and Environmental Reviews (License Renewal Roadmap)” (ML24059A131). The License Renewal Roadmap Dashboard is available on the NRC public website here: <https://www.nrc.gov/reactors/operating/licensing/renewal/roadmap.html>.

The staff provided an update to its environmental review efficiency efforts, starting off with an update on its work related to SECY-24-0046, “Implementation of Fiscal Responsibility Act of 2023 National Environmental Policy Act Amendments,” May 2024 (ML24078A013). To date, the staff is awaiting NRC Commission decision.

In June 2024, the staff developed the framework to consider environmental assessments, which was piloted with the Dresden Nuclear Power Station, Units 2 and 3 (Dresden) SLR review in July 2024. It was decided to not conduct an environmental assessment for this review and conduct an environmental impact statement. More recently, the staff has developed a new working group to develop guidance and institutionalize the framework of an environmental assessment.

In response to the staff’s question on whether there is an appetite for engagements on environmental assessments, NEI expressed interest in learning more about the framework, criteria, and risks related to an environmental assessment. Additionally, the industry would be interested in conducting a pilot, as well as additional discussions on the topic in future meetings. The staff noted this interest and will arrange additional communications in future public meetings.

As part of the 2024 Accelerating Deployment of Versatile Advanced Nuclear for Clean Energy (ADVANCE) Act, the NRC staff will be issuing a report to Congress on its efforts to facilitate efficient, timely, and predictable environmental reviews for nuclear reactor applications for a license under Atomic Energy Act Section 103 in January 2025.

SRM-COMCTH-24-0003, “License Renewal and Subsequent License Renewal Review Expectations”

The staff provided an update on its activities related to meeting SRM-COMCTH-24-0003.

- Starting with new applications received after August 2024, the staff will begin completing initial license renewal (LR) and SLR reviews in no more than 14,000 staff hours and no more than 18 months, assuming a high-quality application submittal, and timely responses from the applicant to requests for additional or confirmatory information. New applications will also target a 30-day acceptance review.

The staff is currently implementing the License Renewal Roadmap, as well as new initiatives, to meet the new metrics. Additionally, the staff is exploring opportunities to shorten the acceptance review from the current target of 45 days to the new 30-day

target. In response to this activity, NEI noted that it believes the 30-day acceptance review is achievable, especially by applying the NRC's BeRISKSmart framework.

For current applications, the staff will re-evaluate, and to the greatest efforts, adjust schedules to meet the new metrics. The staff has reduced hours for two reviews to account for the realized efficiencies as well as the new update to NUREG-1437, "Generic Environmental Impact Statement for License Renewal of Nuclear Plants" (LR GEIS) (ML24137A164).

- The staff will continue applying process improvements and lessons learned through the ongoing implementation of the License Renewal Roadmap.
- Through bi-monthly public meetings, the staff continues to engage the industry regarding the timing of applications – a topic of discussion at this public meeting.
- The staff will also afford credit of operational programs for the safety review with the implementation of the Tiered Approach, currently being piloted on the Clinton Power Station, Unit 1 (Clinton) LR and Dresden SLR.
- The staff is conducting a business process improvement exercise to identify and implement additional efficiencies. In response to NEI's inquiry for additional information on the business improvement exercise, the staff shared that the exercise is a larger agency effort that includes the analysis and improvement of the LR process. More information will be available in the future as the effort is underway.
- The staff continues to report to the Commission on the progress and metrics related to LR/SLR reviews. The industry questioned to what extent are the metrics being tracked, as well as details regarding the benefits that yield from each of the staff's efficiency efforts. To clarify, the staff explained that metrics are tracked monthly, not simply at the end of each review, in order to properly forecast and mitigate risk in real time. However, it is challenging to provide exact data on the gains of specific efficiency efforts as the benefits of the efficiency efforts are holistic, not piece-meal.

Safety Review

License Renewal Roadmap – Safety Updates

For the safety review, the staff continues to implement the Tiered Approach to the technical review. Phase 3 of the safety review's three-phase efficiency approach, "Additional Process Improvements," will be completed before the receipt of the next SLR, expected next year between April to June 2025. This entails the restructuring audits and streamlining documentation.

Additionally, the staff is working to issue the next revisions to NUREG-2191, "Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR)," and NUREG-2192, "Standard Review Plan for Review of Subsequent License Renewal Applications for Nuclear Power Plants" (SRP-SLR). To aid in the industry's development of high-quality applications, the staff will issue a draft of the GALL-SLR Report, Revision 1, in December 2024.

The Tiered Approach

The staff continues to pilot the Tiered Approach to the Dresden SLR and Clinton LR reviews, with continuous training throughout the technical review. Each month, the staff receives feedback from the technical staff on the experience of applying the new Tiered Approach. The feedback will aid the NRC in refining the Tiered Approach to apply best practices and lessons learned to future reviews.

During the public meeting, the industry noted instances where the staff would request for additional information to be provided on the electronic portal during its audit. The industry sought understanding on why additional information was requested, if the tier of the particular technical review area was “confirmation.” The staff clarified that while the Tiered Approach categorizes each aging management program in a particular tier at the start of the review, the staff continues to do their due diligence in completing their review to achieve its safety determination. At times, this may mean that additional information is required.

Requesting Feedback: Standardization of Application Recommendations

As described in the License Renewal Roadmap’s safety review’s three-phased approach, the NRC staff’s internal tool, the Technical Review Package (TRP) Tool is being modernized to automatically read PDF applications. Standardizing tables, application changes, and nomenclature allows for automatic processing of the submittal to reduce manual efforts and staff hours, while improving accuracy and efficiency.

At the July 9, 2024, public meeting, the NRC staff walked through the “Standardization Recommendations for License Renewal Applications – DRAFT” (ML24184C131), and answered numerous questions regarding the standardization (ML24204A269). At this meeting, the industry requested a separate meeting to discuss the standardization in greater detail and provide feedback. The NRC will schedule a separate public meeting to gather additional feedback.

Requesting Feedback: Staggering Future Submittals

In the License Renewal Roadmap, the staff proposed a recommendation to stagger applications at one application every three months. The staff’s analysis showed that it was the optimal conditions to maximize the efficiency of reviews.

At this meeting, the NEI noted that the discussions between the industry and NRC have been productive regarding the timing of the two applications expected in 2025. As 2026 approaches, NEI will continue to survey the industry to determine the best timing for the submission of applications to the NRC.

The NRC staff plans to hold its next public meeting on SLR efficiencies in February 2025.

Enclosures:

1. Meeting Agenda
2. List of Attendees

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 REVIEW
 DATED: DECEMBER 23, 2024

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ADAMS Accession No.: ML24361A083***via email****NRR-106**

OFFICE	NRR/DNLR/NLRP: PM	NRR/DNRL/NLIB: LA	NRR/DNRL/NLRP: BC (A)	NRR/DNLR/NLRP: PM
NAME	AWu*	KBratcher*	BHarris* (MYoo for)	AWu*
DATE	12/18/2024	12/19/2024	12/23/2024	12/23/2024

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**U.S. NUCLEAR REGULATORY COMMISSION (NRC) SUMMARY OF THE
DECEMBER 3, 2024, PUBLIC MEETING TO DISCUSS POSSIBLE EFFICIENCIES ON THE
SUBSEQUENT LICENSE RENEWAL REVIEW**

Meeting Agenda

<u>Time</u>	<u>Topic</u>	<u>Organization</u>
1:00 p.m. - 1:15 p.m.	Introductions	All
1:15 p.m. - 2:15 p.m.	Discussion	U.S. Nuclear Regulatory Commission (NRC) and Nuclear Energy Institute
2:15 p.m. - 2:30 p.m.	Opportunity for public comments	NRC and Public
2:30 p.m.	Adjourn	All

**U.S. NUCLEAR REGULATORY COMMISSION SUMMARY OF THE DECEMBER 3, 2024,
PUBLIC MEETING TO DISCUSS POSSIBLE EFFICIENCIES ON THE SUBSEQUENT
LICENSE RENEWAL REVIEW**

List of Attendees

Name	Affiliation
Ali Rezai	U.S. Nuclear Regulatory Commission (NRC)
Alysia Bone	NRC
Andy Johnson	NRC
Andy Patz	NRC
Angela Sabet	NRC
Angela Wu	NRC
Angie Buford	NRC
Ashley Waldron	NRC
Ava Falgie	NRC
Bill Rogers	NRC
Billy Gleaves	NRC
Brian Harris NRR	NRC
Brian Taylor	NRC
Carol Moyer	NRC
Carolyn Fairbanks	NRC
Charles Kreuzberger	NRC
Chris Tyree	NRC
Cory Parker	NRC
David Dijamco	NRC
David Rudland	NRC
Derek Scully	NRC
Emma Haywood	NRC
Eric Palmer	NRC
Eric Reichelt	NRC
Getachew Tesfaye	NRC
Greg Makar	NRC
Henry Wagage	NRC
James Gavula	NRC
Jason Paige	NRC
Jay Collins	NRC
Jessica Hammock	NRC
Jessie Quintero	NRC
Joel Jenkins	NRC
John Tsao	NRC
Jordan Glisan	NRC
Karen Loomis	NRC
Karen Sida	NRC
Kenn Miller	NRC
Kevin Folk	NRC
Kim Conway	NRC
Lance Rakovan	NRC
Lauren Gibson	NRC

Leah Parks	NRC
Liliana Ramadan	NRC
Lydiana Alvarado	NRC
Manny Sayoc	NRC
Marieliz Johnson	NRC
Mark Yoo	NRC
Matthew Mitchell	NRC
Michael Benson	NRC
Michele Sampson	NRC
Michelle Kichline	NRC
Miranda Ross	NRC
Naeem Iqbal	NRC
Omar Khan	NRC
On Yee	NRC
Paul Klein	NRC
Peter Lom	NRC
Reena Boruk	NRC
Reinaldo Rodriguez	NRC
River Rohrman	NRC
Robert Davis	NRC
Samuel Lee	NRC
Seung Min	NRC
Steve Koenick	NRC
Steven Levitus	NRC
Ted Smith	NRC
Varoujan Kalikian	NRC
Andrew Mauer	Nuclear Energy Institute (NEI)
Brett Titus	NEI
Andrew J. Burgess	Ameren
Rigel Davis	Ameren
Andrew Smolensky	American Electric Power Service Corporation (AEPSC)
Dave Sudhoff	AEPSC
Randy Keppeler	AEPSC
Ryan Wasielewski	AEPSC
Allison C. Stalker	Constellation Nuclear
Casey Muggleston	Constellation Nuclear
Christopher D. Wilson	Constellation Nuclear
Hannah E. Pell	Constellation Nuclear
Iba Ello Fletcher	Constellation Nuclear
John Hilditch	Constellation Nuclear
Ketan Patel	Constellation Nuclear
Kristin C. Meek	Constellation Nuclear
Kurt R. Lindeman	Constellation Nuclear
Scott L. Kauffman	Constellation Nuclear
William H. Ford, Jr.	Constellation Nuclear
Keith J. Miller	Dominion Energy
Pratt Cherry	Dominion Energy
Chris Saville	Duke Energy

Heather Galloway	Duke Energy
Paul F. Guill	Duke Energy
Sofia Bouhrizi	Electricite de France (EDF)
Aaron Halstrom	ENERCON
Gary Adkins	ENERCON
Jeff Gromatzky	ENERCON
Jeffrey Head	ENERCON
Latoya Bennett	ENERCON
Min Noh	ENERCON
Russell Day	ENERCON
Tristen Hunnewell	ENERCON
Richard J. Rogalski	Energy Northwest
Tina Morton	Entergy
Michael Gallagher	Exelon
Annessa Lippincott	GSE Solutions
Todd Evans	Luminant
Robert C. Gibson	Nebraska Public Power District
Russ L. Wenzl	Nebraska Public Power District
Gulshan K. Pahwa	PSEG Nuclear LLC
Andrew Zach	Senate Environment and Public Works (EPW)
DeLisa S. Pournaras	Southern Company
Lindsey Renee Grissom	Southern Company
Stephan Franzone	Southern Company
Eric Ashley Michael	Tennessee Valley Authority (TVA)
Jonathan Delaune	TVA
Peter John Donahue	TVA
Suzanna Irby Stevens	TVA
Thomas Earl Braudt	TVA
Caleb Fisler	Westinghouse Electric Company
Matthew Golliet	Westinghouse Electric Company
Kristy Gillespie	Vistra Corp
Mark Bensi	Vistra Corp
Marc E. Anderson	Xcel Energy
Jason L. Tribe	Xcel Energy
Matthew T. Sears	Xcel Energy
Steven Sollom	Xcel Energy
Toutseng Hawj	Xcel Energy
W. M. Smith	Xcel Energy
Anne Leidich	
Jana Bergman	
Jim Andersen	
K. Hernandez	
Kevin Wong	
Richard Paese	
Ryan K. Lighty	
Shane Jurek	