

# **Subsequent License Renewal US Industry Perspective**

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# **Key Principles for License Renewal**

- **Current regulatory process is adequate to ensure that the licensing basis of all operating plants provides and maintains an acceptable level of safety so that operation will not be detrimental to public health and safety or common defense and security**
- **Each plant's licensing basis is required to be maintained during any renewal term in the same manner and to the same extent as during the original licensing term**

# **Agree with DLR Staff Conclusions for Four Items**

- **License renewal process and regulations are sound and can support subsequent license renewal**
- **Environmental issues can be adequately addressed by the existing generic environmental impact statement (GEIS)**
- **Helpful for the NRC to revise its license renewal guidance (GALL, SRP) but not essential**
- **No need for applicants to include PRA update because no unique nexus to SLR**

# Overall Concerns with Rulemaking

- **Out of step with “Implementation of the Cumulative Effects of Regulation Process Changes” (SECY-12-0137)**
- **No significant issue, inspection finding, audit report, implementation difficulty, or operational need to implement rulemaking**
- **SECY claims of improved efficiency or “more predictable review process” not backed up with any cost-benefit justification or study**
- **Most changes suggested in SECY not unique to SLR and can be implemented without rulemaking**
- **For these non-safety significant issues, schedule for rulemaking may impact industry plans and NRC staff resource requirements for SLR application reviews**

# Summary of SECY Proposed Changes

- **NRC Staff Proposed 4 Options (SECY -14-0016):**
  - **# 1 – No change to existing 10 CFR 54 regulations**
  - **# 2 – Minor clarifications to 10 CFR 54 for LR and SLR**
    - **Editorial update to 10 CFR 54.4(a)(3) to Reference 10 CFR 50.61a (PTS)**
    - **Clarify Intent of 10 CFR 54.37(b) (NRC updates)**
  - **# 3 – Update 10 CFR 54 for LR and SLR**
    - **Define expectations of Timely Renewal (10 CFR 2.109)**
    - **Revise 10 CFR 54.4(a)(3) to place 10 CFR 50.54(hh) and FLEX equipment in scope of LR**
  - **# 4 – Rulemaking for subsequent renewal-specific changes**
    - **Require that Licensees effectively maintain License Renewal activities and report aging-related degradation after a license is renewed**
    - **Limit the time during which SLR applications can be filed**
    - **Require verification of continuing validity of certain original design parameters**

# **Option 1 – 10 CFR 54 is sound**

- **Part 54 anticipates further rounds of License Renewal**
- **Existing regulatory processes ensure safe operation**
  - **10 CFR 50, Appendix B**
  - **Aging Management Programs (AMPs)**
  - **Maintenance Rule**
  - **ROP process**
  - **Design basis is maintained**
- **Process proven through vast experience, 73 renewed licensed, 27 reactor units in PEO**
- **Reliable, predictable process**

# **Option 2, 3- Unnecessary Changes**

- **“These changes alone may not warrant resource allocation to conduct the rulemaking process” (SECY pg. 6)**
- **54.37(b) can be further clarified in a Regulatory Issue Summary (RIS) if necessary**
- **Timely Renewal – Unnecessary Regulation**
- **Commission considered EP equipment in LR rule not in scope (SOC)**
- **50.54(hh)(2) equipment and FLEX equipment managed by plant procedures.**

# **Option 4 – Conflicts with Fundamental Regulatory Principles in LR Rule**

- **Covered in existing regulatory guidance, GALL review items**
  - ***5. Monitoring and Trending***
  - ***10. Operating Experience***
- **Required by 10 CFR 50, Appendix B**
- **Current industry initiatives underway**
  - **“Use of Industry Operating Experience for Age-Related Degradation and Aging Management Programs” NEI 14-xx**
  - **“Aging Management Program Effectiveness” NEI 14-xx**
- **Not an SLR specific issue – if important, why wait 15 to 20 years to implement**



# **Option 4 – Significant AMP Experience**

## **II. Limit the Time During Which SLR Applications Can Be Filed (<20 Years)**

- Many Aging Management Programs in place from beginning of plant operation**
  - Program improvements made based on OE and research programs (EPRI, DOE)**
  - Industry Initiatives – Buried Piping Program**
- Significant AMP experience in PEO will be available across industry before 1<sup>st</sup> SLR application is submitted (>40 Reactor-years in PEO now)**
- Due to significant economic uncertainty, 20 year planning horizon should be maintained**

# **Option 4 – Validate Original Design Parameters**

- **Undermines the two principles of License Renewal**
- **Matter of current plant operation and addressed through existing NRC Regulatory Processes**
- **Wasteful and inefficient to address in the SLR process and adding to cumulative effects of unnecessary regulations**

# Summary

- **The future of US license renewal depends on certainty in the regulatory process**
- **Existing License Renewal regulation provides a solid foundation for safe operation**
- **SLR Schedule is tight compared to first round of license renewals and may be compromised by SLR Rulemaking**
- **Criteria for rulemaking is not supported by increase in safety nor efficiency improvements**