



Subsequent License Renewal

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Issues

- **One-time SAMA evaluations**
- **Safety by queue position**
- **Current licensing bases**

Preface

Neither license renewal nor subsequent license renewal is inherently unsafe.



Improperly maintained and operated reactors can get into trouble in less than 40 years.

Properly maintained and operated reactors can avoid trouble beyond 40 years.

One-time SAMA evaluations

Severe accident mitigating alternative (SAMA) evaluations are required with initial license renewal application, unless already done for other reason and are not required to be re-done for subsequent license renewal.

One-time SAMA evaluations

SAMA evaluations are good ideas for ALL license renewals:

- safety innovations may have emerged during past two decades**
- populations may have increased during past two decades**
- costs just may have changed during the past two decades**

Safety by queue position

05-19-2004 Ginna relicensed

09-30-2005 GALL Rev. 1 issued

12-23-2005 Point Beach relicensed

Point Beach had to develop an Alloy 600 aging management program before being relicensed.

Ginna was not and still is not required to have one.

Safety by queue position

If safety required Point Beach and later relicensed reactors to have Alloy 600 aging management programs, than 10 CFR 50.100 and 10 CFR 50.109 require Ginna and other relicensed reactors to also have Alloy 600 aging management programs.

Position in line cannot determine safety levels.

Current licensing bases

12-13-1991: License renewal regulation revised to presume, not verify, that reactors comply with all CLB requirements

01-21-1997: AEOD reports 313 LERs involving design errors annually from 1985 to 1995

12-21-2013: Fort Calhoun restarts following 30-month outage to remedy CLB shortcomings

Current licensing bases

License renewal regulation's presumption of CLB compliance has shown to be invalid many times since 1991 and has never yet been proven valid

Recommendations

- **One-time SAMA evaluations**

Require SAMA evaluations with all license renewal applications

- **Safety by queue position**

Enforce 10 CFR 50.100 and 50.109

- **Current licensing bases**

Verify compliance with CLB

Acronym List

AEOD – Office for Analysis and Evaluation of Operating Data (now defunct)

CFR – Code of Federal Regulations

CLB – current licensing bases

GALL – Generic aging lessons learned report

LER – licensee event report

NRC – Nuclear Regulatory Commission

SAMA – Severe accident mitigating alternative