

April 13, 2001

The Honorable Richard A. Meserve
Chairman
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555-0001

Dear Chairman Meserve:

SUBJECT: PROPOSED FINAL LICENSE RENEWAL GUIDANCE DOCUMENTS

During the 481st meeting of the Advisory Committee on Reactor Safeguards, April 5-7, 2001, we reviewed the proposed final versions of NUREG-1800, "Standard Review Plan for Review of License Renewal Applications;" NUREG-1801, "Generic Aging Lessons Learned (GALL) Report;" Regulatory Guide 1.188, "Standard Format and Content for Applications to Renew Nuclear Power Plant Operating Licenses;" and NEI 95-10, Revision 3, "Industry Guideline for Implementing the Requirements of 10 CFR Part 54 - The License Renewal Rule." These documents provide guidance for preparing and reviewing license renewal applications. Our Subcommittee on Plant License Renewal met on March 27, 2001, to review these documents. During our review, we had the benefit of discussions with representatives of the NRC staff and the Nuclear Energy Institute (NEI). We also had the benefit of the documents referenced.

Conclusions and Recommendations

1. The license renewal guidance documents should be approved for issuance.
2. The staff should encourage applicants to include the results of the scoping process in their applications. The availability of these results will facilitate the review process significantly and make license renewal applications more understandable.
3. The staff has agreed to update the GALL report periodically. The staff should also update the Standard Review Plan (SRP) and Regulatory Guide 1.188 to make them consistent with the updated GALL report.

Discussion

We reviewed earlier drafts of the license renewal guidance documents during our November 2-4, 2000 meeting and provided comments and recommendations in a report dated November 15, 2000. We concluded at that time that the draft documents described a consistent and understandable process to support the preparation and review of license renewal applications.

The current versions of the guidance documents include the resolution of comments provided by industry, the ACRS, and the public. The documents were revised to increase focus, eliminate insignificant aging effects, improve clarity, and to include changes resulting from the resolution of technical issues between the staff and the industry. The documents now provide closure for the great majority of aging management issues. The staff is continuing its dialogue with NEI and current applicants on a number of residual issues. This dialogue is likely to continue for some time as issues are closed and other issues are identified as a result of the lessons learned from reviewing future license renewal applications.

The development and staff review of previous license renewal applications would have been facilitated by the availability of a clearly defined baseline for regulatory acceptance that the guidance documents now provide. Given the significant number of applications being developed by licensees and reviewed by the staff, we agree with the staff and NEI that these documents should be approved. Changes resulting from the continuing dialogue between the staff and the industry can be incorporated into future updates. The staff has agreed to update the GALL report periodically. It should also update the SRP and Regulatory Guide 1.188 accordingly.

The License Renewal rule requires that for those structures, systems, and components (SSCs) that are within the scope of license renewal, applicants identify structures and components that are subject to an aging management review (AMR). The industry has taken the position that an applicant needs to include in its application only a description of the methodology used to implement the scoping and screening processes and the results of the screening process (i.e., the list of structures and components identified as requiring an AMR). The staff has modified the guidance documents to reflect this position. This meets the requirement of the rule, but our experience with past license renewal applications is that the scoping process is complex, and the lack of the scoping process results in the application (i.e., the list of SSCs that are within the scope of license renewal) represents a significant challenge for the reviewers and interested members of the public. An application that includes the results of the scoping process is more scrutable, facilitates the staff's review, and assists the staff in determining that structures and components subject to an AMR have been consistently identified. Without this information, the staff must rely on requests for additional information, site audits, and limited sampling of components not selected for an AMR. Inclusion of this information in the application does not constitute a significant added burden to the applicant and should, therefore, be encouraged.

Sincerely,

/RA/

George E. Apostolakis
Chairman

References

1. U.S. Nuclear Regulatory Commission, NUREG-1800, "Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants," dated March 1, 2001.
2. U.S. Nuclear Regulatory Commission, NUREG-1801, Vol. 1, "Generic Aging Lessons Learned (GALL) Report," dated March 1, 2001.
3. U.S. Nuclear Regulatory Commission, Regulatory Guide 1.188, "Standard Format and Content for Applications to Renew Nuclear Power Plant Operating Licenses," March 2001.
4. NEI 95-10, Revision 3, "Industry Guideline for Implementing the Requirements of 10 CFR 54 - The License Renewal Rule," March 2001.
5. U. S. Nuclear Regulatory Commission, NUREG-1739, "Analysis of Public Comments on the Improved License Renewal Guidance Documents," dated March 1, 2001.
6. Report dated November 15, 2000, from D. A. Powers, Chairman, Advisory Committee on Reactor Safeguards, to R. A. Meserve, Chairman, U.S. Nuclear Regulatory Commission, Subject: License Renewal Guidance Documents.