

1 UNITED STATES OF AMERICA  
2 NUCLEAR REGULATORY COMMISSION

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4 BRIEFING ON STATUS OF LICENSE RENEWAL

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6 PUBLIC MEETING

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8 Nuclear Regulatory Commission  
9 Commission Hearing Room  
10 11555 Rockville Pike  
11 Rockville, Maryland

12  
13 Thursday, June 12, 1997

14  
15 The Commission met in open session, pursuant to  
16 notice, at 9:35 a.m., the Honorable SHIRLEY A. JACKSON,  
17 Chairman of the Commission, presiding.

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19 COMMISSIONERS PRESENT:

- 20 SHIRLEY A. JACKSON, Chairman of the Commission
- 21 KENNETH C. ROGERS, Member of the Commission
- 22 GRETA J. DICUS, Member of the Commission
- 23 EDWARD McGAFFIGAN, JR., Member of the Commission
- 24 NILS J. DIAZ, Member of the Commission

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1 STAFF AND PRESENTERS SEATED AT COMMISSION TABLE:

- 2 KAREN D. CYR, General Counsel
- 3 JOHN C. HOYLE, Secretary
- 4 JOSEPH CALLAN, EDO
- 5 SAM COLLINS, Director, NRR
- 6 MARYLEE SLOSSON, Acting Director, Division of
- 7 Reactor Program Management, NRR
- 8 DAVID MATTHEWS, Chief, Generic Issues and
- 9 Environmental Projects Branch, NRR
- 10 STEPHEN HOFFMAN, SR., Project Manager, License
- 11 Renewal Directorate, NRR

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1 P R O C E E D I N G S

2 [1:33 p.m.]

3 CHAIRMAN JACKSON: Good afternoon. I don't  
4 usually name names, but good afternoon, Marylee, Steve, Joe,  
5 Sam, and Dave.

6 The purpose of today's meeting between the  
7 Commission and the NRC staff is to discuss the status of  
8 activities associated with the implementation of the license  
9 renewal rule for nuclear powerplants, which is 10 CFR Part  
10 54.

11 Since the original license renewal rule was issued  
12 in December of 1991, the staff and the nuclear power  
13 industry have been working to implement the requirements of  
14 the rule effectively. After about two years of experience  
15 with activities related to implementing the rule, the staff  
16 and the nuclear power industry identified several key issues  
17 that needed to be resolved in order to provide a more stable  
18 and predictable regulatory process for license renewal.

19 In February 1994 the Commission directed the staff  
20 to proceed with rulemaking to amend 10 CFR Part 54, and in  
21 May 1995 a revised license renewal rule was published. The  
22 revised rule focused on the management of the effects of  
23 aging on certain systems, structures, and components during  
24 the period of extended operation. Since the revised rule  
25 was published in 1995 the staff and the nuclear power

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1 industry have continued to work on acceptable strategies and  
2 guidance to implement the requirements of the rule  
3 effectively. In SECY 97-118, entitled "Activities  
4 Associated with the Implementation of 10 CFR Part 54," the  
5 staff has provided the Commission with an update on the  
6 status of ongoing staff and industry initiatives associated  
7 with the license renewal rule.

8 The Commission therefore looks forward to the  
9 discussion with our staff on license renewal activities. In  
10 particular, the Commission is interested in first  
11 understanding what if any potential policy issues might  
12 require Commission decision, and, second, understanding how  
13 all the ongoing activities associated with, for example,  
14 regulatory guide development, standard review plan  
15 development, the license renewal demonstration program,  
16 industry report template development, will all coalesce into  
17 timely, clear, and coherent implementation guidance.

18 Now I understand that copies of your presentation  
19 are available at the entrances to the meeting, and so unless  
20 my fellow Commissioners have any opening comments, Mr.  
21 Callan, please proceed.

22 MR. CALLAN: Well, Chairman, you covered all the  
23 points I was going to make at the outset.

24 CHAIRMAN JACKSON: Good. We'll go on the next  
25 person.

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1 MR. CALLAN: In fact, you even identified  
2 everybody at the table.

3 [Laughter.]

4 But I'll go through it again and provide their  
5 full names and their titles.

6 Once again, Sam Collins; he's the Director of NRR.  
7 Marylee Slosson, the Acting Director of the Division of  
8 Reactor Program Management. Dave Matthews, the Project  
9 Director of the Generic Issues and Environmental Projects  
10 Branch. And then finally Steve Hoffman, the Senior Project  
11 Manager in the License Renewal Project Directorate.

12 Marylee Slosson will begin the presentation for  
13 the staff.

14 MS. SLOSSON: Thank you.

15 Good afternoon. I'm going to go ahead and start  
16 with the second slide, because the Chairman very aptly went  
17 through the kind of the history and brief summary of the  
18 license renewal a little, but I was going to go through, so  
19 if we could go ahead and have the second slide, with the  
20 license renewal program as with any program, the program is  
21 developed on key principles.

22 In the case of license renewal, the two principles

23 on which the staff has proceeded are based on some  
24 significant Commission determinations during the rulemaking  
25 process as outlined on this slide. The first principle of

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1 license renewal is that with the possible exception of the  
2 detrimental effects of aging on the functionality of certain  
3 plant systems, structures, and components in the period of  
4 extended operation, and possibly a few other issues related  
5 to safety only during the extended period of operation, the  
6 regulatory process is adequate to ensure that the licensing  
7 basis of all currently operating plants provides and  
8 maintains an acceptable level of safety so that operation  
9 will not be inimical to public health and safety or common  
10 defense and security.

11 The second principle of license renewal is that  
12 the licensing basis must be maintained in the same manner  
13 and to the same extent during the period of extended  
14 operation as it was during the original licensing term.  
15 Issues that may arise relevant to current plant operation  
16 must be addressed as part of the current plant license and  
17 cannot be deferred to a renewal review. For example, the  
18 issues that have resulted from Millstone and Maine Yankee  
19 lessons-learned reviews related to 10 CFR 5059, licensing,  
20 and design bases are being addressed as part of the  
21 operating reactors program. Any process improvements that  
22 are realized as a result of the lessons-learned initiatives  
23 will carry forward into the renewal term. Therefore, this  
24 approach fully supports the principles upon which license  
25 renewal is based.

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1 If I can have the third slide, please.

2 We'd now like to begin the status portion of  
3 today's briefing, during which we'll discuss ongoing  
4 industry and staff activities and plant-specific and owners  
5 groups areas. We'll also discuss development of  
6 implementation guidance, environmental activities, and our  
7 planned future activities. If there are not any questions  
8 at this time I'd like to turn the presentation over to Mr.  
9 Stephen Hoffman.

10 CHAIRMAN JACKSON: Before you go --

11 [Laughter.]

12 So given what you were just saying about the  
13 licensing basis issues coming out of the various initiatives  
14 that are already under way, would you say that given what we  
15 already are doing that there's nothing in our recent  
16 regulatory experiences since the Commission laid out these  
17 principles that have caused us to reexamine the adequacy of  
18 those principles?

19 MS. SLOSSON: That's right, I don't believe within  
20 any of the Millstone lessons-learned issues we've identified  
21 anything.

22 CHAIRMAN JACKSON: Okay. And then the second  
23 question is whether you can give us some sense in the  
24 aggregate of whether industry interest in pursuing license  
25 renewal has decreased, remained the same, or increased as a

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1 consequence of the economic deregulation and restructuring  
2 in the industry, and a related question is I notice that the  
3 CE owners group appears to be the only owners group not  
4 sponsoring a license renewal effort, and do you know if they  
5 plan to do so, and are they supportive of the BG&E license  
6 renewal effort?

7 There are only five questions.

8 MS. SLOSSON: Only five questions to answer.  
9 I guess with respect to economic deregulation I  
10 think it's --

11 CHAIRMAN JACKSON: Let's leave it -- let's just  
12 put it in a more neutral tone.

13 Have you noticed any change over the last year,  
14 couple of years in terms of any waning or increase of  
15 interest in the license renewal area in an active way?

16 MS. SLOSSON: Do you want to --

17 MR. HOFFMAN: I'd say generally it's stayed the  
18 same or maybe we've actually gotten a little more certain  
19 interest from licensees in the process.

20 CHAIRMAN JACKSON: What about the question related  
21 to the CE owners group activities?

22 MR. HOFFMAN: They have not approached us as to  
23 any intent to submit anything with the staff. I think they  
24 are letting BG&E take the lead.

25 CHAIRMAN JACKSON: Are they providing support for

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1 that effort?

2 MR. HOFFMAN: That I can't answer.

3 CHAIRMAN JACKSON: Okay. Thanks.

4 MS. SLOSSON: All right, Steve, if you can go  
5 through the status.

6 MR. HOFFMAN: All right. Industry approach to  
7 date for license renewal has been to actually submit  
8 technical reports and methodologies for staff review and  
9 approval in advance of actually submitting a formal  
10 application. The intent is that, and it's allowed by the  
11 rules, that once they obtain this approval, they could  
12 incorporate by reference these reports that have been  
13 accepted by the staff. This gives them better information  
14 on which to decide whether to continue operation after the  
15 current license term and give them some idea as to the cost  
16 of the aging management programs.

17 As was indicated in the previous slide, we've got  
18 two licensees that are three owners groups that have been  
19 preparing reports and submitting them to the staff. Other  
20 licensees we are aware of have also been active supporting  
21 the owners groups activities as well as the NEI generic  
22 effort like on the Reg Guide, but we've gotten no formal  
23 indication from them as to, you know, planned submittals at  
24 this time.

25 The slide on BG&E, please.

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1 Baltimore Gas & Electric has been active since  
2 practically 1990 in license renewal. They incorporated  
3 license renewal as part of their life-cycle management for  
4 program for Calvert Cliffs. Although no decision has been  
5 made yet to submit an application by BG&E, they currently  
6 expect to complete preparation of their application by fall  
7 of 1997. So it will be ready. They actually made their  
8 first submittal back in 1993 with their methodology for  
9 performing the integrated plan assessment. We were  
10 reviewing that when the staff decided to go back and amend  
11 the rule. After the rule was issued they revised that  
12 methodology, resubmitted it, and we have reviewed it and  
13 found it acceptable in a final staff safety evaluation  
14 report. BG&E's approach has been to prepare the reports for  
15 the systems structures and in some cases major components  
16 such as the vessel internals that they handle in separate  
17 reports.

18 As part of a demonstration program for the Reg  
19 Guide, which I'll talk about a little bit more later on, the

20 staff was on site, and we looked at some of the reports that  
21 they were preparing, and we found that in a number of areas  
22 they contained sufficient information for the staff to begin  
23 its technical review and submit it, but there was some  
24 concern in a couple areas as to whether or not there was  
25 enough detail there.

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1 In response BG&E agreed to prepare a formal and  
2 content template, and between May of '96 and January of this  
3 year the staff and BG&E worked to review that report and to  
4 resolve implementation issues based on some examples they  
5 used to implement that. We concluded that if that template  
6 is properly implemented, the reports that are prepared on  
7 that and submitted to the staff should have sufficient  
8 information for us to begin our renewal review.

9 In parallel with that template review they asked  
10 and we agreed, they actually submitted five technical  
11 reports and asked for us to review them in the area that we  
12 did not have any concerns identified as part of the  
13 demonstration program. That review is going on. We have  
14 issued a request for information and they're responding.

15 End of May we just received four new reports.  
16 These were prepared using the template and we've just begun  
17 our review on that.

18 Their plan is to submit a total of 28 technical  
19 reports by fall of this year, which will constitute pretty  
20 much the technical portion of a renewal application.

21 CHAIRMAN JACKSON: Let me ask you this question,  
22 can you give us some sense of what level of staff resources  
23 and over what time frame will be necessary to complete the  
24 review of the BG&E technical reports? Have you been able to  
25 consider that? I don't know who wants to answer that.

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1 MS. SLOSSON: I will answer that.

2 We anticipate that the review of the reports will  
3 be completed by the end of 1999 if we get them on the  
4 schedule as indicated. And our level of effort for license  
5 renewal for '98 is approximately 20 FTE and \$900,000 and, in  
6 '99, approximately 25 FTE and a million dollars for review  
7 of those reports.

8 CHAIRMAN JACKSON: Let me ask you the next  
9 question. And this has to do, really, with kind of  
10 stability of the regulatory framework. So that is the  
11 context in which I am asking this question. And it may be a  
12 bit early to address it and, if it is, you know, tell me and  
13 then I'll ask you, you know, in another meeting or in  
14 another way, can you discuss the relationship  
15 between -- which you have said the staff has basically  
16 approved between the BG&E report template, NEI guidance  
17 91-10, which has been, I guess, reg guide endorsed, and the  
18 draft license renewal standard review plan?

19 You know, there is a NUREG 1568, owners groups  
20 topical reports and the plant-specific application. Now,  
21 that's a lot.

22 But I guess, you know, and I'm not asking you  
23 necessarily to go through each one chapter and verse but I  
24 want to understand the sense in which these things are all  
25 consistent or not consistent so that we are not in a

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1 position where things get approved and then a standard  
2 review plan or some other guidance comes along that is a  
3 little different, et cetera, et cetera, because our staff  
4 needs to know what they are going to review against and the

5 industry needs to know going forward beyond BG&E's template  
6 is that going to be the game? You know, what it is they are  
7 going to be reviewed against?

8 MR. HOFFMAN: Okay, if I leave anything out let me  
9 know.

10 Regarding BG&E's template, BG&E actually was  
11 further along when we started the reg guide in review of NEI  
12 95-10, so their template, their methodology is more plant  
13 specific, it is equivalent to the staff is making sure that  
14 what is in their approach is consistent with what we are  
15 doing with 95-10.

16 As far as the various documents, they all really  
17 are interrelated. You know, if we are looking at something  
18 on an owners group report or for BG&E, it turns out it is  
19 also typically coming up like in the review of NEI 95-10 or  
20 it's an area that we are looking at for incorporating the  
21 guidance in the SRP. So as we go through this, the rest of  
22 the presentation, you are going to see there are a lot of  
23 activities going on and we are trying to pull it all  
24 together at the same time to come up with consistent  
25 guidance that will be of use to both the staff and the

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1 industry.

2 CHAIRMAN JACKSON: Right, and it is important that  
3 they are all knit together, so that you are not all doing  
4 this one and then the next guy, you know, you tell him to  
5 bring you his rock and you're going to review it against  
6 some separate criteria and that's what the concern is.

7 MS. SLOSSON: And the first two review cycles that  
8 we are going through are very, very important because they  
9 do provide us with specific issues that we are using to  
10 develop that guidance that will be used generically.

11 CHAIRMAN JACKSON: So it is almost like a pilot?

12 MS. SLOSSON: It is very similar to a pilot.

13 CHAIRMAN JACKSON: All right.

14 MS. SLOSSON: And the resource numbers I gave you  
15 were for the entire license renewal, it wasn't just for  
16 BG&E.

17 CHAIRMAN JACKSON: I see. Okay.

18 MS. SLOSSON: That was a total effort. But I  
19 wanted to clarify that.

20 [Laughter.]

21 MR. CALLAN: Including environmental.

22 CHAIRMAN JACKSON: Is that right?

23 MS. SLOSSON: Right.

24 CHAIRMAN JACKSON: Okay.

25 MR. HOFFMAN: Slide five, please.

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1 Duke Power Company has also been very active in  
2 license renewal since around early 1993, not only on  
3 Oconee-specific activities but they have also been  
4 supporting the NEI effort, the B&W Owners Group and  
5 Westinghouse Owners Group activities.

6 Their approach is a little different than BG&E.  
7 They are preparing one report with five major sections.  
8 They are taking a discipline approach similar to the format  
9 of the FSAR. They are going to be evaluating all of the  
10 electrical instrumentation and control components in one  
11 group, mechanical components, the structures and then they  
12 will address the reactor building and reactor coolant  
13 systems separately.

14 They have indicated that they intend to  
15 incorporate by reference the topical reports that are under  
16 review by the B&W Owners Group and one of the Westinghouse

17 Owners Group topicals.  
18 Their goal is to complete the application and be  
19 prepared for a submittal in late 1998 if the company makes  
20 the decision to formally apply. They have indicated that  
21 some of their considerations they are looking at besides  
22 technical and environmental include the regulatory aspects,  
23 the financial and the political concerns associated with  
24 actually applying for renewal.  
25 In July of '96, they submitted their first section

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1 on the reactor building. The staff looked at it and found  
2 that it didn't have, in some areas, sufficient information  
3 for us to begin our review. In response, they committed to  
4 preparing this generic format and content document using the  
5 reactor building as a guide. Kind of like the BG&E template  
6 effort to establish the -- what's necessary for a report to  
7 begin review. They submitted that in late '96. We reviewed  
8 it. Actually went on site in January of '97 to look at some  
9 of the backup documentation and how it was being implemented  
10 and we found that between the document itself and some  
11 commitments they made in response to comments that it should  
12 provide the guidance necessary to prepare reports sufficient  
13 for our review.

14 They revised the reactor building report and  
15 submitted it in March of this year and we are currently  
16 reviewing that.

17 The remaining four sections are scheduled to come  
18 in by fall of this year with essentially complete -- there  
19 may be a couple holes. But those will be finished by the  
20 end of the year. And, again, that should constitute pretty  
21 much the technical portion of an application.

22 CHAIRMAN JACKSON: Let me ask you this question.  
23 You mentioned that Duke may incorporate by reference both  
24 B&W Owners Group and Westinghouse Owners Group topical  
25 reports. Are there any concerns vis-a-vis proprietary

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1 material?

2 MR. HOFFMAN: Not with these reports.

3 CHAIRMAN JACKSON: And the other question is,  
4 would an a la carte, you know, approach be allowed where an  
5 applicant can pick and choose sections of topical reports  
6 and, if so, will this facilitate or complicate our reviews?

7 MR. HOFFMAN: Well, Duke has been very active in  
8 the B&W Owners Group effort and so I wouldn't expect them to  
9 be taking parts of the topicals. If they chose not to use  
10 the entire topical, we would have to look at it more as a  
11 plat-specific submittal as opposed to a preapproved approach  
12 because we have discussed with the industry and it is in the  
13 guideline that, if you are going to use a topical, you have  
14 to show how you are enveloped and how any site-specific  
15 commitments are being made before you can use it.

16 Okay, next slide.

17 Babcock & Wilcox Owners Group is active. They  
18 were actually the first owners group to make a submittal.  
19 They've got a generic program for five operating plants  
20 which are the three Oconee units of Duke's, GPU's CMI-1 and  
21 Entergy's two Arkansas units. They have submitted three of  
22 the four planned component topical reports on reactor  
23 coolant system piping, pressurizer and the reactor vessel.  
24 Based on the review, we have already found one acceptable on  
25 the final safety evaluation report. We have issued another

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1 draft and we are working on a second final safety evaluation

2 report and draft. We expect the final report this month on  
3 the vessel internals.

4 Our review -- actually what they have indicated  
5 is, in the future, after they complete the topical work,  
6 they will take on the longer term generic issues that may be  
7 identified in renewal as well as provide support to Duke and  
8 the other licensees who may apply for renewal.

9 A review of the reports to date has been more  
10 advanced on B&W than the others because they have been in  
11 longer, has been that generally existing programs have been  
12 sufficient.

13 We have found in some cases where enhancements  
14 have been needed, say on small bore piping and augmented  
15 inspection but in general the existing programs have been  
16 sufficient.

17 CHAIRMAN JACKSON: Is the B&W generic license  
18 renewal effort still broadly supported by the members?

19 MR. HOFFMAN: It's been supported for some time by  
20 three of the five.

21 One member, Florida Power, was involved early on,  
22 but our understanding is that they dropped out due to  
23 financial reasons, not for lack of interest.

24 One never was involved -- Toledo Edison.

25 Westinghouse Owners Group -- their program has

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1 been very active too. They are preparing 15 topical reports  
2 for major components and structures. The intent is to bound  
3 all Westinghouse plants with the reports.

4 Their reports give the attributes of an acceptable  
5 aging management program as opposed to B&W's, where with the  
6 smaller population of plants they have actually made  
7 commitments to specific programs.

8 They have submitted four topical reports that are  
9 under review. We're preparing a draft safety evaluation  
10 report on the reactor coolant system supports and the  
11 remainder in various stages of requests for information and  
12 responses.

13 The fifth report on the vessel internals is  
14 scheduled to be submitted this month, and then they have  
15 indicated that they plan to submit an additional two to  
16 three reports.

17 The Boiling Water Reactor Owners Group program was  
18 based on preparing topic reports for reference design. They  
19 picked the BWR Mark I and an applicant that came in, if  
20 there were any differences would justify those in their  
21 plant-specific application.

22 They submitted the first of their six planned  
23 reports on the containment in December of '95 which the  
24 Staff reviewed and issued a request for additional  
25 information on in February '96. That review was put on hold

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1 by the BWR Owners Group initially because of funding.

2 We just received a letter from them in May  
3 indicating that they are going to maintain that hold on  
4 their program and let the implementation issues, the process  
5 issues that have been identified as part of their report  
6 review and the Reg Guide, let them be resolved by the lead  
7 plant reviews.

8 CHAIRMAN JACKSON: So that is all BWR Owners Group  
9 license renewal activities?

10 MR. HOFFMAN: In the Owners Group, yes.

11 CHAIRMAN JACKSON: And if some of the technical  
12 issues are associated with the BWR containments, how does  
13 suspending action resolve those issues?



14 MR. HOFFMAN: Well, some of them deal with the  
15 interpretation of the guidance, which I will get into more  
16 in the Reg Guide effort and where -- what is going to be  
17 necessary in an application.

18 CHAIRMAN JACKSON: Okay.

19 MR. HOFFMAN: So they are going to let the lead  
20 plants take those on.

21 The regulatory guide development began in earnest  
22 in May of '95 when we amended the rule. A little bit of  
23 background for you. About that time Nuclear Energy  
24 Institute approached us and indicated they were preparing  
25 the industry guideline, NEI 95-10, and requested our review

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1 and endorsement if it was found acceptable.

2 We agreed to that, and there were extensive  
3 interactions between August of '95 and March of '96 that  
4 resulted in us preparing the draft Reg Guide that was  
5 published for comment in August of '96 that proposed  
6 endorsement of NEI 95-10, rev. zero.

7 During this development process, that was March to  
8 August of '96, we participated in a trial application of the  
9 95-10 guidance. NEI sponsored an industry demonstration  
10 program in which six utilities participated. That was  
11 Baltimore Gas & Electric, Duke, Southern Nuclear, Wisconsin  
12 Electric, Philadelphia Electric, and Virginia Power.

13 The Staff actually sent a team out to each of the  
14 licensees with the exception of Virginia Power, which chose  
15 not to participate in the Staff site visit but underwent an  
16 NEI-led peer review.

17 The intent was to look at, assess the adequacy of  
18 the guidance and the ability of the participants to  
19 implement the guidance and obviously identify any needs for  
20 revision.

21 In the demonstration program the licensees used  
22 the guidance to select certain system structures and  
23 components and then they kind of ran it through the process  
24 of doing the integrated plan assessment, evaluated time  
25 limited aging analysis, and prepared sample application

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1 materials that the Staff reviewed.

2 Generally what we found was that the 95-10, rev.  
3 zero contains the basic guidance needed to prepare an  
4 application, but we did see some inconsistent application of  
5 the guidance as well as some areas where improvements could  
6 be made or additional clarification would avoid conflicts in  
7 the future.

8 We did publish our lessons learned in a NUREG  
9 Report 1568.

10 During the public comment period we also conducted  
11 a public workshop to allow as much opportunity for the  
12 public to be involved in this. We discussed the rule, the  
13 Reg Guide and 95-10 guidance, and the demonstration program  
14 lessons learned, since that was being completed towards the  
15 end of the public comment period.

16 The comment period ended at the end of November of  
17 '96 and we received comments from NEI, five licensees, two  
18 owners groups, and the Department of Energy. No comments  
19 from the general public.

20 The comments received on the Reg Guide raised some  
21 issues with interpretation of the wording and some of the  
22 guidance contained in the draft Reg Guide and 95-10.

23 Discussions with industry on the issues raised by  
24 the comments helped establish a better understanding of the

25 differences in interpretation in some of the areas.

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1 Examples of some of the areas that were discussed  
2 were the amount of information needed to demonstrate the  
3 adequacy of existing programs being credited for aging  
4 management, the amount of detail needed in an application  
5 versus onsite available for Staff inspection, and the level  
6 at which intended functions must be maintained and whether  
7 component failure was allowed.

8 After extensive discussions with the industry, the  
9 Staff now believes that the issues associated with the  
10 guidance can best be resolved through trial application of  
11 the draft guidance on specific structure and component  
12 reviews.

13 Therefore, we have modified our approach for  
14 developing the final Reg Guide and instead of issuing it  
15 final in September of '97, as currently planned, we intend  
16 to focus on plant-specific and owners group reviews using  
17 the draft Reg Guide and the working draft standard review  
18 plan for license renewal that I will talk about next to gain  
19 the needed experience with implementation of the rule and  
20 use that to help finalize the Reg Guide as well as the  
21 standard review plan.

22 CHAIRMAN JACKSON: So then where would that track  
23 you to when you think you would finalize the Reg Guide?

24 MR. HOFFMAN: What we would expect to do is  
25 actually the guidance would not just sit. We would

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1 incorporate a lot of that guidance that has been developed  
2 and is being developed into the working draft of the  
3 standard review plan, which is scheduled to be updated and  
4 put in the public document room in September.

5 CHAIRMAN JACKSON: How appropriate would it be to  
6 incorporate or to endorse, to publish a Reg Guide that  
7 endorses those portions of 95-10 that we feel are  
8 appropriate and then to supplement the Reg Guide on the  
9 issues that have yet to be resolved at a later date?

10 MR. HOFFMAN: We considered that, but what we are  
11 seeing is the interpretation by some of the -- like the  
12 commenters that there's some principles that run throughout  
13 that if we did that it would get the guidance out there, but  
14 we are not certain that it is really a document that the  
15 industry in the majority would embrace and would feel would  
16 be useful for pursuing renewal.

17 What we are finding is that we have got two  
18 licensees and two owners groups that are proceeding using  
19 the guidance that is available. They have indicated that  
20 they don't need the Reg Guide in order to proceed.

21 Generally what we find is that when we focus on a  
22 specific structure on component with a licensee or an owners  
23 group that we can work through these issues and we can come  
24 to agreement as to what is acceptable for an application.  
25 It is when we go back up and start talking in broad terms,

25

1 broad policy type statements that we then start debating  
2 interpretations of the wording.

3 CHAIRMAN JACKSON: And that is why you are saying  
4 that you want to incorporate the experience gained from  
5 implementing it on plant-specific and the owners group.

6 You were going to make a comment, Sam?

7 MR. COLLINS: No.

8 CHAIRMAN JACKSON: Just showing your interest?

9 MR. COLLINS: Right.

10 CHAIRMAN JACKSON: Okay.

11 COMMISSIONER MCGAFFIGAN: What would be the  
12 plan -- it will be several years before you try to  
13 finalize -- but there would be another round of public  
14 comment at that point where you would put out a new revised  
15 draft and go through a process at that point? Is that the  
16 thought?

17 MR. HOFFMAN: I think we'll have to.

18 We haven't really looked at it in detail but it is  
19 most likely we would.

20 We wouldn't terminate actually the process with  
21 Nuclear Energy Institute. The idea is not to stop. It's  
22 just to -- I think it would be better to focus our resources  
23 on these lead plant reviews and finishing the owners group  
24 topical, and then continue the interaction with NEI, just  
25 not on as high a priority basis.

26

1 During the draft work we were meeting with them  
2 weekly. We had -- it was a very intensive effort trying to  
3 produce the final document, so we would continue the effort  
4 with NEI during this time.

5 CHAIRMAN JACKSON: Okay.

6 MR. HOFFMAN: We have already covered part of  
7 this. We placed -- the original draft standard review plan  
8 for license renewal was issued for comment back in 1990 but  
9 it was based on the '91 rule so we updated that to reflect  
10 actually it was the '94 proposed rule wording and agreements  
11 that were reached from -- back in that timeframe there was a  
12 NUMARC initiative in which were prepared industry reports  
13 that addressed aging management for some structures and  
14 components.

15 The Staff had been doing a review. We  
16 incorporated the agreements from that into that working  
17 draft standard review plan.

18 Currently we are working on updating and expanding  
19 that to capture -- there were some modifications for the  
20 final '95 amended rule wording, the experience we have  
21 gained from the plant and owners group reviews to date, the  
22 experience from the draft Reg Guide development and also  
23 some additional administrative requirements and that should  
24 be in the PDR by September.

25 The current schedule is to publish the draft

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1 standard review plan for public comment after the review of  
2 several renewal applications to allow experience to be  
3 gained.

4 Next I would like to discuss two areas that we are  
5 monitoring for potential effect on implementation of the  
6 license renewal.

7 That is use of risk insights and maintenance rule  
8 experience.

9 Regarding the use of risk insights, the Staff  
10 recently received Commission approval to publish the draft  
11 regulatory guides and standard review plan that provide  
12 guidance for using probabilistic risk assessment and risk  
13 informed decisions on plant-specific changes to the current  
14 licensing basis.

15 These Reg Guides and SRPs were submitted to the  
16 Commission in SECY 97-077.

17 Once issued final, licensees will be able to use  
18 this guidance to make changes to its COB during the current  
19 operating term, and, consistent with the principles of  
20 license renewal, the regulatory process carries forward into  
21 the renewal term so a renewal applicant would be able to use

22 this guidance in preparing its application as well as in the  
23 renewal term.

24 Specifically for license renewal, when the amended  
25 license renewal was issued, the Commission stated in the

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1 statement's consideration that PRA could be used by a  
2 renewal applicant when assessing the relative importance of  
3 a structure or component subject to an aging management  
4 review and for developing the aging management program.

5 The PRA Reg Guides that were just approved for  
6 issuance for draft for comment could also be used for  
7 guidance for an applicant in performing these assessments.

8 We also plan to use risk insights when we develop  
9 the inspection program for license renewal, which I will  
10 talk about again in a minute.

11 Maintenance rule experience -- the license renewal  
12 relies on existing licensee programs, in particular the  
13 maintenance rule -- that was clear in the amended '95  
14 rule -- to conclude that active components can be  
15 generically excluded from the scope of renewal review  
16 because the effects of aging are more readily detectable.

17 Although passive structures and components are  
18 technically within the scope of the maintenance rule, the  
19 Commission at that time believed that there was insufficient  
20 experience regarding the evaluation of long-term effects of  
21 aging on passive functions to be able to generically exclude  
22 them from renewal review.

23 Because of this dependence on the maintenance  
24 rule, license renewal staff is monitoring the implementation  
25 of the maintenance rule and the baseline inspections being

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1 performed to determine how lessons learned from the  
2 maintenance rule can best be factored into the license  
3 renewal process.

4 One example of an issue identified by the  
5 maintenance rule, inspections, has been the need for  
6 additional guidance for monitoring the structures. That was  
7 described in the maintenance rule status paper, SECY 97-055.

8 In that case license renewal staff has been  
9 participating in the Staff activities to develop guidance  
10 for both operating reactors as well as for the renewal term.

11 The help the exchange of information, both the  
12 maintenance rule and license renewal staffs have been  
13 monitoring and participating in each other's activities.  
14 Maintenance rule staff was active in our development of the  
15 draft Reg Guide and participated in the demonstration  
16 program for the Reg Guide.

17 License renewal staff is going to be participating  
18 in a maintenance rule baseline inspection, and we are  
19 monitoring the results of their ongoing inspections for any  
20 lessons learned.

21 Okay, Inspection Program Development. The intent  
22 is to prepare a draft of the inspection program for license  
23 renewal to support review of the first application. We're  
24 using the ongoing dialogue with industry and the experience  
25 gained from reviews of the owners group and plant-specific

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1 documents to help staff know where to focus its inspection  
2 efforts and where there's a need for new or modified  
3 programs both for the renewal review as well as on into the  
4 renewal term.

5 We also like I said plan to use risk insights in  
6 establishing that program, consistent with like the SRP we  
7 would finalize that inspection program after we've gained

8 the experience of several renewal application reviews.

9 If there's no additional questions, I'll let Dave  
10 Matthews discuss environmental.

11 MR. MATTHEWS: Good afternoon.

12 Before I present a description of the status of  
13 our environmental review activities associated with license  
14 renewal, I think it would be helpful to review just briefly  
15 in contrast to the Part 54 rulemaking activities that there  
16 was a companion rulemaking activity in the environmental  
17 protection area associated with an amendment to Part 51 to  
18 address license renewal.

19 Part 51 was revised finally to address license  
20 renewal issues in December of 1996, just last year. That  
21 rule revision was based on a generic Environmental Impact  
22 Statement to address the environmental impacts attendant to  
23 license renewal, which was issued in final form in May of  
24 1996. In turn that GEIS was based on operating experience  
25 from an environmental perspective of the 118 reactors that

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1 were either operating at the time or planned in 1991 when  
2 this effort was undertaken.

3 The result of that rulemaking activity and GEIS  
4 development focused on 92 impacts associated with license  
5 renewal that related to environmental protection. Those 92  
6 impacts were sorted and classified in the final rule into  
7 two categories. Category 1 impacts, and there were 68 of  
8 those that were dealt with by the Commission's approval in a  
9 generic capacity, and 24 site-specific impacts, referred to  
10 as category 2 impacts, that were to be left for  
11 determination during the site-specific evaluation of the  
12 environmental impacts.

13 I think it would also be helpful if I could turn  
14 to background slide 6, to just briefly describe the process  
15 that is outlined in part 51 for a plant-specific review.  
16 And the major steps are the staff's environmental review of  
17 an application. In this case we're talking the licensee's  
18 environmental report. That would then result in the staff  
19 issuing a site-specific supplemental Environmental Impact  
20 Statement in draft form addressing those 24 issues that were  
21 left to site-specific review.

22 The staff at that point following the draft and  
23 the scoping process and public comment would issue a final  
24 Environmental Impact Statement and would make a  
25 determination of the acceptability of the license renewal

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1 action. At that point the responsibility turns to the  
2 Commission to issue a record of decision based on that  
3 Environmental Impact Statement and the staff's conclusion,  
4 and the wording of that record of decision that's called for  
5 in Part 51 relates to preserving the option of license  
6 renewal for energy-planning decision makers. That is a  
7 little different from the traditional cost-benefit balancing  
8 that is usually done in environmental reviews, and that's  
9 articulated in the final rule.

10 Turning back now to the status slide, which is  
11 slide 12, at the time that the Commission approved for final  
12 publication the revisions to Part 51 they also requested the  
13 staff to address the issue of guidance associated with the  
14 implementation of that rule, and the two elements of that  
15 guidance and the staff responded to the Commission with a  
16 schedule for these, were the environmental standard review  
17 plan, which we plan to publish for public comment in August  
18 1997, and we're on schedule to do that, and the hope is

19 provided the comments are such that we can resolve them  
20 expeditiously, is to issue a final environmental standard  
21 review plan in August of 1998. In addition a regulatory  
22 guide is under preparation, with the planned schedule for  
23 that of being published for public comment in July of 1997,  
24 with a reg guide to be finalized in March of 1998.

25 Consistent with the approach you've just heard

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1 with regard to Part 54 review efforts, we have had  
2 discussions and extensive interaction with Baltimore Gas &  
3 Electric on a template process for the format and content of  
4 an environmental report that would support an application.  
5 The goal of that process was to ensure that an environmental  
6 report when submitted would be considered suitable for  
7 further staff review as part of an actual application. So  
8 we weren't making determinations on the acceptability of the  
9 material contained therein, only acceptability of its scope  
10 associated with the staff's ongoing review.

11 We concluded that template process through a  
12 management meeting which took place on Thursday, June 5,  
13 where we provided our assessment to BG&E management that we  
14 thought the process had culminated in a format and content  
15 document that they had prepared that if they were to prepare  
16 an environmental report along those lines it would meet that  
17 requirement, namely that it would pass our acceptability  
18 review.

19 We've had interactions with NEI and Duke. With  
20 Duke with regard to the fact that they have under  
21 preparation an environmental report to support a possible  
22 application, and we've also talked with NEI with regard to  
23 their desires to consider the development of guidance for  
24 the industry in this area.

25 COMMISSIONER MCGAFFIGAN: Does that conclude the

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1 environmental part?

2 CHAIRMAN JACKSON: I think so.

3 Do you have a question?

4 COMMISSIONER MCGAFFIGAN: Can I ask a question?

5 CHAIRMAN JACKSON: Sure.

6 COMMISSIONER MCGAFFIGAN: I've gone back and  
7 looked at Part 51, and one of the issues that you've  
8 mentioned in the paper before us on page 7, an area that  
9 needs some clarification, and you're discussing it with  
10 industry, is the generic and cumulative impacts associated  
11 with transportation operation in the vicinity of a  
12 high-level waste repository site.

13 That's one of these category 2 items under the  
14 rule that was published. And it strikes me that sort of  
15 puts people in a pretty tough situation in that it probably  
16 should be dealt with generically maybe by ourselves. And so  
17 how do we get ourselves out of the fix that we're probably  
18 not going to deal with the generic transportation issues of  
19 Yucca Mountain for a few years yet, and yet some of these  
20 folks are on a time line to come in as early as late this  
21 year or next year? So do you have any thoughts as to how we  
22 deal with that issue? What has been the nature of the  
23 discussions?

24 MR. MATTHEWS: Yeah, based on our discussions with  
25 BG&E and with Duke, it is clear that that is probably, if

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1 there is an -- what appears at this point in time to be an  
2 issue that's unresolved in this area, although there are  
3 some other ones the resolution of which isn't completely  
4 clear, this one would be less clear than the others.

5           However, this situation was anticipated in  
6 conjunction with the approval of the final rule in December  
7 of last year. The staff and the Commission found themselves  
8 in the position of not having a sufficient generic analysis  
9 upon which to base a finding that this could be considered  
10 as a category 1 issue. However, the Commission expected,  
11 and they expressed in the statement of consideration, that  
12 as part of its efforts to develop regulatory guidance for  
13 this rule, the Commission would consider whether further  
14 changes to the rule are desirable to generically address the  
15 issue of cumulative transportation impacts. And that's  
16 exactly what the staff is going at this juncture.

17           CHAIRMAN JACKSON: So let me make sure -- so what  
18 is it that the staff is doing?

19           MR. MATTHEWS: I was going to move on to that.

20           COMMISSIONER MCGAFFIGAN: Well, we'll both let you  
21 go.

22           MR. MATTHEWS: The staff has obtained and is  
23 currently evaluating information from DOE which we  
24 anticipate will provide the basis for a generic analysis of  
25 cumulative effects of transportation in the vicinity of a

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1 high-level waste repository.

2           CHAIRMAN JACKSON: And are you going to bring a  
3 paper forth to the Commission on this?

4           MR. MATTHEWS: Yes, and in fact I will get to the  
5 issue of what options might be available.

6           CHAIRMAN JACKSON: Okay. Good.

7           MR. MATTHEWS: And certainly the Commission will  
8 be involved in the determination of the chosen one

9           COMMISSIONER MCGAFFIGAN: And what is the timing  
10 for --

11           MR. MATTHEWS: I wanted to make a comment that  
12 it's important, given that DOE has not yet issued an  
13 Environmental Impact Statement that would go the full  
14 distance in addressing this issue --

15           COMMISSIONER MCGAFFIGAN: And won't for some --

16           MR. MATTHEWS: For some time.

17           COMMISSIONER MCGAFFIGAN: Yes.

18           MR. MATTHEWS: We're of course concerned that we  
19 not act too precipitously, so we do want to have an analysis  
20 performed by the staff based on information that we receive  
21 from DOE as opposed to just quote "adopting" what they've  
22 provided. So we do want to do that.

23           COMMISSIONER MCGAFFIGAN: Is an option for dealing  
24 with the early appliers though -- this is something that  
25 obviously should be dealt with generically. We can't deal

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1 with it generically yet. Is this an area where we're going  
2 to have to use an exemption to -- or some sort of an  
3 approach --

4           MR. MATTHEWS: I think there's a potential for  
5 that. The staff really hasn't considered what the  
6 implications of granting an exemption in this area is, and  
7 we'll certainly consider it if the need arises.

8           CHAIRMAN JACKSON: Is that one of the options on  
9 your list?

10           MR. MATTHEWS: Yes. But I wanted to say we think  
11 that there's probably time to perform an analysis and  
12 proposed to you the possibility of an expeditious rulemaking  
13 that will resolve this issue.

14           CHAIRMAN JACKSON: I see.

15           MR. MATTHEWS: That was what was expected at the

16 time that the issue was not sufficiently dealt with in  
17 December, and our expectation is that provided the analysis  
18 of DOE's input and our analysis would provide a sufficient  
19 basis for that, that's the road that we'd like to go down.

20 COMMISSIONER MCGAFFIGAN: I've heard expeditious  
21 rulemaking --

22 [Laughter.]

23 COMMISSIONER DICUS: No, no, no, I have both of  
24 you on either side, so I don't have to worry about it.

25 No, I'm not clear on the timing in here. You

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1 said, you know, we have to wait -- we had to wait a little  
2 bit, you know, obviously with DOE and other things to get  
3 the Environmental Impact Statement and then you talk about  
4 an expeditious rulemaking, so I'm not --

5 MS. CYR: If I could say something, I mean the  
6 Commission and -- I mean, the obligation to examine this  
7 under NEPA is fundamentally ours, and we provide by  
8 regulation that licensees have to provide an environmental  
9 report to give us information basically that shortens our  
10 process, so, I mean, in a sense this is a slightly different  
11 situation if you were to quote "grant an exemption" if  
12 that -- in that context -- but what the Commission has done  
13 in the past is -- most notably in the waste confidence  
14 proceeding -- was where we had a generic issue that came up  
15 which the Commission decided that they wanted to address  
16 generically.

17 They just provided that during the proceeding that  
18 issue in the rulemaking you would not address it in  
19 individual license proceedings and this licensing proceeding  
20 would be subject to whatever the outcome of that generic  
21 proceeding was, so we at least -- we have a situation in the  
22 past where we have just provided that the individual actions  
23 would be subject to whatever the outcome of the action was,  
24 if in fact the license -- their proposal to amend the  
25 existing findings in part 51 didn't terminate prior to the

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1 time that you had an application come in.

2 MR. MATTHEWS: And I might clarify that I hope I  
3 didn't leave the impression we thought we needed to wait on  
4 DOE's final Environmental Impact Statement for us to review  
5 the issue and the associated environmental impacts, and we  
6 the NRC issue a generic document that would reflect the  
7 generic treatment of that issue short of DOE finalizing  
8 their activity. And that would be the document upon which a  
9 potential rulemaking would be potentially based. However,  
10 short of that, there might be an option of issuing such a  
11 generic environmental analysis that could be referenced by  
12 the utilities in individual environmental reports. But,  
13 again, the staff would then turn in development of their  
14 draft environmental impact statement of having to deal with  
15 that issue on a generic basis.

16 So that is why I made the comment exemptions,  
17 while we haven't considered them in detail, may not really  
18 be the option.

19 COMMISSIONER MCGAFFIGAN: Could I clarify?

20 What does expeditious rulemaking mean in this  
21 context?

22 MR. MATTHEWS: Well --

23 COMMISSIONER MCGAFFIGAN: I mean, when would it  
24 begin and when would it end, just approximately?

25 MR. MATTHEWS: I think that is the options that we

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1 would have to consider among us, NOGC, in terms of how



2 expeditious such a rulemaking could be performed.

3 COMMISSIONER MCGAFFIGAN: If I am a licensee  
4 listening to this discussion, BG&E or Duke, what am I to  
5 take away from it in terms of is this a problem for me or  
6 not and do I have to include very much on this in my draft  
7 report to the Commission or do I not?

8 MR. MATTHEWS: In the current regulatory arena  
9 with the regulation as it exists, they need to address this  
10 issue in the environmental report and address what's phrased  
11 the generic and cumulative impacts so there is an obligation  
12 for them to do that. However, as I explained with regard to  
13 the process, we then, as Karen has pointed out, we the staff  
14 then assume the obligation for doing a sufficient  
15 environmental review and so we can bring to that review  
16 additional information that we may develop as well.

17 CHAIRMAN JACKSON: I think perhaps a way to get at  
18 this is if you were -- well, let me ask two questions, a  
19 question and then make a comment.

20 When were you expecting to propagate the options  
21 paper to the Commission?

22 MR. MATTHEWS: Well, I have to admit that until I  
23 have a better feeling for when the staff can complete their  
24 environmental assessment of the information received by DOE,  
25 it is difficult for us to commit to what might be the next

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1 step and that was the difficulty I --

2 CHAIRMAN JACKSON: I think we need a couple of  
3 things from you. I think one is that we need to have that  
4 readout of when the staff can complete its review of DOE's  
5 environmental assessment and it's tied into what they are  
6 doing. But I think we also need a readout relative to  
7 various options that the Commission would have, but  
8 particularly one related to rulemaking.

9 We need to have some sense of what is possible in  
10 terms of speed and that may require input from OGC so we  
11 understand, you know, what the legal bounds are. And so if  
12 you could do that?

13 MR. MATTHEWS: That was the path we were headed  
14 upon and we will proceed expeditiously.

15 CHAIRMAN JACKSON: Sure, apace. Right. Thank  
16 you.

17 MS. SLOSSON: If we could go to the last slide?

18 In summary, the staff plans to focus its resources  
19 on the plant-specific and owners group reviews and  
20 applications if we receive it and use the information from  
21 those reviews to make sure that we have clear and concise  
22 guidance from the industry to use in pursuit of license  
23 renewal and in the development of that guidance, certainly,  
24 if we identify any policy issues, we will bring them forward  
25 to the Commission.

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1 CHAIRMAN JACKSON: Thank you.

2 Commissioner Rogers?

3 COMMISSIONER ROGERS: I don't have anything.

4 CHAIRMAN JACKSON: Commissioner Dicus?

5 COMMISSIONER DICUS: I have one more question.

6 I recognize at the onset this is not specifically  
7 related to license renewal but I am particularly interested  
8 in learning a little bit more about the subject so, for  
9 information purposes, I would like to bring it up. This has  
10 to do with EQ, which I recognize is an ongoing issue with  
11 operating plants and was taken out of the renewal bin for  
12 that reason, at least that is what I understand.

13 But what do you expect licensees or how do you  
14 expect licensees to address this in their renewal  
15 applications?

16 MR. HOFFMAN: Well, EQ, actually that generic  
17 issue was identified as part of the early license renewal  
18 reviews along with, like metal fatigue which is another  
19 generic issue that we have identified.

20 When we amended the rule, the statements of  
21 consideration talks about unresolved generic issues and it  
22 does state clearly that a renewed license can be issued with  
23 an unresolved issue. A couple options, it discusses like  
24 BG&E or Duke could use would be to -- they could come up  
25 with a plant-specific resolution of the issue or they could

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1 give us a more or less a justification of why they can  
2 continue to operate until some period in the future when  
3 they could then incorporate the final resolution.

4 We have been involved, you know, even though it  
5 has been taken out of more or less the license renewal's  
6 responsibility, we continue to be involved in the ongoing  
7 activities with research and the technical branches of NRR.

8 COMMISSIONER DICUS: How many unresolved generic  
9 safety issues are there?

10 MR. HOFFMAN: We are still looking at that. We  
11 are talking about -- well, unresolved generic issues that  
12 have to be addressed for renewal are only those that involve  
13 structures and components subject to the -- you know, within  
14 the scope of the rule and that involve aging effects. So we  
15 are talking passive, long-lived components with applicable  
16 aging effects. So it narrows it down quite a bit.

17 Some initial cuts show less than 10, in that  
18 ballpark. And some reviews have shown two. It depends on  
19 who is doing the review right now. So we haven't got that  
20 final list.

21 CHAIRMAN JACKSON: Okay, Commissioner Diaz?

22 COMMISSIONER DIAZ: Yes, let's see. Following on  
23 that question, I think aging is the key issue on relicensing  
24 versus not the matter of aging but aging gracefully, that  
25 whole issue.

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1 [Laughter.]

2 COMMISSIONER DIAZ: A concern that some of us have  
3 of late. But, you know that I think it is important to, and  
4 I don't quite see though, how are we developing the body of  
5 knowledge necessary to systematically use some criteria to  
6 determine the degradation, not aging, per se, as a  
7 degradation of safety systems. Instead, is that process  
8 being developed with significant focus?

9 MR. HOFFMAN: There have been a number of  
10 activities. To clarify, we are looking at the aging  
11 effects.

12 COMMISSIONER DIAZ: Aging means degradation due to  
13 aging, right?

14 MR. HOFFMAN: Right.

15 We are looking at the effects as opposed to the  
16 mechanisms themselves because we want to ensure the  
17 functionality of structures and components.

18 There -- and the intent is that we maintain that  
19 functionality in accordance with the current licensing basis  
20 and, in particular, the design basis. So that when you are  
21 looking at the effects of aging in a number of areas, you do  
22 go back and see what the design intent is and ensure that  
23 function can be maintained.

24 There have been some additional -- it's really,

25 like before, in renewal, everything seems to be kind of

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1 interrelated. The NUMARC reports in which they did some  
2 studies on specific structures and components have added to  
3 it, the Office of Research has had their Nuclear Plant  
4 Research -- I forget the exact name of it, that they have  
5 been developing. There was a generic aging lessons learned  
6 document that has been produced.

7 So we are pulling all of that data in as part of  
8 this ongoing process and looking at it.

9 COMMISSIONER DIAZ: And are we starting to assume  
10 some criteria of pass, no pass, going to watch it? I mean,  
11 there should be some body of knowledge that we develop  
12 systematically that will not only allow us to look at the  
13 first one but will actually allow us to, in a critical  
14 manner, analyze the functionality and/or potential  
15 continuing effects. Because I think aging becomes the  
16 critical component of the process; is that correct?

17 MS. SLOSSON: Aging is the critical part of the  
18 license renewal review we do for the passive, long-lived  
19 components. So we are evaluating and developing guidance  
20 for how the staff will look at and what criteria will we use  
21 to determine if an aging management program is effective.  
22 So that is being done as part of the regulatory guidance  
23 development.

24 MR. HOFFMAN: And the Standard Review Plan will  
25 be, for the components and structures looked at, it will

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1 contain specific guidance as to --

2 COMMISSIONER DIAZ: I think that body of knowledge  
3 is critical to the entire process, to maintain it and  
4 upgrade it and develop it to a point that will be useful in  
5 a continuous manner because you are going to go back to it  
6 over and over again.

7 CHAIRMAN JACKSON: Commissioner McGaffigan?

8 COMMISSIONER MCGAFFIGAN: Given how much time was  
9 devoted to the last question that was spurred by this  
10 sentence, I am not sure I want to keep going on it, but  
11 there is a list of other issues other than transportation  
12 issues that you have been discussing with the industry and  
13 the sentence that follows says, good progress has been made  
14 on these issues and dialogue continues.

15 Are any of the other issues on the list, do they  
16 rise to the same level that the transportation issue rises  
17 to in terms of possibly involving Commission guidance or  
18 whatever?

19 MR. MATTHEWS: Not based on what discussions we  
20 have had to date.

21 CHAIRMAN JACKSON: Well, I would like to thank the  
22 NRC staff for providing a very informative briefing to the  
23 Commission regarding activities associated with the  
24 implementation of the license renewal rule. It was  
25 important in 1994, when the Commission directed the staff to

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1 revise the rule and it is just as important today that the  
2 Commission provide a stable and predictable license renewal  
3 process.

4 So I commend the staff for its perseverance in  
5 these license renewal efforts and the staff should continue  
6 to work with the nuclear power industry to resolve the  
7 technical and other implementation issues. And, as you have  
8 heard and you have heard specific ones, should the staff  
9 identify policy issues associated with the license renewal

10 rule implementation or with the environmental related  
11 requirements contained in 10 CFR Part 51, the staff should  
12 forward these issues promptly to the Commission for timely  
13 resolution along the lines that we have already discussed.

14 So, unless my fellow commissioners have any  
15 further comments, we are adjourned.

16 [Whereupon, at 2:36 p.m., the briefing was  
17 concluded.]

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