



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

October 16, 2014

MEMORANDUM TO: Steve Bloom, Chief
Subsequent Renewal, Guidance,
and Operations Branch
Division of License Renewal
Office of Nuclear Reactor Regulation

FROM: Evelyn H. Gettys, Project Manager */RA/*
Subsequent Renewal, Guidance,
and Operations Branch
Division of License Renewal
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE MEETING BETWEEN THE U.S. NUCLEAR
REGULATORY COMMISSION STAFF AND THE NUCLEAR
ENERGY INSTITUTE TO DISCUSS CURRENT LICENSE
RENEWAL TOPICS

The U.S. Nuclear Regulatory Commission (NRC) staff and representatives of the Nuclear Energy Institute (NEI) met on September 18, 2014, to discuss various topics on license renewal. The agenda and slide presentations are available in the NRC's Agencywide Documents Access and Management System (ADAMS) under Accession No. ML14261A207. Enclosure 1 is a list of the meeting participants.

A summary of the meetings discussion follows:

1. Update on Continued Storage Rule

On August 26, 2014, the Commission approved a revision to Title 10 of the *Code of Federal Regulation* (CFR) 51.23 (Continued Storage Rule) on the environmental impacts of continued storage of spent nuclear fuel. The Commission also lifted the suspension of final licensing actions on nuclear power plant licenses and renewals once the rule becomes effective. The Continued Storage Rule adopts the environmental impacts determined in a generic environmental impact statement (NUREG-2157) for storing spent nuclear fuel at any reactor site after the reactor's licensed term of operations.

The Commission's actions complete the end of a two-year effort to satisfy a remand by the U.S. Court of Appeals for the District of Columbia Circuit which struck down the NRC's 2010 revision of its Waste Confidence Decision and rule (10 CFR 51.23).

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2. License Renewal Schedules

The NRC gave an overview of the schedule changes to the in-house license renewal applications that have been impacted by the hold, placed by the Commission, on the issuing of license renewal licensing while the staff work on the Continued Storage Rule.

3. The Commission's Staff Requirements Memorandum to the Staff on SECY-14-0016

In the Staff Requirements Memoranda (SRM) on SECY-14-0016 dated August 29, 2014 (ADAMS Accession No. ML14241A578), the Commission approved Option 1, no changes to the existing 10 CFR Part regulations. The SRM directs staff to continue updating the license renewal guidance, submit an information paper to the Commission by the end of 2015 and report to the Commission on resolving the technical issues.

4. Industry Perspective on SRM to SECY-14-0016

NEI discussed their perspective on the August 29, 2014 SRM and expressed that there was agreement with the Commission on the strength of the existing Part 54 rule and that it was good for operation beyond 60 years without any additional rulemaking changes.

5. Comments on the NEI draft guidance on "Use of Industry Operating Experience for Age-Related Degradation" and "Aging Management Programs and Aging Management Program Effectiveness."

At the July 29, 2014, NEI workshop with the staff, NEI provided drafts of guidance documents for operating experience and aging management program (AMP) effectiveness. NEI also performed tabletop exercises to demonstrate how operating experience would be used to inform changes to plants' AMPs. The staff asked questions during the tabletop, and as an action item committed to providing additional comments and questions at a later date. The staff provided its initial comments and questions during the September 18, 2014 meeting.

On October 8, 2014, the staff and NEI had a teleconference to discuss additional comments from the staff concerning the draft documents. Those comments are provided in Enclosure 2.

6. Discussion with the Regions on License Renewal Topics

The status report concerning the Reactor Oversight Process Enhancement Project with respect to incorporating aging management guidance into existing baseline inspection procedures, and provided awareness to the industry that Headquarters and the Regions had discussions on the purpose and scope of a recently issued generic communication, Regulatory Issue Summary 2014-09, "Maintaining the Effectiveness of License Renewal Aging Management Programs."

7. GALL Industry Panel Status

NEI discussed some of their Subsequent License Renewal (SLR) activities that they are currently working on. These activities are of great importance to the NRC since the NRC will be referencing in the GALL-SLR some of the documents that NEI are currently working on, such as, 60 year analysis in technical documents, revised the Selective Leaching AMP and access to industry documents.

8. Use of EPRI Documents in the GALL Revision

Electric Power Research Institute (EPRI) stated that they will work with the NRC on a case-by-case basis for the use of portions of industry documents which NRC needs EPRI's approval to use in the GALL-SLR.

The NRC may reference these documents; however, the issue becomes one of public transparency since the public does not own the rights to those documents.

9. New Topics

NEI discussed their thoughts on approaches to updating their document NEI 95-10 "Industry Guidelines for Implementing the Requirements of 10 CFR Part 54 the License Renewal Rule." At this time they are expecting to produce a straw man version of this document to come out in 2021.

10. Action Items

- a. NRC and NEI are to continue their discussion on the industry's two draft guideline documents on operating experience and AMP effectiveness self-assessment.
- b. NRC to provide schedule updates to GALL-SLR and SRP-SLR.
- c. NEI and EPRI will work with the NRC on a case-by-case basis to review requests for certain portions of EPRI documents to be made publically available to support the SLR expert panels. Also as an ongoing effort EPRI will be revising documents to address operations from 60 to 80 years.
- d. NRC and NEI will consider having a separate meeting on the draft Selective Leaching AMP after the NEI Mechanical Working Group Review releases the document to the NRC.

11. Public Participation

No one from the public participated

Enclosures:

1. Attendance List
2. Additional NRC Staff Comments on NEI Draft

cc w/encl: Reactor License Renewal Stakeholder Group Listserv

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DISTRIBUTION: See next page

ADAMS ACCESSION No: ML14272A117

*concurred via e-mail

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AHull, RES

SStuchell, NRR

**Meeting between the U.S. Nuclear Regulatory Commission Staff and the
Nuclear Energy Institute to Discuss License Renewal Topics
September 18, 2014**

Attendance List

NAME	AFFILIATION
Chris Miller	NRC
John Lubinski	NRC
Michael Marshall	NRC
Evelyn Gettys	NRC
Steve Bloom	NRC
Butch Burton	NRC
Allen Hiser	NRC
Bennett Brady	NRC
Araceli Billoch	NRC
John Wise	NRC
Yoira Diaz	NRC
Tom Boyce	NRC/RES
John Daily	NRC
Makuteswara Srinivasan	NRC
Richard Tilley	EPRI
Jason Remer	Nuclear Energy Institute (NEI)
John O'Rourke	RSEG Nuclear
Mike Franklin	Duke Energy
Eric Blocher	STARS
David Clohecy	Exelon
Alan Cox	Entergy
Terry Herrman	Structural Integrity
Richard Reister	DOE

Additional NRC Staff Comments on NEI Draft: “Use of Industry Operating Experience for Age-Related Degradation and Aging Management Programs”

Number	Comment
1	Throughout the document, NEI should clarify that this guidance only deals with operating experience pertaining to age-related degradation of passive, long-lived components. (Ex: Executive Summary: “...pertaining to age-related degradation <i>of passive, long-lived components</i> with the goal of...” Executive Summary: “ <i>Age-related</i> degradation <i>of passive, long-lived components</i> is currently....”
2	Second sentence of paragraph 3 in Exec Summary: Again, should specify age-related degradation of passive, long-lived components. Saying “age-related OE” could make it pertain to all age-related issues (active components included).
3	Page 5 second bullet (second sub-bullet): What does “Trend resulting in increased sample size for one-time inspection” mean?
4	Page 5 general comment: Are there thresholds for reporting this plant-specific OE? Where would it be reported?
5	Page 5: Again, we should stick to age-related degradation of passive, long-lived components.
6	Page 6 first sentence: “Entry into the OE review process is <i>accomplished via</i> the...”
7	Page 6 last paragraph: Again, need to specify that satisfaction of the above requirements on page 6 means you can identify it as “age-related degradation of a passive, long-lived component” since age-related degradation can also apply to active components. This specificity is needed because there is additional industry (and NRC) interest in age-related active component failures.
8	Page 7: Are these criteria going to be added to INPO 12-009? They are not currently in there.
9	Page 8: INPO 12-009 (Rev 5, August 2014) does not have this revised reporting criterion in it, yet the NEI document states that INPO 12-009 has been revised with the added criterion for age-related degradation. If and when this criterion is added to INPO 12-009, it should also specify that it applies to age-related degradation <i>of passive, long-lived components</i> .
10	Attachment 1: The flowchart is misleading to the reader. It makes it seem like the only OE that qualifies as age-related is passive, long-lived component issues. INPO 12-009 already contains criteria for categorizing aging issues. Specifically, at the bottom of page 63 under aging/obsolescence concern. This is a specific tag available in ICES. So, while the second part of the red block on Attachment 1 is technically accurate (“Follow OE guidelines IAW INPO 12-009”) I think the first sentence makes it misleading because it says not to identify this OE as Age-Related Degradation when in fact it is.

**Additional NRC Staff Comments on NEI Draft:
“Aging Management Program Effectiveness”**

Number	Comment
1	Page 7, section 4.10, first sentence should read: “Following AMP implementation, industry operating experience and plant operating history, including corrective actions, are used to inform AMPs.”
2	Page 7, section 4.10(a): delete “for aging related”
3	Page 7, section 4.10(c): Delete
4	Page 8: There should just be one sentence on this page: “A licensee should continue to use its existing site procedures to perform a review of plant-specific and industry operating experience The remainder of the information on the page does not really fit. It implies that there is some separate OpE program for AMPs when this is not the case.
5	Page 9: The first two sentences should stay. The rest of the page, which paraphrases LIC 105, adds little value and runs the risk of becoming inaccurate guidance if and when LIC 105 is revised. It is better to just reference this document instead.