



License Renewal Application Review Process

STARS Alliance Perspectives

Regulatory Information Conference
March 2011



Strategic Teaming And Resource Sharing (STARS) Alliance Member Locations



STARS Alliance - formed in 2000
 • All Pressurized Water Reactors
 • All in Region IV
 • Earliest license expiration - 2022

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STARS License Renewal Strategy

- Station Project Team
 - Retains overall ownership of LRA
 - Facilitates station reviews and ownership of LRA products
 - Provides opportunity for knowledge transfer
- Plant Aging Management Center of Business
 - Loaned employees from each station located at PAMCOB
 - Contractor staff supplements utility staff
 - Post-submittal – support for audits, inspections, RAIs, SER Reviews, and ACRS meetings
- Standard process / tools for application development
- Use of web portal to facilitate NRC review of application

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 **STARS License Renewal Strategy**

- Daily teleconference among COB and station PMs
- Active engagement in industry groups and at other station audits / inspections / peer reviews
- Philosophy: Implement Aging Management Programs now (to extent practical) to capture lessons-learned
- Staggered submittals to optimize NRC / COB resources

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 **LRA STATUS**

- **Wolf Creek** - Renewed License Issued Nov 2008
- **Palo Verde** - Submitted LRA Dec 2008; Full ACRS Committee February 2011; Renewed License April 2011
- **Diablo Canyon** – Submitted LRA Nov 2009; ACRS Subcommittee held February 2011
- **South Texas** – Submitted LRA Oct 2010; Sufficiency Review completed; Audits scheduled for May/June
- **Callaway** – LRA production ongoing; late 2011 submittal
- **San Onofre** – LRA production began 2011
- **Comanche Peak** – Project to start in 2012

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 **LRA Review Process Observations**

- Resource / Schedule predictability
- Audit / Inspections
- Walkdowns
- RAI Activities
- Generic issues resolution

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 **Resource/Schedule Predictability**

- Challenges remain with our ability to predict resource needs
 - Palo Verde review schedule impacted by continuing resolution
 - GALL Rev 2 changes, NRC backlog, emerging technical issues, station impacts to schedules
- STARS schedule - three LRAs in NRC review
- Balance production and review activities
- Flexibility needed by all parties

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 **Audits / Inspections**

- Face to Face interactions most effective means of communication
- Addressing AMP exceptions during audit week
- TLAA needs separate interaction (either at station or headquarters)
 - February meeting – positive step
- Region IV inspections consistent performance, predictable schedules

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 **Walkdowns**

- NRC staff performs these very well!
- STARS stations – improvement opportunity
- Earlier, more frequent, better focused
- Target areas
 - Non-safety / safety interactions
 - Confirmation of design information
 - Finding unique design / licensing aspects that the information reviews might miss

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 **RAI Activities**

- Process Improved
 - Draft RAIs at end of audits
 - Communication to ensure understanding
 - Agreement on information needed can be challenge
 - Aggressive response schedules
- Other recommendations will provide substantive improvement

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 **Generic Issue Resolution**

- Not where it needs to be.....
 - Timely, consistent treatment lacking
 - Issues will continue to emerge
- Recommend implementing a more defined process when potential generic issue identified
 - Engage "in-review" stations through NEI
 - Define generic interim solution / commitment
 - Clearly define needs/plans to address long-term
 - Issue resolution through existing process (ISGs, GALL revision)
 - Address through Part 50 process for stations that have renewed license

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