



RIC 2012 NRC Perspectives on License Renewal Operating Experience

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March 15, 2012

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Agenda

- Status of License Renewals
- Need for Aging Facilities to Address Operating Experience
- Interim Staff Guidance on Operating Experience (LR-ISG-2011-05)

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Status of License Renewals

- Renewed licenses: 71 units (41 sites)
- Applications in review: 15 units (11 sites)
- Last application expected: Early 2017
- In period of extended operation (PEO): 9 units (8 sites)
- Entry into the PEO in 2012: 6 units (5 sites)
- Entry into the PEO in 2013: 11 units (10 sites)
- Entry into the PEO in 2014: 13 units (13 sites)

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Operating Experience

- Operating Experience (OE) is one of ten essential Aging Management Program (AMP) elements reviewed during license renewal (LR)
- AMPs should continue to be informed and enhanced based on ongoing review of plant-specific and industry OE
- Why the Emphasis on OE?
 - Recent "Hot Topics" & Developing Issues
 - Better documentation needed in applications
 - Limited experience with AMP Implementation
 - Implications for subsequent renewals

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Recent "Hot Topics"

Buried and Underground Piping and Tanks

- Issued new AMP XI.M41 in GALL Report Rev 2
- Interim Staff Guidance (ISG) being developed to address plants without cathodic protection

Inaccessible non-EQ Cables

- Updated XI.E3 in GALL Report Rev 2
- Expanded scope to include cables ≥ 400 volts and non-energized cables
- Changed inspection and testing frequencies

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Developing Issues

- Selective Leaching
- Concrete Alkali Silica Reaction (ASR)
- Containment Concrete
- Wall thinning mechanisms other than flow-accelerated corrosion

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Better Documentation Needed in Applications

- Applicants need to improve identification of OE in AMP descriptions
 - New programs typically only contain general description of OE without specifics
 - OE description should include discussions of Condition Reports, responses to generic communications, industry OE gained from other licensee implementation, etc.
- Basis documentation needs to include thorough consideration of various sources of OE and/or changes to existing procedures
- Applications should clearly state how applicants intend to consider OE to manage AMPs on ongoing basis

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License Renewal Interim Staff Guidance – LR-ISG-2011-05, “Ongoing Review of Operating Experience”

Milestone	Date
Issued draft LR-ISG-2011-05 for public comment	August 24, 2011
Extended comment period	September 20, 2011
Held public meeting	October 12, 2011
Comment period ended	October 23, 2011
Re-issued draft LR-ISG-2011-05 for public comment	November 25, 2011
Subsequent comment period ended	December 15, 2011
Issued final LR-ISG-2011-05	March 2012

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License Renewal Interim Staff Guidance – LR-ISG-2011-05, “Ongoing Review of Operating Experience”

- Clarifies staff's acceptance and review procedures for OE to ensure the effectiveness of the license renewal AMPs
 - Consideration of different sources of OE
 - Identification and evaluation of OE related to aging
 - Determination of when AMPs need to be modified based on OE
 - Evaluation and consideration of OE on an ongoing basis

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Why Emphasis on Operating Experience?

- Only 9 of 71 units have entered the PEO
 - Anticipate more lessons learned as numbers in PEO ramp up
 - Need effort and evidence from industry of AMP effectiveness in implementation (e.g., Implementation Working Groups, INPO initiatives?)
- Maintenance of AMP through OE is important if subsequent renewal to be considered viable option

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