

**NRCREP Resource**

**From:** Boyd Taylor [boyd.taylor@pnl.gov]  
**Sent:** Tuesday, June 08, 2010 4:35 PM  
**To:** NRCREP Resource  
**Subject:** Response from "Comment on NRC Documents"

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Boyd Taylor ([boyd.taylor@pnl.gov](mailto:boyd.taylor@pnl.gov)) on Tuesday, June 08, 2010 at 16:35:06

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Comments: A specific "numbered" sub section should be added to AMP descriptions that defines a nominal implementation schedule of the AMP. Citing a standard or standards upon which the applicant can (and NRC for that matter) can derive a schedule can lead to ambiguity when validating completion of commitment.

A nominal implementation schedule should indicate. The minimum number of times the AMP should be executed in the period of extended operation. The earliest and latest time the applicant can initiate the the first implementation and the minimum and maximum interval of time between implementations during the extended period of operations.

Example: Under normal conditions and results of previous implementations (if applicable) meet expectations. The AMP should be implemented 4 times during the period of extended operations. The AMP should not be executed within the first 2 years of extended operation and the interval between implementations should not be less than 3 years or exceed 4 years.

Likewise any applicant proposing a Plant Specific or GALL AMP with modifications must describe an implementation schedule that is "auditable" with the assumption that positive and expected results occur for each implementation.

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