

March 28, 2002

MEMORANDUM TO: Christopher I. Grimes, Program Director
License Renewal and Environmental Impacts Program
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Jimi T. Yerokum, Inspection Team Leader
Division of Reactor Safety
Region I

FROM: Bruce A. Boger, Director
Division of Inspection Program Management
Office of Nuclear Reactor Regulation

Wayne D. Lanning, Director
Division of Reactor Projects
Region I

SUBJECT: PEACH BOTTOM LICENSE RENEWAL INSPECTIONS

Attached is the final version of the Peach Bottom Atomic Power Station License Renewal Inspection Plan. The plan, which was developed jointly by NRR and Region I, is hereby approved. You are directed to use this plan to prepare and conduct the license renewal inspections at Peach Bottom.

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Bruce A. Boger, Director
Division of Inspection Program Management
Office of Nuclear Reactor Regulation

Date: 3/28/02

RVCrlenjak for
Wayne Lanning, Director
Division of Reactor Safety
Region I

Date: 3/27/02

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Distribution: See next page *See previous concurrence

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LICENSE RENEWAL INSPECTION PLAN

PEACH BOTTOM UNITS 2 AND 3

I PURPOSE

This inspection plan specifies the methods for implementing NRC Manual Chapter 2516, "Policy and Guidance for the License Renewal Inspection Program," inspection activities requirements relating to 10 CFR Part 54 (herein referred to as "the rule") and the Peach Bottom Atomic Power Station (PBAPS) Units 2 and 3 license renewal application (LRA). This plan defines the scope of the inspections planned to verify that the PBAPS license renewal program is in compliance with the requirements of the rule and is consistent with the Exelon Generating Company, LLC (Exelon) LRA and the staff's safety evaluation of the LRA. The plan also provides guidance for inspection scheduling, inspector training, inspection activities, and resource requirements.

The Exelon LRA identified, in the scoping results, the systems, structures, and components (SSCs) that Exelon determined were within the scope of the rule. Enclosure 1 lists the structures and systems that the inspection team has chosen to inspect on the basis of their risk significance, uniqueness to PBAPS, and current issues. However, the scope and depth of inspections of these systems may vary.

II OBJECTIVES

The overall objective of this plan is to provide guidance for inspecting the implementation and effectiveness of the programs and activities associated with Exelon's license renewal program. The inspection will verify that there is reasonable assurance that the systems, structures, and components required under 10 CFR 54.4, and the structures and components subject to an aging management review required under 10 CFR 54.21(a)(1) have been identified. The inspection will also verify that there is reasonable assurance that the effects of aging will be adequately managed such that the intended function(s) of structures and components requiring an aging management review will be maintained consistent with the current licensing basis during the period of extended operation. The license renewal inspection plan will be implemented at PBAPS before its license renewal application is approved to verify that Exelon meets the requirements of the rule and has implemented license renewal programs and activities consistent with the rule, their application, and the staff's safety evaluation report (SER).

III INSPECTION ACTIVITIES AND SCOPE

Inspection Procedure (IP) 71002, "License Renewal Inspections," will be the primary procedure used to inspect Exelon's implementation of the requirements of the rule. IP 71002 is included for ready reference as Enclosure 2.

The PBAPS license renewal inspection activities will be implemented through two site inspections, and if determined to be warranted, a third inspection to follow up on open items.

1. **Scoping and Screening Inspection** - The first inspection will consist of two weeks inspection, mainly in Exelon's cooperate headquarters, with one interim week in the regional office to review document obtained from Exelon during the previous week, write interim report, and adjust inspection plan, if necessary. The inspection will focus on the scoping and screening processes to verify that they have been implemented consistent with the rule, Exelon's methodology, and the staff's safety evaluation of Exelon's methodology. This inspection will verify that Exelon implemented the scoping and screening methodology consistent with the license renewal application and that the systems, structures, and components required by the rule have been included in the scope of license renewal. The inspection will also verify that there is reasonable assurance that Exelon identified all the passive and long-lived systems, structures, and components requiring an aging management review. Using PRA insights, a representative sample set of at least 30 percent of the systems, structures, and components, included by Exelon within the scope of license renewal, have been chosen for examination during this inspection. The inspection also includes a sample of systems and structures that Exelon excluded from the scope of the rule to verify that exclusion was appropriate. The inspection will examine features unique to the plant, and previous plant operating history. The systems and structures to be inspected are identified in Enclosure 1.

2. **Aging Management Review Inspection** - The second inspection will consist of two weeks on-site inspection, with one interim week in the regional office, and will focus on the aging management review portion of the license renewal application. In the license renewal application process, Exelon was required to identify all applicable aging effects for the structures and components subject to aging management review and within the scope of the rule. For each structure and component requiring an aging management program, Exelon was required to demonstrate that the effects of aging will be adequately managed so there is reasonable assurance that the intended function will be maintained consistent with the current licensing basis throughout the period of extended operation.

The inspection team will inspect the aging management programs for approximately half of the aging effects in each of the systems and structures listed in Enclosure 1. The inspection team will examine records for existing aging management programs to evaluate their effectiveness and review plans for planned new aging management programs.

The inspection team will also conduct walk downs of accessible portions of the systems and structures to identify any observable inconsistencies with the scoping and screening activities and any aging effects on the systems, structures and components that are not covered in the license renewal application.

3. **Open Item Inspection** - If the Regional Administrator decides that based on the issues or items identified in the above two inspections another inspection is necessary, then a third inspection will be conducted to follow-up on the open issues or items. The inspection will also inspect Exelon actions on open items remaining from the staff's safety evaluation report on the license renewal application. This inspection will also focus on any portion of the license renewal application updated by Exelon as a result of plant modifications. The third inspection report will document the need for any future follow-up inspections.

IV INSPECTION SCHEDULE

4. Scoping and Screening Inspection

Preparation Week	April 08 - 12, 2002
Onsite Inspection	April 15 - 19, 2002
	April 29 - May 03, 2002
Documentation Week	May 06 - 10, 2002

5. Aging Management Review Inspection

Preparation Week	July 01 - 05, 2002
Onsite Inspection	July 08 - 12, 2002
	July 22 - 26, 2002
Documentation Week	July 29 - August 2, 2002

6. Open Item Inspection

To be determined

V PREPARATION

Inspectors will familiarize themselves with the requirements and guidance relating to license renewal. Inspectors should familiarize themselves specifically with the license renewal application and associated safety evaluations performed by the staff for Peach Bottom. License renewal requirements and guidance documents that should be reviewed prior to an inspection include:

1. 10 CFR Part 54, "Requirements for Renewal of Operating Licenses for Nuclear Power Plants";
2. The statements of consideration published with the revision to the rule in the Federal Register, Vol. 60, No. 88, Monday, May 8, 1995, pages 22461 to 22495;
3. Regulatory Guide 1.188, "Standard Format and Content for Applications to Renew Nuclear Power Plant Operating Licenses," July 3, 2001:
4. Nuclear Energy Institute Guideline 95-10, Revision 3, "Industry Guideline for Implementing the Requirements of 10 CFR Part 54 - The License Renewal Rule," March 2001; and
5. NRC approved positions relating to license renewal.

In addition, each inspector should receive training on the license renewal inspection program, the PBAPS license renewal application, and the staff's safety evaluation of the application. This training should be provided before or during the during the preparation week for the Scoping and Screening team inspection.

VI ADMINISTRATIVE

The following inspection report numbers have been assigned to the Peach Bottom Atomic Power Station license renewal inspections:

Scoping and Screening Inspection: IR 2002-009

Aging Management Review Inspection: IR 2002-010

NRC inspectors should charge inspection hours using the inspection report numbers listed above and one of the following IPE codes:

LRP License Renewal Preparation/Documentation
LRI License Renewal Inspection
LRT License Renewal Inspection Travel

The Peach Bottom Atomic Power Station Units 2 and 3 docket numbers are 50-277 and 50-278 respectively.

VII INSPECTION RESOURCES

The following resources should be dedicated to the first two team inspection efforts:

1. Inspectors

- One team leader
- Four regional based inspectors
- One or more support staff from program office

2. Inspector Skills

The inspection team needs a cross-section of skills, including mechanical, material, civil, and electrical engineering skills.

3. Resources Estimate

Regional Inspectors

DIE: 610 hours
PREP and DOC: 730 hours

Support Staff (Program Office/Other region)

DIE: 70 hours
PREP and DOC: 80 hours

The scope of the third inspection will depend on the number and type of the issues remaining from the previous inspection activities. Therefore, resources and inspector skills needed for the third inspection will be determined when the inspection is scheduled. FTE will need to be allocated to Region I in FY 2003 to accomplish this inspection.

4. Enclosures:

- 1 Structures/Systems Selected for Inspection
- 2 Inspection Procedure 71002, "License Renewal Inspections."
- 3 Acronyms

Enclosure 1

**Peach Bottom Atomic Power Station License Renewal Inspection
Structural/Systems Selected for Inspection**

Mechanical Systems Within Scope of License Renewal	
Description	Comment
Auxiliary Systems	
Standby Liquid Control System	
High Pressure Service Water System	
Emergency Service Water System	
Emergency Diesel Generator	
Diesel Generator Building Ventilation System	
Reactor Coolant System	
Reactor Pressure Vessel and Internals	
Reactor Recirculation System	
Engineered Safety Features System	
High Pressure Coolant Injection	
Primary Containment Isolation System	Includes containment boundary piping and components from out-of-scope systems which interface with the primary containment.
Reactor Core Isolation Cooling System	
Residual Heat removal System	
Core Spray System	
Steam and Power Conversion System	
Feedwater System	Portions of the system required to support HPCI and RCIC injection flowpaths, reactor coolant pressure boundary and primary containment boundary are the only parts of feedwater included in scope.

Mechanical Systems Not in Scope of License Renewal	
Description	Comment
Auxiliary Systems	
Reactor Building Closed Cooling Water System	Piping and components associated with the primary containment boundary are included with PCIS.
Reactor Water Clean-up System	RWCU system piping and components inside containment are included with Reactor Recirculation System. RWCU containment penetration piping and components are included with PCIS.
Instrument Air System	Piping and components associated with the outboard main steam isolation valve air accumulator pressure boundary are included with the main steam system. Piping and components associated with safety grade instrument gas system pressure boundary are included with the safety grade instrument gas system. Piping and components associated with nitrogen backup to the battery and emergency switchgear ventilation system are included with the battery and emergency switchgear ventilation system.
Engineered Safet Features System	
Drywell Ventilation System	

Electrical and I&C Systems Within Scope of License Renewal	
Description	Comments
4 Kv	
480 V Emergency Load Centers	
480 V Emergency Motor Control Centers	
Station Blackout	
Reactor Protection System	
DC System	

Electrical and I&C Systems Not in Scope of License Renewal	
Description	Comments
13 Kv	Equipment credited for Fire Safe Shutdown and Station Blackout are included in those systems.
480 Volt Load Centers	
Cathodic Protection	

Structures Within Scope of License Renewal	
Description	Comments
Containment Structure	
Reactor Building Structure	
Emergency Cooling Tower and Reservoir	
Station Blackout Structures and Foundations	
Yard Structures	
Emergency Diesel Generator Building	

Structures Not in Scope of License Renewal	
Description	Comments
Dewatering Building	
Discharge Control	
Intake Screen	

NRC INSPECTION MANUAL

RLSB

INSPECTION PROCEDURE 71002

LICENSE RENEWAL INSPECTION

PROGRAM APPLICABILITY: IMC 2516

FUNCTIONAL AREA: OTHER

71002-01 INSPECTION OBJECTIVES

01.01 To verify the applicant's license renewal program, including supporting activities are implemented consistent with the requirements of Title 10 of the *Code of Federal Regulation (10 CFR)*, Part 54, "Requirements for the Renewal of Operating Licenses for Nuclear Power Plants", hereinafter referred to as the "rule", the applicant's license renewal application (LRA), and the NRC's safety evaluation report (SER).

01.02 To verify the material condition of the systems, structures and components (SSCs), that require an aging management review, are maintained consistent with the rule, the applicant's license renewal program, and the requirements of 10 CFR, Part 50.

01.03 To verify the information and documentation required by, or necessary to document compliance with the provisions of the rule are retrievable, auditable and consistent with the rule and site-approved programs and procedures.

01.04 To verify the implementation of license renewal plant assessment and aging management programs are consistent with NRC guidance for license renewal including the statements of consideration (SOC) that accompanied the rule (60FR22461, published May 8, 1995); draft Regulatory Guide DG-1047, "Standard Format and Content for the Application to Renew Nuclear Power Plant Operating Licenses," dated August 1996; and the draft license renewal standard review plan (SRP-LR), "Standard Review Plan for the Review of License Renewal Applications for Nuclear Power Plants," dated April 21, 2000, and other staff guidance documents.

71002-02 INSPECTION REQUIREMENTS

DEFINITIONS

Passive Structures and Components (SCs) Structures and Components which perform an intended function without moving parts or without a change in configuration, change in properties, or change of state. These may include SCs which are classified as inherently reliable under the maintenance rule, or SCs for which aging degradation is not readily monitored.

Long-lived Structure and Components Structures and components which are not subject to replacement based on a qualified life or specified time period.

Applicable Aging Effect An effect, related to an SC because of its design, configuration, material makeup, and environment, that if not prevented or mitigated, will result in degradation that will affect the component's ability to perform its intended function

Plausible Aging Effect An effect, related to an SC, under generally applicable conditions, having the potential for affecting the SC's ability to perform its intended function.

Current Licensing Basis(CLB) As defined in 10CFR54.3, CLB is the set of NRC requirements applicable to a specific plant and a licensee's written commitments for ensuring compliance with and operation within applicable NRC requirements and the plant-specific design basis (including all modifications and additions to such commitments over the life of the license) that are docketed and in effect.

02.01 General Inspection Requirements

a. The License Renewal Inspections (LRIs) verify:

- 5. The applicant implements the scoping and screening methodology in conformance with descriptions contained in the LRA and SER.**
- 6. The applicant correctly and completely identifies the SSCs satisfying the conditions of 10 CFR 54.4(a).**
- 7. The passive, long lived SSCs are subject to an aging management review, and have aging management programs that are in conformance with descriptions contained in the LRA and SER.**
- 4. The engineering analysis documentation used to support the application exists, is credible and auditable. The inspections will review the documentation associated with the applicant's implementation of the scoping, screening, aging management, and annual update process for the systems, structures, components, and commodity groups within the scope of the LRA to verify that the information and documentation required by, or otherwise necessary to document compliance with, the provisions of the rule are being maintained in an auditable and retrievable form consistent with NRC and staff approved guidance for license renewal, and site-approved programs and procedures.**

b. LRIs are performed prior to the approval of a renewed license. LRIs should be performed by NRC regional offices including visits to the applicants' site. The inspections will cover Scoping and Screening, Aging Management, the annual LRA update process and any open items resulting from inspections or staff review of the LRA.

Prior to performing inspections the Regional Inspection Team Leader should develop the elements of the site specific LRI inspection plan with assistance from License Renewal and Standardization Branch (RLSB) and others if necessary. The inspection plan should include, as a minimum, the scope of the inspections, the specific inspection activities, the schedule, and the planned resources. Any subsequent substantive change to the inspection plan should be discussed with RLSB prior to implementation.

02.02 Specific Inspection Requirements

- c. Scoping and Screening Inspection - This LRI verifies that the SSCs required by the rule have been included in the scope of license renewal. The LRI verifies there is reasonable assurance the applicant identified all the passive and long-lived SSCs requiring an aging management review. The applicant may designate groups of like components with similar designs, materials of construction, operating environments, and aging management practices referred to as commodity groups. The inspection should examine a representative set of SSCs and commodity groups chosen using risk insights, features unique to the plant, and previous plant operating history to verify the selected SSCs were subject to an AMR. Using this sample set the inspection should look for the following:**
- 1. Scoping - Evaluate whether the scoping process was implemented consistent with the rule, the applicant's methodology, the information presented in the applicant's LRA, and the results of the staff's review as documented in the SER. Review the SSC's included by the applicant within the scope of the rule. Using the applicant's methodology determine if the five systems and three structures, not identified in the applicant's LRA, were appropriately excluded from the scope of the rule. Carefully compare the justification used to include or exclude any SSC against the descriptions of the SSC in the Updated Final Safety Analysis (UFSAR), and under the CLB, the relative importance of the SSCs in a design basis event.**
 - 2. Screening - Evaluate whether the screening process was implemented consistent with the rule, the applicant's methodology, the information presented in the applicant's LRA, and the results of the staff's review as documented in the SER. The applicant will identify the SCs and commodity groups contained within the evaluation boundaries that are within the scope of the rule. Determine the appropriateness of the evaluation boundaries by examining SCs beyond the limit of the boundaries established by the applicant. Review a sample of SCs for their intended function, their active or passive characteristic, and their long or short-lived characteristics. Assure the justification used to classify a SC is reasonably supported by the description of the component in the UFSAR, including site-specific and industry operating history.**
- b. Aging Management Review Inspection - The applicant is required to identify all applicable aging effects for the SCs subject to AMR and within the scope of the rule. For each SC requiring an aging management program, the applicant is required to demonstrate the effects of aging will be adequately managed so there is reasonable assurance the intended function will be maintained consistent with the CLB throughout the period of extended operation. This inspection is intended to assess the AMR portion of the LRA. For selected SCs within the scope of the rule requiring an AMR, the following inspection activities should be undertaken:**
- 1. For the selected SSCs determine from the LRA and SER which aging management programs (AMPs) are credited to prevent applicable aging effects. This will typically be a combination of existing programs and practices, existing programs that need enhancement, and new programs to be created. These AMPs are the focus of this inspection.**
 - 2. Review the available documentation description of these AMPs from the LRA, UFSAR, Plant procedures, and related engineering support documentation. Determine the on-site engineering staff responsible for implementation of these**

AMPs and interview them to assess their knowledge and involvement in the license renewal effort. Discuss program methods, past results, past weaknesses and corrections, and future plans.

- 3. Verify the applicant implemented their methodology for determining plausible and applicable aging effects consistent with the information presented in their LRA and the results of the staff's review as documented in the SER in determining the AMPs.**
 - 4. Verify the applicant evaluated site-specific information such as surveillance test results, preventive maintenance records, corrective maintenance records, equipment history files, inservice test and inspection results in determining aging affects. Verify the applicant evaluated industry operational experience such as generic communications, vendor notifications, INPO notifications, etc. in determining aging affects.**
 - 5. Perform walk-downs of the selected in-scope systems and structures to verify that any observable aging effects were identified in the LRA. If possible, the on-site responsible engineering staff should accompany the inspector during the walk-down to discuss observations at the equipment location. Portions of this inspection should be performed during a unit outage, to allow visual observation of equipment inaccessible during power operation, i.e., inside containment, normal high radiation areas, etc. Observed aging effects not addressed by the LRA and resulting AMPs should be addressed to the applicant and resolved with the support of NRR.**
 - 6. Review the applicant's documentation associated with the demonstration of AMPs. For the selected SSCs, verify the adequacy of the description in the LRA and supporting documentation of AMP activities that are relied upon to demonstrate that the intended SSC functions will be adequately maintained during the period of extended operation. For existing programs, review the results of past tests and inspections. Assure the proposed or existing programs adequately demonstrates ample opportunity to detect, monitor, trend, and correct age related degradations through performance and/or condition monitoring, technical specification surveillances, and other aging management activities.**
- c. Annual Update/Open Item Inspection - The applicant may make changes to the plant or the current licensing basis while the NRC performs its review of the LRA. Annually, after the initial application, the applicant is required to submit an amendment to the original application describing any change that materially affects the contents of the original application. The applicant may also make changes or commitments to satisfy an issue raised during the SER process or raised during a previous LRI.**
- 1. Select a sample of plant modifications and CLB changes the applicant made since the date of the original LRA submittal. Determine that these changes were included in an annual LRA update. For newly installed plant equipment required to be in the scope of license renewal, verify that the equipment is included in appropriate aging management programs.**

2. Compile the issues raised by previous LRIs and determine the current status from the applicant. Determine if the issue has been resolved. If the issue has not been resolved determine what the applicant's plans are to resolve the issue and coordinate with NRR to determine the acceptability of those plans.

71002-03 INSPECTION GUIDANCE

03.01 General Inspection Guidance - The LRIP will be implemented, prior to the approval of an application for renewed license, to verify that an applicant, requesting a renewed license under 10 CFR Part 54, meets the requirements of the rule and has implemented license renewal programs and activities consistent with their LRA and the LRA safety evaluation report (SER) developed by the staff.

Inspectors should familiarize themselves with the requirements and guidance relating to license renewal. Inspectors should familiarize themselves specifically with the LRA and associated safety evaluations performed by the staff for the specific plant to be inspected. License renewal requirements and guidance documents that should be reviewed prior to an inspection include:

1. 10 CFR Part 54, "Requirements for Renewal of Operating Licenses for Nuclear Power Plants";
2. The statements of consideration (SOC) published with the revision to the rule in the Federal Register, Vol. 60, No. 88, Monday, May 8, 1995, pages 22461 to 22495;
3. Draft Regulatory Guide 1047; "Standard Format and Content for Applications to Renew Nuclear Power Plant Operating Licenses," August 1996;
4. Nuclear Energy Institute 95-10, "Industry Guideline for Implementing the Requirements of 10 CFR Part 54 - The License Renewal Rule," March 1996; and
5. NRC approved positions relating to license renewal.

The overall scope of a license renewal inspection should include approximately 20 percent of the systems (no less than six systems), approximately one-third of the structures (no less than three major structures), and a minimum of three commodity groups. The sample should be selected during the inspection planning process from the list of in-scope SSCs appearing in the LRA. The sample should include a variety of systems, structures, components, and commodity groups that involve mechanical, structural and electrical components with diverse characteristics, environments, and application.

Throughout the license renewal inspection, the inspectors should review the supporting documentation associated with an applicant's license renewal program to verify that documentation required by the rule, or otherwise necessary to verify compliance with the rule, is being maintained in an auditable and retrievable form consistent with the requirements 10 CFR 54.13 and 54.37, the applicant's LRAs, and site approved programs and procedures.

The LRIP includes visual inspection of the structures and components requiring an aging management review, to look for aging effects not identified by an applicant in their LRA or identified by the staff during their safety evaluation of an LRA. Portions of this inspection should be performed during a unit outage, to allow visual observation of equipment inaccessible during

power operation, i.e. inside containment, normal high radiation areas, etc. Observed aging effects not addressed by the LRA and resulting AMPs should be addressed to the applicant and resolved with the support of NRR.

All inspection activities relating to a renewed license that are performed after the approval of that license will be performed under the Reactor Inspection Program (IMC 2515), and are outside the scope of this inspection procedure.

03.02 Specific Inspection Guidance

- a. **Integrated Plant Assessment.** 10 CFR 54.21(a) requires that each LRA contain an Integrated Plant Assessment (IPA). 10 CFR 54.3 defines the IPA as a licensee assessment that demonstrates that a nuclear power plant facility's structures and components requiring aging management review in accordance with 54.21(a) for license renewal have been identified and that the effects of aging of such SSCs will be managed to assure that the intended function(s) will be maintained in accordance with the CLB during the period of extended operation. The IPA is the integrated engineering analysis that the licensee must perform to support a request for license renewal and the LRA describes that analysis. Typically the IPA process includes the following: (1) scoping to determine which SSCs are included within the scope of license renewal, (2) screening to determine from the in-scope SSCs, which of the structures and components (SCs) require an aging management review, (3) identifying aging effects applicable to those SCs, (4) developing and implementing aging management programs, and (5) demonstrating the effectiveness of each AMP.
 1. **Scoping.** 10 CFR 54.4(a) provides the criteria for the SSCs required to be included within the scope of license renewal. For the SSCs within the scope of the rule, the applicant will have to identify the system and structural level functions that meet the criteria under 10 CFR 54.4(a). System-level and structural-level functions are the functions that define the plant process, condition, or action that must be accomplished in order to perform or support a safety function, or a specific requirement of one of the five regulated events identified under 54.4(a)(3). The functions the SSCs must fulfill are the functions that are the bases for including them within the scope of license renewal.

The completeness of the applicants scoping process will be evaluated during the LRA technical review performed at NRR. Any potential deficiencies associated with the documentation and implementation of the scoping process, the SSCs determined to be within the scope of the rule, or the SSCs functions identified during the site inspection should be documented in the inspection report and promptly communicated to NRR.

Licensees sometimes categorize nonsafety-related SSCs as safety related for reasons of convenience. As a result, some SSCs categorized as safety related may not meet the safety-related criteria under 10 CFR 54.4(a)(1). In addition, some safety related systems may meet the safety related criteria under 10 CFR 54.4(a)(1) and may also meet the criteria under 10 CFR 54.4(a)(2) and/or (a)(3). It is important to recognize that certain SSCs may meet more than one scoping criterion and each applicable scoping criterion can add additional system/structural-level functions to some of SSCs included within the scope of the rule. Based on the rule and NRC approved industry guidance, applicants are to assess each SSC against each of the criterion under 10 CFR 54.4(a) for inclusion within the scope

of the rule, and to determine the system/structural-level function(s) associated with each applicable criterion.

As required under 10 CFR 54.4(b), 54.21(a)(1)(I), and 54.37(a), the system/structural-level function(s) for each SSC within the scope of the rule, is required to be documented at a sufficient level of detail to provide the bases for including the SSC within the scope of the rule. The system/structural-level functions are expected to be presented in the form of brief descriptions with enough detail to convey the essential parameters. Although the adequacy of an applicant's description of an intended function will be considered during the NRR technical review of the LRA, inspectors should be aware of these requirements when verifying that the intended functions identified by the applicant are consistent with the rule.

Based on staff approved industry guidance in NEI 95-10, applicants have the option to use alternate methods for identifying SSCs within the scope of the rule. For example, if an applicant already has a process in place that meets the scoping and screening requirements under 10 CFR 54.4 and 54.21(a)(1), the applicant can use the results from that previously established process to identify the SSCs within the scope of the rule and their intended functions. If alternate methods are used, they will be reviewed during the inspection in a manner similar to this inspection guidance.

2. **Screening - Consistent with 10 CFR 54.21(a) and NRC approved industry guidance, applicants are required to identify and list those SCs requiring an aging management review. The screening of SCs that require an aging management review from the SSCs that meet the criteria under 10 CFR 54.4 typically involves the following activities: (1) identifying evaluation boundaries, (2) excluding the SCs within the evaluation boundaries that are excluded by the rule, NRC approved guidance and documented staff positions, (3) identifying structural/component-level intended functions, (4) determining active/passive and long/short-lived characteristics of the SCs for each intended function, to exclude some SCs and (5) listing those SCs subject to an aging management review.**

Consistent with the requirements of the rule and NRC approved industry guidance, an applicant has the option of using a previously selected list of SCs that meet the criteria under 10 CFR 54.4. If an applicant chooses to use a preselected list of SCs to meet the requirements of the rule or parts thereof, the adequacy of the preselection process and the completeness of the list of SCs requiring an aging management review will be assessed during the NRR technical review of the LRA under the guidance of the SRP-LR. The site inspection team will inspect documentation supporting the process to verify that it was implemented and produced results consistent with the requirements of the rule and the process presented in the LRA.

The site inspection will verify the necessary information and documentation are available to support the screening process. Although the adequacy of the screening process used by the applicant and the list of selected SCs determined to be within the scope of license renewal is reviewed by NRR during their evaluation of the LRA, any potential deficiencies associated with the implementation of the documented process and the resulting list of SCs identified during the site inspection should be promptly communicated to NRR for resolution and included in the inspection report. Inspectors should review the results of the screening process of the SCs for each intended function to verify the proper

implementation of the screening process as documented in the LRA and the completeness of the list of SCs requiring an AMR.

Evaluation boundaries are typically documented in the form of marked-up plant drawings that mark the boundaries of the SSCs that contribute to the system/structural-level functions. The evaluation boundaries may be provided in a text format. Text format is typically a list by plant component identification number, of parts of the SSC that are in-scope. The inspection team will have to obtain plant drawings and a sample of the lists to the drawings to conclude if the evaluation boundaries are correct. If a text format is used, it must also bound and identify the SSCs that contribute to the system/structural level function for the system or structure under review. The NRR technical review will assess the applicant's process and the technical correctness of evaluation boundaries selected. The site inspection team will visually inspect the evaluation boundaries of the SSCs included within the scope of the inspection to verify that there is reasonable assurance that the process was implemented as described in the LRA. The inspection team will assess samples of SCs, up to five key components, outside the evaluation boundary and their intended function(s) for potentially belonging within the scope of the rule. If the team identifies any SCs that were incorrectly omitted from scope the issue will be discussed with NRR to obtain their agreement in resolving the issue with the applicant.

Except for those SCs excluded by the rule, staff approved guidance, and documented staff positions, all SCs within the evaluation boundaries are considered within the scope of the rule, and must be evaluated by the applicant to determine if an AMP is required. This evaluation includes identifying the structural/component level intended function(s), the active/passive and/or long/short-lived characteristics, and applicable aging effects for those SCs within the evaluation boundary.

NRC approved guidance for screening allows an applicant to group SCs, with identical characteristics, into "commodity groups." The acronym SC as used in this guidance, should be interpreted to mean structure, components, and commodity groups, whenever commodity groups are used by the applicant. Commodity grouping characteristics for SCs include, but are not limited to, similar designs, materials of construction, aging management practices, and (internal and external) environments. The NRR technical review will assess the process for grouping SCs and the technical correctness of SCs grouped together. The site inspection team will inspect the implementation of this process to verify that it was implemented and produced results consistent with the requirements of the rule and the program presented in the LRA.

As required under 10 CFR 54.4(b), 54.21(a)(1)(i), and 54.37(a), the structural/component/commodity group-level intended functions for each of the SCs determined to be within the scope of the rule, are required to be identified. These intended functions are required to be documented at a sufficient level of detail such that a reviewer can determine that they are consistent with the system/structural level functions, that they are technically correct and complete for each SC, and that they are consistent with the rule. The structural/component-level intended functions are expected to be presented in a brief descriptive format (may be as brief as a few words), but must satisfy these requirements. The NRR technical review of the LRA will assess the technical correctness and completeness of the intended functions selected as well as the level of detail. Any deficiencies with the correctness and completeness of the documented intended functions

determined by the applicant, that are identified during the site inspections, should be promptly brought to the attention of NRR and documented in the inspection report.

As required under 10 CFR 54.21(a)(1)(i), an applicant must identify each SC that performs its intended function without moving parts or change in configuration or properties (passive). For the purpose of license renewal, moving parts refer to a relative difference in movement among the subparts or subcomponents of a structure or component to perform its intended function. For example, the typical function of a motor is to provide a moving force which requires a rotating armature or moving parts. (Note: It isn't the intended function of the motor providing a moving force that makes it active. It is the fact that the motor uses a rotating armature to perform this function.) A change in configuration refers to a change in relative position. The intended function of a ventilation damper is to control the flow of air by changing the relative position of the damper disc and therefore the damper is an active component. The change in properties refers to a change in chemical, certain physical, or other properties similar to the changes in the electrolytic properties of a battery (an active component) needed for that battery to provide an electrical current. Changes in physical characteristics can include a change in physical makeup, or change in gaseous, liquid or solid state, but does not include a change in temperature, or the pressure created by or exerted on a component. Other physical characteristics will have to be considered on case-by-case bases.

In the SOC published with the rule, the Commission also concluded that "a change in configuration or properties should be interpreted to include a change in state." A change in state consists of a change in physical state as discussed above or a change in energized state. For example, the pressure control function of the pressurizer is accomplished by cycling the pressurizer heaters on and off. Although one intended function of a heater is to add heat to a medium, this typically does not require moving parts or change in configuration or property. However, the intended function of maintaining pressurizer pressure by cycling heaters on and off does require a change of state, making the pressurizer heaters active components.

Although the adequacy of this process and the correctness and completeness of the active/passive characteristics determined by the applicant for the SCs within the scope of the rule and their intended functions will be evaluated by NRR during the LRA review, any deficiencies associated with the implementation of the documented process, and the active/passive determination of any structure or component identified during the site inspection should be promptly brought to the attention of NRR and documented in the inspection report.

As required under 10 CFR 54.21(a)(1)(ii), applicants can identify those SCs that are not subject to replacement based on a qualified life or specified time period (long-lived). SCs that have a qualified life of less than 40 years, and that are replaced based on their qualified life (short-lived) do not require an aging management program. Alternatively, SCs that are included in a site approved program that will ensure their periodic replacement at a frequency of less than 40 years (also short-lived) do not require aging management. Although the adequacy of this process and the correctness and completeness of the short/long-lived determination of the SCs within the scope of the rule will be evaluated by NRR during the LRA review, any apparent incorrect determination of short-lived structures or components identified during the site inspection should be promptly brought to the attention of NRR and documented in the inspection report.

Because the SCs within the correct evaluation boundaries should be both passive and long-lived to require an AMR, any structure or component that is correctly determined to be either active or short-lived will not need to be included among those SCs that require an AMR. Therefore, an applicant may choose to eliminate a structure or component from the list of those SCs requiring an AMR based on either the active or short-lived determination, which ever is easier to determine. This is an acceptable approach per the NRC approved guidance, and may result in the absence of the active/passive determination of those SCs that have been correctly determined to be active or short-lived.

The rule, under 10 CFR 54.21(a)(1), requires an applicant to identify and list all SCs requiring an AMR. To meet this requirement, NRC approved guidance states that an applicant needs to provide a list of individual SCs (those SCs not included within commodity groups), a list of commodity groups, and a description of each commodity group that clearly bounds and identifies the SCs included in each commodity group. Although this “condensed” list of structures and components is acceptable for an LRA, the applicant is required to have a complete list of individual SCs on-site in an auditable and retrievable form. By comparing the condensed and complete lists, inspectors can identify SCs screened out and evaluate the correctness of that determination. Although the adequacy of this process and the correctness and completeness of the list of SCs requiring an AMR will be evaluated by NRR during the LRA review, any deficiencies in the list of individual components, commodity groups, and the description of each commodity group identified during the site inspection should be promptly brought to the attention of NRR and documented in the inspection report.

As prescribed under 10 CFR 54.21(a)(2), applicants are also required to describe and justify the methods used to determine those SCs requiring an aging management review in the LRA. Any concerns with the technical adequacy of the description and justification will be communicated to NRR for resolution.

3. **Aging Effects** - Each applicant must identify all applicable aging effects for each intended function associated with each SC requiring an aging management review. As per staff approved industry guidance for identifying applicable aging effects, applicants are to perform a technical review of the materials, environments, and stressors associated with each SC, and a review of site-specific and industry operating experience as well as plant maintenance experience to determine any applicable aging effects.

Site inspection teams will assess the applicant’s consideration of industry-operating experience, site-operating experience and site-maintenance history. Inspectors will review a sample of the maintenance history of the SCs within the scope of the inspection to verify that the applicant considered site-maintenance history in determining applicable aging effects. Any concerns with an applicant’s process used to identify aging effects or with the technical correctness or completeness of the applicable aging effects as documented in the LRA, identified during inspection, will be brought to the attention of NRR and documented in the inspection report.

4. **Aging Management Review** - As required under 10 CFR 54.21(a)(3), an applicant is required to demonstrate that the aging effects will be adequately managed so the intended function will be maintained consistent with the CLB for the period of extended operation. To fulfill this requirement an applicant must first identify the

applicable aging effects, and the aging management program(s) and activities that will manage each aging effect. The technical adequacy and completeness of the aging management programs used to manage aging effects will be assessed by NRR during the LRA review. However, any concerns with the technical correctness and completeness of the AMPs identified by the site inspection team during the inspection of documentation or the inspection of the material condition of a structure, component or commodity group needs to be promptly brought to the attention of NRR and documented in the inspection report.

The rule initially required applicants to identify aging mechanisms. The rule was revised in 1995 and currently requires an applicant to identify aging effects. It may be difficult to manage the effects of aging without understanding the mechanism(s) and specifically addressing the mechanism that causes the aging effect. Therefore, an applicant has the option of identifying aging mechanisms and to develop programs to address these mechanisms. However, if an applicant decides to use aging mechanisms, they must clearly correlate the mechanisms with the aging effects, such that there is no confusion as to which aging mechanism correlates to which aging effect, and which AMP correlates to which aging mechanism and/or aging effect. In general, the applicant should be consistent in their use of aging mechanisms and the level of detail used to describe aging effects/mechanisms and related AMPs.

As part of the inspection process of AMP documentation, the site inspector needs to ensure that the implementation of the program is producing results consistent with the claims made by the applicant as to how the program will manage the aging effect in question. Each program should clearly state how the aging management program will manage the aging effect/mechanism and the supporting documentation along with the material condition of the SCs must be consistent with these claims.

The assessment of an AMP to meet its objective(s) should not be limited to SCs within the evaluation boundaries. If a program fails to meet its objective in similar applications but outside of the evaluation boundaries, the failures need to be assessed by the applicant, and an adjustment to the program may need to be made to prevent failure within the evaluation boundaries. To this end, the site inspection team can inspect any AMP failure(s), independent of the location of the failure(s) with respect to the evaluation boundaries, to verify that the AMPs are being implemented in a manner that are effectively managing the aging effects.

Individual failure of a program to fulfill its stated aging management objectives does not automatically result in the program being determined as ineffective. For example, a chemistry control program has a stated objective of preventing corrosion from causing the loss of material in carbon steel piping to drop below the design minimum wall thickness throughout the period of extended operation. If a section of carbon steel piping drops below minimum wall thickness prior to the end of the period of extended operation, the applicant needs to assess the particular incident(s) that exceeded the stated objective and determine the cause of that failure(s). If an applicant can determine the reason for not meeting its stated objective, take corrective actions to correct the cause, and demonstrate the effectiveness of the corrective actions; or specifically explain why the failure caused in one location does not have an effect on other locations within evaluation boundaries, the program can still be used to manage the effects in this and similar situations. In addition to assess a particular failure(s) of an AMP, an applicant needs to identify other areas that

experience the same stressor(s) that can result in a similar failure(s) and need to implement corrective actions, as appropriate. Repeated failure is considered a good indication of a basic deficiency or the inability of an AMP to manage aging effects.

Some AMPs may have an objective to monitor and trend ongoing degradation, and implement corrective actions prior to anticipated failure of a structure or component to perform its intended function consistent with the applicant's CLB. For these AMPs, the technical review performed by NRR will assess the technical adequacy of the trending process. During the site inspection, any trends identified as being less conservative with respect to the objective(s) of the AMPs in the LRA and/or site-approved procedures needs to be identified to NRR and included in the inspection report.

NRC inspection of the material condition of SCs is an important element of the aging management review process. Although it is recognized that an NRC inspection of each SCs requiring an AMR can not be performed, an inspection of a good cross-section of SCs that are constructed of different materials in a variety of applications, environments, and environmental stressors, and that experience a variety of aging effects should be performed. This cross-section should be skewed toward more adverse environments (e.g., open, salt water environments versus closed, treated water environments, or the upper levels, high radiation areas of containment versus climate controlled, low radiation switchgear rooms), but should not exclude mild, controlled environments. In addition, the material conditions of a good cross-section of the SCs within commodity groups should also be inspected. Efforts should also be made to inspect during an outage the material condition of SCs with limited access during plant operation to ensure the thorough implementation of AMPs throughout the plant. The material condition of the SCs requiring an AMP should be consistent with the conditions required by the CLB and the objectives of the AMP as stated in the LRA. During the inspection of SCs, inspectors should look for any material condition of a structure or component that is found to be degraded such that it cannot perform its intended function consistent with the applicant's CLB, that is experiencing excess aging inconsistent with the objectives of the AMPs intended to manage the observed aging, that is exceeding its expected trend in degradation, or that is experiencing aging effects of a type not considered in the LRA.

5. Demonstration - As required under 10 CFR 54.21(a)(3), applicants are required to include a demonstration that the effects of aging for each SC requiring an AMR will be adequately managed such that the intended function(s) will be maintained consistent with the CLB for the period of extended operation.

To meet this requirement for an existing program, an applicant may provide a complete and accurate summary of the results from the implementation of each existing AMP discussed in the LRA. This summary should accurately reflect supporting information and objective evidence from the implementation of each program and should serve to demonstrate the adequacy of the AMP. This summary should also include a discussion of the applicable types of age related failures (if any) experienced, the corrective actions taken to prevent future failures, and the results from implementing the corrective actions or a technical justification as to why those failures will not prevent the program from meeting its objective(s) during the period of extended operation as stated in the LRA.

For those newly developed programs without sufficient supporting information or objective evidence to provide an adequate demonstration, consistent with staff approved

industry guidance, applicants may provide the following information: (1) a justification as to why the AMP being proposed will provide reasonable assurance that the effects of aging will be managed during the period of extended operation, (2) a schedule for providing supporting information and/or objective evidence that the AMP is adequately managing the aging effects, (3) a description of any applicable criteria, limits, and thresholds, and (4) a description of the planned corrective actions if the AMP does not adequately manage the aging effects.

For the demonstration of new and existing programs, the technical review performed by NRR will assess the adequacy of the demonstrations provided. The site-inspection teams will review any available documentation associated with the demonstration of the AMPs identified in the LRA. During the site inspection process, the site inspection team will inspect the material condition of some of the accessible SCs within the scope of the inspection, that have AMPs in place, in order to verify that the material conditions of the SCs are being maintained adequately. Any discrepancies in documentation or material conditions will be brought to the attention of NRR and documented in the inspection report.

- b. **CLB Changes** - As required under 10 CFR 54.21(b), each year following the initial submittal of the LRA and at least three months before the scheduled completion of the NRC review, applicants are required to submit an amendment to the renewal application identifying any changes to the CLB of the facility that materially affects the contents of the LRA, including the FSAR supplement. The site inspection team will review any available information and documentation associated with the changes in the CLB identified by the applicant in the amendment to the renewal application. The team will review the group of plant modifications made since the date of the LRA submittal. The team should select a sample of plant equipment affected by these modifications that are within the scope of license renewal and verify that newly install equipment is being incorporate into the appropriate AMPs.
- c. **FSAR Supplement** - 10 CFR 54.21(d) requires each applicant to provide an FSAR supplement for the facility that contains a summary description of the programs and activities for managing the aging effects and the evaluation of TLAAs for the period of extended operation. The technical correctness and level of detail of the information provided in the FSAR supplement will be reviewed by NRR. However, the site inspection team will verify that the summary description of the programs in the FSAR supplement is consistent with the program implemented by the applicant. Any concerns with the technical correctness and completeness of the FSAR supplement identified during the inspection will be brought to the attention of NRR and documented in the inspection report.

71002-04 RESOURCE ESTIMATES

It has been estimated that the license renewal inspection activities will require approximately four weeks of inspection time on site involving a team of four inspectors and a team leader. Each week of inspection will require one week of prior preparation and one following week of documentation. In addition, it has been estimated that the team leader will need approximately an additional 10 working days to finalize the inspection report. Based on these estimates, each application will require 1.2 FTE of inspection activities prior to the approval of a renewed license.

71002-05 REFERENCES

- 1. 10 CFR Part 54, "Requirements for Renewal of Operating Licenses for Nuclear Power Plants"**
- 2. Regulatory Guide 1-188, "Standard Format and Content for Applications to Renew Nuclear Power Plant Operating Licenses," July 3, 2001**
- 3. Nuclear Energy Institute Guideline 95-10, "Industry Guideline for Implementing the Requirements of 10 CFR Part 54 - The License Renewal Rule," Revision 3, March 2001**
- 4. NUREG 1568, "License Renewal Demonstration Program: NRC Observation and Lessons Learned," December 1996**
- 5. U.S. Nuclear Regulator Commission, "Nuclear Power Plants License Renewal; Revisions," Federal Register, Vol. 60, No. 88, Monday, May 8, 1995, pages 22461 to 22495**
- 6. NUREG-1800, "Standard Review Plan for the Review of License Renewal Applications for Nuclear Power Plants," July, 2000.**

END

**Peach Bottom Atomic Power Station License Renewal Inspection
Acronyms**

AMR	Aging Management Review
ASME	American Society of Mechanical Engineers
ATWS	Anticipated Transient Without Scram
BWR	Boiling Water Reactor
CFR	Code of Federal Regulations
CRD	Control Rod Drive
DBD	Design Basis Document
DBE	Design Basis Event
ECCS	Emergency Core Cooling System
ECT	Emergency Cooling Tower
EDG	Emergency Diesel Generator
EQ	Environmental Qualification
ESF	Engineered Safety Feature
ESW	Emergency Service Water
FSSD	Fire Safe Shutdown
HELB	High Energy Line Break
HPCI	High Pressure Coolant Injection
HPSW	High Pressure Service Water
HVAC	Heating, Ventilation and Air Conditioning
I&C	Instrumentation and Controls
IPA	Integrated Plant Assessment
ISI	Inservice Inspection
LOCA	Loss of Coolant Accident
LPCI	Low Pressure Coolant Injection
LRA	License Renewal Application
MCC	Motor Control Center
MSIV	Main Steam Isolation Valve
P&ID	Piping and Instrumentation Diagram
PBAPS	Peach Bottom Atomic Power Station
PCIS	Primary Containment Isolation System
RAI	Request for Additional Information
RCIC	Reactor Core Isolation Cooling
RCS	Reactor Coolant System
RHR	Residual Heat Removal
RPS	Reactor Protection System
RPV	Reactor Pressure Vessel
SBLC	Standby Liquid Control
SBO	Station Blackout
SGTS	Standby Gas Treatment System
SSCs	Structures, Systems and Components
TLAA	Time Limited Aging Analyses
UFSAR	Updated Final Safety Analysis Report