

May 22, 2003

MEMORANDUM TO: S.K. Mitra, Project Manager  
License Renewal , H.B. Robinson

Russ Arrighi, Project Manager  
License Renewal, Ginna

Raj Auluck, Senior Project Manager  
License Renewal, V.C. Summer

T.J. Kim, Senior Project Manager  
License Renewal, Dresden (2 & 3) and Quad Cities (1 & 2)

FROM: Pao-Tsin Kuo, Program Director **/RA/**  
License Renewal and Environmental Impacts Program  
Division of Regulatory Improvement Programs  
Office of Nuclear Reactor Regulation

SUBJECT: AGING MANAGEMENT PROGRAM AUDIT PLAN - FOR ROBINSON,  
GINNA, SUMMER AND DRESDEN AND QUAD CITIES LICENSE  
RENEWAL APPLICANTS

Attached is the final version of the aging management program audit plan (AMPAP), for Robinson, Ginna, Summer, Dresden and Quad Cities applications currently under review. The purpose of this audit is to confirm the consistency between the applicant's plant-specific aging management program (AMP) and the Generic Aging Lessons Learned (GALL) AMP as indicated in the applications.

Each project manager should provide this AMPAP to your applicant as soon as possible, and prepare to implement the audit as part of the safety review.

Attachment: As stated

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| DATE   | 5 /22 /03    | 5 /22 /03    | 5 /22 /03    | 5 /22 /03   |

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DISTRIBUTION: Aging Management Program Audit Plan, Dated: May 22, 2003

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# LICENSE RENEWAL APPLICATION (LRA) AGING MANAGEMENT PROGRAM AUDIT PLAN (AMPAP)

## I PURPOSE

The Standard Review Plan for Review of License Renewal (SRP-LR) Applications for Nuclear Power Plants (NUREG-1800, July 2001) (Reference 1) provides staff guidance for reviewing a license renewal application. It allows an applicant to reference the Generic Aging Lessons Learned (GALL) report (Reference 2) in an LRA to demonstrate that the program at the applicant's facility corresponds to those reviewed and approved in the GALL report, and that no further staff review is required. If an applicant takes credit for a GALL program, it is incumbent on the applicant to ensure that the plant program contains all the elements of the referenced GALL program. In addition, the conditions at the plant must be bounded by the conditions for which the GALL program was evaluated. The applicant's determination should be documented in an auditable form and the documentation is to be maintained on site. The purpose of this audit is to confirm the consistency between the applicant's plant-specific aging management program (AMP) and the GALL AMP as indicated in the applicant's LRA.

## II SCOPE

The following AMPs are generally credited for license renewal:

1. AMPs that are consistent with GALL
2. AMPs that are mostly consistent with GALL but have some deviations
3. AMPs to be developed in the future, but will be consistent with GALL
4. AMPs to be developed in the future, but will not be consistent with GALL
5. Non-GALL AMPs

Table 1 gives more details on audit activities based on the classification of AMPs. The AMPAP will provide guidance for audit scheduling, activities and resources described below. This audit does not duplicate the AMR inspection and is intended to be performed early in the review process or along with, but prior to the AMR inspection.

## III AUDIT ACTIVITIES

The License Renewal Section, License Renewal and Environmental Impacts Programs (RLEP), DRIP, NRR staff will be responsible for conducting the audit.

Resources                      The cognizant license renewal PM, supported by 2-4 auditors.

Cross Training                None required.

Duration/Venue                2 days at applicant's plant site

|                |  |
|----------------|--|
| Communication  | There will be an entrance meeting which will not be public. The exit meeting at the end of the audit will be open to the public, but may be combined with the regional inspection on AMPs. Audit findings of deviations, if any, will be communicated to the technical staff for further review. Successful completion of the audit will be described in the staff safety evaluation report (SER).   |
| Administrative | At least half of all the AMPs identified in the applicant's LRA will be audited.   |
| Activities     | <p>The specific activities consistent with the AMP classification above should be performed (see Table 1).</p> <ul style="list-style-type: none"> <li>i) The RLEP PM will verify that the applicant's AMPs have the 10 standard attributes and are consistent (or otherwise) with GALL by examining the details provided in the LRA or in plant operating procedures or in other licensee documents.</li> <li>ii) The audit team will not duplicate the regional inspection such as examine records for existing aging management programs to evaluate the programs' effectiveness.</li> <li>iii) Verify that the deviations from GALL are identified in the LRA.</li> </ul> |

The RLEP PM will summarize the audit findings in the audit report and include the findings in the staff's SER. The RLEP PM will identify potential issues to the technical staff for follow-up evaluation. If any additional information is needed from the applicant, the RLEP PM, will coordinate the request with the technical staff and provide appropriate input to the SER to reflect issue resolution.

#### IV REFERENCES

1. Standard Review Plan for Review of License renewal Applications for Nuclear Power Plants, NUREG-1800, July 2001
2. Generic Aging Lessons Learned (GALL) Report, NUREG-1801, Vol.1, July 2001

**Table 1 - LICENSE RENEWAL APPLICATION  
AGING MANAGEMENT PROGRAM AUDIT PLAN (AMPAP)**

|    | <b>AMP Category</b>  | <b>Audit Activity Plan</b>   | <b>Staff Guidance</b>          |
|----|--|--|--------------------------------|
| 1. | AMPs consistent with GALL  | Compare all of the 10 GALL attributes to those of the applicant's AMP                                  | Perform Activity i, ii         |
| 2. | AMPs consistent with GALL with deviations                            | Compare the 10 GALL attributes as above and verify that the deviations are identified in the LRA       | Perform Activity i, ii and iii |
| 3. | AMPs to be developed in the future that will be consistent with GALL | None<br>(Note: The regional inspection will verify that commitments are appropriately tracked on-site) |                                |
| 4. | AMPs to be developed in future, but will not be consistent with GALL | None   |                                |
| 5. | Non-GALL AMPs  | None   |                                |