ORDER FOR SUPPLIES OR SERVICES

PAGE OF PAGES: 1 | 5

IMPORTANT: Mark all packages and papers with contract and/or order numbers. BPA NO.

1. DATE OF ORDER: 4/29/05	2. CONTRACT NO. (If any): GS10F0209K
3. ORDER NO.: DR-03-05-028 MODIFICATION NO.	4. REQUISITION/REFERENCE NO.: NRR-05-028

5. ISSUING OFFICE (Address correspondence to):
U.S. Nuclear Regulatory Commission
Division of Contracts
Mail Stop: T-7-I-2
Contract Management Branch 2
Washington, DC 20555

6. SHIP TO:
a. NAME OF CONSIGNEE: U.S. Nuclear Regulatory Commission
Div. of Regulatory Improvement Programs
b. STREET ADDRESS: MailStop: O-12E5
Attn: Sally Adams
c. CITY: Washington | d. STATE: DC | e. ZIP CODE: 20555

7. TO:
a. NAME OF CONTRACTOR: EARTH TECH, INC.
b. COMPANY NAME:
c. STREET ADDRESS: 300 OCEANGATE, SUITE 700
d. CITY: LONG BEACH | e. STATE: CA | f. ZIP CODE: 908022680

f. SHIP VIA:

8. TYPE OF ORDER
[ ] a. PURCHASE — Reference your _____ Please furnish the following on the terms and conditions specified on both sides of this order and on the attached sheet, if any, including delivery as indicated.
[X] b. DELIVERY — Except for billing instructions on the reverse, this delivery/task order is subject to instructions contained on this side only of this form and is issued subject to the terms and conditions of the above-numbered contract.

9. ACCOUNTING AND APPROPRIATION DATA
B&R:520-15-112-130 Job Code:J-3220 BOC:252A 31X0200.520
FFS#: NRR05-028 OBLIGATE: $100,000.00

10. REQUISITIONING OFFICE: NRR
Ofc. of Nuclear Reactor Regulation

11. BUSINESS CLASSIFICATION (Check appropriate box(es))
[ ] a. SMALL [X] b. OTHER THAN SMALL [ ] c. DISADVANTAGED [ ] g. SERVICE-DISABLED VETERAN-OWNED
[ ] d. WOMEN-OWNED [ ] e. HUBZone [ ] f. EMERGING SMALL BUSINESS

12. F.O.B. POINT: N/A

13. PLACE OF		14. GOVERNMENT B/L NO.	15. DELIVER TO F.O.B. POINT ON OR BEFORE (Date)	16. DISCOUNT TERMS
a. INSPECTION	b. ACCEPTANCE		SEE BELOW	N/A

17. SCHEDULE (See reverse for Rejections)

ITEM NO. (A)	SUPPLIES OR SERVICES (B)	QUANTITY ORDERED (C)	UNIT (D)	UNIT PRICE (E)	AMOUNT (F)	QUANTITY ACCEPTED (G)
	SEE ATTACHED STATEMENT OF WORK (SOW) AND THE PRICE SCHEDULE PROJECT TITLE: "TECHNICAL ASSISTANCE FOR NRC'S OFFICE OF NUCLEAR REACTOR REGULATION, LICENSE RENEWAL ENVIRONMENTAL REVIEWS" TYPE OF ORDER: LABOR HOUR PERIOD OF PERFORMANCE: 9/29/05 THROUGH 9/28/2008 TOTAL CEILING OF ORDER: $813,062.28 TOTAL OBLIGATED: $100,000.00 ATTACHMENT 1 - PRICE SCHEDULE; ATTACHMENT 2 - SOW ACCEPTED BY: NAME: R R Bouton TITLE: Vice Pres. DATE: 10/28/05					

SEE BILLING INSTRUCTIONS ON REVERSE

18. SHIPPING POINT	19. GROSS SHIPPING WEIGHT	20. INVOICE NO.	17(h) TOTAL (Cont. pages)

21. MAIL INVOICE TO:
a. NAME: U.S. Nuclear Regulatory Commission
Payment Team, Mail Stop T-9-H-4
b. STREET ADDRESS (or P.O. Box): Attn: (insert contract or order number)
c. CITY: Washington | d. STATE: DC | e. ZIP CODE: 20555

17(i). GRAND TOTAL: NTE $100,000.00

22. UNITED STATES OF AMERICA
BY (Signature): Stephen M. Pool

23. NAME (Typed): Stephen M. Pool
TITLE: CONTRACTING/ORDERING OFFICER

AUTHORIZED FOR LOCAL REPRODUCTION
PREVIOUS EDITION NOT USABLE

TEMPLATE - ADM001

SISP REVIEW COMPLETE

OPTIONAL FORM 347 (REV. 3/2005)
PRESCRIBED BY GSA/FAR 48 CFR 53.213(e)

ADM002

ATTACHMENT 1

Price Schedule
DR-03-05-028

GSA Category	Estimated Quantity	Unit	Unit Price	Total Amount
Task 1- Orientation				
Principal I	[redacted]	hours	[redacted]	30,548.32
Sr. Professional IV	[redacted]	hours	[redacted]	1,254.48
Sr. Professional III	[redacted]	hours	[redacted]	31,131.52
Sr. Professional II	[redacted]	hours	[redacted]	10,103.28
Sr. Professional I	[redacted]	hours	[redacted]	6,154.24
Staff Professional III	0	hours	[redacted]	0.00
Technician III	0	hours	[redacted]	0.00
Task 1 Ceiling (Labor)				79,191.84
Task 2 - Reviews (Issued by Work Orders)				
Principal I	[redacted]	hours	[redacted]	235,360.92
Sr. Professional IV	[redacted]	hours	[redacted]	49,551.96
Sr. Professional III	[redacted]	hours	[redacted]	167,331.92
Sr. Professional II	[redacted]	hours	[redacted]	70,263.72
Sr. Professional I	[redacted]	hours	[redacted]	95,775.36
Staff Professional III	[redacted]	hours	[redacted]	30,328.56
Technician III	[redacted]	hours	[redacted]	16,394.00
Task 2 Ceiling (Labor)				665,006.44
Travel Ceiling	[redacted]	lot	[redacted]	64,000.00
G&A on M&S/ODC's (7.6%)	[redacted]	ODC's/travel	.076	4,864.00
TOTAL CEILING				**$813,062.28**

(Differences from proposal are due to rounding.)

ATTACHMENT 2

STATEMENT OF WORK
DR-03-05-028
TECHNICAL ASSISTANCE FOR NRC'S OFFICE OF NUCLEAR REACTOR REGULATION LICENSE RENEWAL ENVIRONMENTAL REVIEWS

1.0 BACKGROUND

NRC's Office of Nuclear Reactor Regulation (NRR) is responsible for ensuring the public health and safety through licensing and inspection activities at all commercial nuclear power reactor facilities in the United States. Whereas NRC's primary mandate of protecting public health and safety is governed by the Atomic Energy Act, the mission of protecting the environment is contained in numerous legislative initiatives. These include the National Environmental Policy Act (NEPA), the Endangered Species Act, the Clean Water Act, National Historic Preservation Act, Coastal Zone Management Act, and several other laws. NRC's environmental protection regulations for the nuclear power industry are described in 10 CFR Part 51. Complying with NEPA is an NRC obligation. The NRC imposes requirements on its regulated community to provide environmental information as part of an application. One important stage in the licensing history of a nuclear power reactor is the renewal of its operating license. Staff are actively engaged in reviewing license renewal applications at existing power stations. Some of the main activities involve:

- Reviewing license renewal applications (LRAs), including Environmental Reports submitted by the applicant (i.e. owner/operator of the nuclear power plant)
- Preparing site-specific Environmental Impact Statements as a Supplement (SEIS) to NUREG-1437, "Generic Environmental Impact Statement for License Renewal" (Volumes 1 and 2, May 1996, referred to as the GEIS)
- Conducting public meetings before and after the Supplemental Environmental Impact Statement is published to obtain and respond to public comments.

The NRC published regulatory guidance for staff to follow when reviewing applications to address radiological and non-radiological environmental issues called the "Environmental Standard Review Plan" (ESRP, NUREG-1555, March 2000) to ensure conformance with its review process and to share the process with stakeholders. The NRC uses a multi-disciplinary team of specialists to facilitate the review of license renewal applications.

2.0 OBJECTIVE

The overall objective of this contract is to obtain expert technical services to assist the License Renewal and Environmental Impacts Program (RLEP) in the Division of Regulatory Improvement Programs (DRIP), Office of Nuclear Reactor Regulation (NRR) staff in conducting environmental reviews of nuclear power reactors for license renewal activities and in producing technical input for preparation of Supplemental Environmental Impact Statements (SEIS, supplements to the Generic EIS, NUREG-1437) .

3.0 WORK REQUIREMENTS AND SCHEDULE

The Contractor shall perform an environmental review of, and shall prepare draft and final technical evaluation reports (TERs) for input to the SEIS for, up to two (2) nuclear power reactor license renewal application reviews. The NRC may also request a partial LRA environmental review effort within the ceiling amount of this order to facilitate the orientation process. The reviews shall conform to the requirements of ESRP, NUREG-1555, March 2000. The reports shall be written in accordance with NRC review guidance, and shall be consistent with NUREG-0650, "Publishing Documents in the NUREG Series" and NUREG-1379, "NRC Editorial Style Guide." The actual LRA assignments will be made by the NRC Project Officer (PO) through issuance of work orders.

The Contractor shall commit to the prescriptive 17-month schedule at the start of each project to work with NRC staff in participating on scouting trips, site audits, public meetings, comment binning sessions, SEIS draft and final writing sessions, and completing additional reports as directed in specific work orders.

Through the issuance of work orders, the Contractor shall submit a proposed staffing plan, draft project plan inclusive of schedule and deliverables (MS Project or similar format), and price quote within 5 working days of receipt of the work order, unless otherwise directed by the NRC PO. Upon acceptance of the project and staffing plan and quote, the PO will provide written approval to commence the work. The effort for each review will commence prior to receipt of the license renewal application to allow for performance of Task 1 orientation.

The Contractor shall follow its quality control plan which outlines the procedures and system the Contractor will use for document version control, technical input tracking, change management, and technical and editorial reviews. The Contractor shall organize, track, and manage changes in a structured, systematic, and transparent manner, throughout the review and production of each TER.

Specific work requirements including schedule for performance will be specified in the individual work orders issued in accordance with the procedures established in this Statement of Work. The standard scope of work for each review and TER preparation is described in the following Tasks:

Task 1. Orientation

NRC shall provide the Contractor with orientation on the business practice of working for NRC on environmental reviews. The Contractor team (as defined in Section 4) will attend a one-day briefing at the NRC headquarters (or at the Contractor's office) and be prepared to discuss the NRC's license renewal process for completing environmental reviews based on documents listed in Section 7.0.

The Contractor will attend and observe NRC scheduled events for other LRA projects, possibly including public meetings, site audits, and writing sessions at the direction of the NRC Technical Monitor (TM). For the purposes of bidding, assume that the Project Team Leader (PTL) will attend draft and final writing sessions (one week each) and the entire team will attend a scoping meeting and site audit (held during the same week). Further details are provided in Section 6.

Contractor performance for each review will be evaluated based on a feedback form, to be developed jointly by the Contractor and NRC within 5 days of contract award. See Section 11.

Task 2. Environmental Reviews

For each application, the Contractor shall provide a finalized project plan within 5 working days of receipt of NRC comments on the draft project plan. The plan shall include the schedule and deliverables (MS Project or similar format) for the duration of the effort. The Contractor shall also review the specified plant's LRA environmental report, and identify and organize the technical information necessary for inclusion in the TER. The TM will provide a SEIS template which is a skeleton electronic file illustrating the format of the SEIS. The Contractor shall complete camera-ready draft and final deliverables (TERs) ready to be published as a NUREG document for public review. Information contained in the SEIS is based on (1) the analysis and findings in the GEIS (NRC 1996, 1999), (2) the LRA environmental report submitted by the applicant and interviews conducted during the site audit, (3) consultation with Federal, State, and local agencies, (4) the staff's independent review (supported by Contractors), and (5) the consideration of public comments. If necessary, formal written requests for additional information will be sent by the NRC to the applicant to fill in gaps in knowledge for completing the draft SEIS. However, the NRC staff expects that most, if not all, knowledge gaps will be filled at the site audit.

NRC designates an Environmental Project Manager (PM) staff member responsible for coordinating the activities of a review team composed of NRC staff specialists in the ecological, physical, social, and radiological sciences. The NRC expertise will be supplemented with a team supplied by the Contractor as described in Section 4.0.

The Contractor shall provide one team to support license renewal review activities for successive reviews on up to two (2) nuclear power plants. The NRC may also request a partial LRA review effort within the ceiling of the order to facilitate orientation. For purposes of preparing a proposal, the bidder shall assume that the specified work will involve a plant application in the following plant sites. The actual plant assignments will be made through work orders and may differ from the listed sites. It should be noted that award of subsequent work orders will be based on the Contractor's ability to meet the review schedule, milestones, and cost of the preceding plant/review. Award of work orders is subject to the availability of funds, management approval to proceed, and successful completion of the preceding review effort.

Plant and Location	Estimated Application Receipt Date
Unnamed First Plant	June 2005
Unnamed Second plant	Fall 2006

Total time to complete each LRA project is approximately 17 months.

For each license renewal application, the Contractor shall perform the work requirements outlined in the generic schedule below to complete LRA environmental reviews: (The schedule presented below is generic and may be subject to minor adjustments for each application.)

- Receipt of License Renewal Application with Environmental Report (week 0)
- Finalization of project plan (week 3)
- Scouting trip (3 days) at power plant and surrounding area (week 3)
- Acceptance Review of Application completed (week 7)
- Draft pre-site audit report and identify list of document needs and applicant technical staff for site audit (week 14)
- Environmental site audit (3 days) of power plant and surrounding communities and governmental interactions (week 16)
- Public scoping meeting with Federal, State, and Local officials, industry, and public stakeholders (week 16)
- Requests for Information submitted to NRC (week 22)
- Scoping Meeting Summary report submitted to NRC (week 24)
- Working Draft TER (in SEIS format) documents submitted to NRC (week 34)
- Biological Assessment submitted to NRC (week 35)
- Draft writing session for revisions (week 36)
- Camera-ready draft TER (in SEIS format) submitted to NRC (week 39)
- Public meeting to discuss draft SEIS results (week 52)
- Binning public comments to provide responses (week 61)
- Working Draft Final TER (in SEIS format) documents submitted to NRC (week 66)
- Final writing session for revisions (week 68)
- Camera-ready final TER (in SEIS format) submitted to NRC (week 71)
- Project completed (week 83)

Partial review efforts will follow the generic schedule from a pre-identified point to be noted in each specific work order.

4.0 TECHNICAL AND OTHER SPECIAL QUALIFICATIONS REQUIRED

It is the responsibility of the Contractor to assign technical staff, employees, subcontractors, or specialists who have the required educational background, experience, or combination thereof to meet both the technical and regulatory objectives of the work specified in this SOW. The NRC will rely on representations made by the Contractor concerning the qualifications of the personnel assigned to this delivery order, including assurance that all information contained in the technical and cost proposal, including resumes, is accurate and truthful.

With respect to key personnel, the Contractor shall assign the Project Team Leader (PTL) to manage the project subject to the approval of the NRC Project Officer (PO) and who serves as the point-of-contact to the NRC TM and PM. The PTL holds a critical position requiring substantial involvement spending approximately six (6) months full-time effort spread over the 17-month LRA). The PTL shall be well versed in technical and managerial projects and shall be responsible for overall coordination of activities and completion of deliverables. The PTL may oversee compilation of the alternatives section (Chapter 8 of the TER) or may delegate this activity to a team member. The PTL will not take on additional responsibilities to substitute for subject matter experts.

The Contractor team shall consist of subject matter experts in the following disciplines: Air

Quality, Aquatic Ecology, Cultural & Historic Resources, Hydrology & Water Quality, Land Use, Meteorology, Radiological Protection, Socioeconomics and Terrestrial Ecology. For the purpose of bidding, assume that nine (9) subject matter experts from the required disciplines will participate on the team. In addition, the Contractor shall provide a technical editor and administrative assistant who shall follow NRC style guidance and have proficiency in use of Corel WordPerfect. The Contractor shall provide all necessary personnel, equipment, facilities and materials to accomplish the efforts placed under this contract. The use of particular personnel on this project is subject to the Technical Monitor's (TM's) approval. This includes proposed changes to key personnel during the life of the work orders.

In the event that contentions are admitted for hearing, the contract work orders may be modified to add effort for the Contractor team to reply to contentions and participate in hearings. The Contractor will assume that no hearings will occur for the purposes of the proposal bid.

If any work will be subcontracted or performed by subcontractors or consultants, the Contractor shall obtain the NRC PO's written approval of the subcontractor or consultant prior to initiation of the subcontracted effort. Conflict of interest considerations shall apply to any subcontracted effort. The use of experienced personnel for the key positions on each task under this project is essential to the success of the project.

This project may involve the development of information for review guidance, acceptance criteria, and/or bases for commercial nuclear power plant license reviews. The results of this effort have the potential to impact entities regulated by the NRC and industry organizations. The Contractor must be absolutely free from direct or the appearance of organizational conflict of interest with respect to any of the entities subject to NRC conflict of interest criteria. Approvals will be communicated to the Contractor by the NRC PO.

Key personnel cannot be changed without the approval of the NRC TM. Technical personnel shall have demonstrated expertise in their area of responsibility. The work requires degreed economists, scientists and engineers with experience in the siting of large-scale industrial and energy facilities and familiarity with nuclear power plant designs. Some work orders may require personnel with expertise in: the uranium fuel cycle; land and water use and waste management; demography and socio-economics; historic and cultural resources; terrestrial and aquatic ecology; geology and seismology; hydrology; meteorology; air and water quality; electrical shock issues from transmission lines; and routine and accident radiological risk and mitigation assessment, including severe accident mitigation alternatives (SAMAs) with experience applicable to nuclear power plants, or other large-scale energy or industrial facilities.

The Project Team Leader and subject matter experts will have demonstrated their expertise as documented in resumes, describing oral presentations at public meetings, professional conferences, management briefings, and providing expert testimony in hearings.

For each technical area, extensive information will be reviewed and evaluated for inclusion into the TERs. During the review process, which includes a site audit, the following information needs are commonly obtained by subject matter experts either from information provided by the applicant or from developed sources. The list provides some indication of the breadth of expertise required which relates to the deliverables described in Section 8.0:

Subject Area	Typical information needed to conduct technical reviews
Air Quality:	List of permitted air emission sources Records of permit compliance statues and violations Wind Rose diagrams
Hydrology, Water Use, Water Quality:	Local and regional investigations Power plant specific monitoring data Weather information State or Federal NPDES permits State groundwater protection standards Discharge permits
Health Physics, Radiological Human Health and Safety: Human Health	Offsite Dose Calculation Manual Radiological Environmental Monitoring Program Reports Radiological and non-radiological procedures for waste handling Chronic effects data of electrical shock from transmission lines
Aquatic Ecology:	Use of biocides Listed threatened and endangered species Section 316(a) Entrainment and impingement reports Section 316(b) permits per Clean Water Act
Terrestrial Ecology:	Listed threatened and endangered species Protocols for vegetation management
Land Use:	County Zoning Ordinances Planning Documents Adjacent land use reports Land use plans
Historic and Archeological Resources:	Archeological surveys Mitigation reports Correspondence from State Historic Preservation Office
Socioeconomics:	State Reports on Revenues, Energy Assessment Population projections Distribution of minority and low income census blocks Environmental Justice reports and claims Traffic and transportation study reports Education Public Services
Alternatives:	Documentation on conventional and non-conventional power systems and impacts including electric generation from gas, coal, wind, solar, and energy conservation. Includes reviewing subject areas listed above and an aesthetics analysis.

Compilation of information to conduct site audits and document findings in the draft TERs requires extensive interviewing of stakeholders including power plant personnel; elected officials; Federal, State, and local government officials; school superintendent departments; social workers; and members of the public. For example, the ecologists will review recovery plans for endangered species, prepare biological assessments as required by the Endangered Species Act, and determine whether license renewal could affect endangered or threatened species or habitats. The Contractor will interact with Fish and Wildlife Service (for freshwater or terrestrial species) and National Marine Fisheries Service (for oceanic and coastal areas). The Contractor will also interact with State and Tribal Historic Preservation Officers to identify locations and effects on historic properties. All stakeholder interactions shall be coordinated with the NRC's PM.

The Contractor will be provided internet access to "Gen&SIS", the Geographical, Environmental, & Siting Information System, developed under contract by the NRC. This system includes data and links to other Internet sites that have important information for environmental analyses. The ESRP states that, "Reviewers are expected to make use of GEn&SIS and its links to other sources of information in reviewing an applicant's ER and in performing independent analyses." The software system is the property of the Federal Government available under restricted access and cannot be used for commercial purposes.

5.0 PLACEMENT OF WORK ORDERS

The actual plant assignments or partial reviews will be made by the PO through issuance of work orders. The NRC PO will provide the Contractor with the LRA and SEIS framework and any additional related documents at initial issuance of the work order.

The Contractor will, in response to each work order, submit a staffing plan, project plan with schedule and deliverables, and price quote within 5 working days of receipt of the work order, unless otherwise directed by the PO. Upon acceptance of the quote, the PO will provide written approval to commence with the work order.

6.0 MEETINGS AND TRAVEL

Teleconferences will be typically held on a weekly to monthly basis between the PM and PTL. Progress meetings will be quarterly during any active phase of this project, at the discretion of NRC. Each of these meetings between the Project Team Leader and the NRC Technical Monitor for the contract is expected to last 1 to 2 days. The Contractor should plan to make available key personnel assigned to active tasks during the course of these meetings. Most meetings will occur at the Contractor's office. Periodically, a program review meeting, which involves NRC and Contractor senior management, will be held at the Contractors office to review overall program objectives and project performance; program reviews are typically held biennially. In addition, meetings at NRC Headquarters and technical information gathering trips may be necessary and will be identified in the "Work Requirements" section of the work order SOW.

For Task 1, the Contractor shall attend a one-day briefing held either at the NRC headquarters or at the Contractor's office and be prepared to discuss the NRC's license renewal process for completing environmental reviews based on documents. The entire Contractor team shall attend including the PTL, all subject matter experts, and the editor. Others from the company including senior management may attend.

In addition for Task 1, the Contractor shall attend and observe NRC scheduled events for other LRA projects (currently NRC support is subcontracted to DOE National Laboratories):

Site Audit/Scoping meeting: 7-people (PTL and 6 subject matter experts), 5-day trip
Draft SEIS writing session. 4-person (PTL), 5-day trip
Final SEIS writing session. 1-person (PTL), 5-day trip

Task 2

The following assumptions should be used for each LRA project to travel to the nuclear plant site:

Scouting Trip: 1-person (PTL), 5-day trip to power plant vicinity
Site Audit/Scoping meetings: 10-people (PTL and 9 subject matter experts), 5-day trip
RAI discussions: 1-person, 3-day trip
Draft SEIS meeting: 4-person, 3-day trip

Specific meeting and travel requirements will be identified in the specific work order Statement of Work. Other travel will be confirmed with the NRC PM prior to commencement of the travel.

7.0 NRC FURNISHED MATERIALS

The NRC PO will supply the manuscript template for initiating the writing and researching process. The Contractor shall be knowledgeable of the guidance documents listed here.

The NRC public website contains information on the license renewal process for safety and environmental reviews including information on regulations, guidance documents, and schedules at http://www.nrc.gov/reactors/operating/licensing/renewal.html

The NRC TM will provide the Contractor with the license renewal applications. The TM and PM can also provide other applicable background information and reference documentation (e.g. previous environmental statements for the plant). For the purpose of providing a proposal, the NRC web site below, contains samples of license renewal applications and staff SEIS documents. An example is the draft SEIS from the D.C. Cook Nuclear Plant LRA: http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1437/supplement20/index.html

The following NUREG reports related to this effort are available through the NRC Agency-wide Document Access and Management System (ADAMS):

NUREG-1379, "NRC Editorial Style Guide," is available through ADAMS at: http::://www.nrc.gov/reading-rm/adams/web-based.html (accession number ML041050307)

NUREG-650, "NRC Collection of Abbreviations," Revision 2 is available through ADAMS http://www.nrc.gov/reading-rm/adams/web-based.html (accession number ML041050544)

An electronic copy of MD 3.8 is attached to this SOW.

The NRC electronic reading room (http://www.nrc.gov/reading-rm.html) contains document collections with numerous publications pertaining to license renewal. Several staff generated

NUREG reports and Regulatory Guides are found on the same website:

NUREG-1437: Generic Environmental Impact Statement for License Renewal (GEIS), Volumes 1 and 2, 1996 and Addendum to Volume 1, 1999

NUREG-1555: Environmental Standard Review Plan (ESRP) Volumes 1 and 2 and Supplement 1. The final ESRP March 2000 (NUREG-1555) is not on the web but is available in ADAMS and on paper or CD. Supplement 1 is specifically for license renewal.

Regulatory Guide 4.2 (NUREG-0099) Preparation of Environmental Reports for Nuclear Power Stations (July 1976).

Regulatory Guide 4.2,S1 published in September 2000, supplements guidance on the format and content of an environmental report to be submitted as part of an application for the renewal of a nuclear power plant operating license.

Regulatory Guide 4.7 , "General Site Suitability Criteria for Nuclear Power Stations," (published April 1998) discusses the major site characteristics related to public health and safety and environmental issues that the NRC staff considers in determining the suitability of sites for light-water-cooled nuclear power stations.

NRC established new policy instructions on May 28, 2002 for conducting public meetings and providing information in ADAMS and on the web. A checklist is available from the TM for planning public meetings through to completion.

The following brochures and fact sheets are most relevant to the work of the Contractor. These brochures are available on the web and are distributed at the public meetings:

Brochures http://www.nrc.gov/public-involve/brochures.html

- Reactor License Renewal NUREG/BR-0291
- Public Involvement in the Nuclear Licensing Process NUREG/BR-0215
- Reporting Safety Concerns NUREG/BR-0240
- NRC: Regulator of Nuclear Safety NUREG/BR-0164
- The US NRC and How It Works NUREG/BR-0256
- Transporting Spent Fuel NUREG/BR-0111
- Regulation and Use of Radioisotopes NUREG/BR-0217
- Public Petition Process NUREG/BR-0200
- The Atomic Safety Licensing Board Panel NUREG/BR-0249
- Citizen's Guide to US NRC Information NUREG/BR-0010
- Reactor Oversight Process NUREG/BR-1649
- Nuclear Power Plant Licensing Process NUREG/BR-0298

Fact Sheets

- Nuclear Reactor Licensing Process
- License Renewal
- NRC Fact Sheet (General) NUREG/BR-0099
- Nuclear Material and Safeguards NUREG/BR-0137

8.0 DELIVERABLES

Technical Reporting Requirements

The types, quantities, and distribution of the reports will be specified in each work order. Typically, the reports will involve:

- trip reports with meeting summaries, observations, and recommendations;
- scoping summary report;
- technical letter reports that request additional or clarifying information (RAIs);
- biological assessments;
- pre-site audit, draft, and final technical evaluation reports (TERs) in SEIS format.

The transmittal letter and cover page of each report, or other deliverable, as appropriate, shall contain the job control number (JCN), work order number and title, NRC technical assignment control (TAC) number or inspection report number, and the facility name and docket number, as appropriate. TER to be used as input to SEIS shall be prepared in NUREG format.

The Contractor shall provide the following deliverables electronically to the PO and TM with one original hard copy and an electronic copy to the PM.

A. Project Plan for each plant
   Draft due: with submission of work order quote
   Final due: within 5 working days from receipt of NRC comments

B. SEIS (Task 2) Unnamed Plant #1 (for application received in June 2005)
   Draft due: November 2005
   Final due: July 2006

C. SEIS (Task 2) Unnamed Plant #2 (for application received in Fall 2006)
   Draft due: 8 months from commencement of the work
   Final due: 17 months from commencement of the work

TERs are to be delivered "camera ready" to NRC in Corel WordPerfect 10 (not a conversion from MS Word) format on CD-ROM. Figures will be in .tif format. NRC will take the electronic files and produce the published report. The Contractor will provide administrative support as needed.

Biweekly Resource Report

For cost control purposes, the Contractor shall submit bi-weekly time and labor support reports. The reports shall include itemization of time spent by individual project team members in performing schedule tasks (as outlined in the project plan). The NRC TM shall approve the format for Contractor submission of the applicable information. The completed report shall be e-mailed to the NRC TM with a copy to the PO on a bi-weekly basis.

Performance Feed-back Form

The Contractor shall provide a proposed feedback form, to address the performance requirements under Section 11, to the NRC within 5 days from contract initiation.

Monthly Status Report

The Monthly Letter Status Report (MLSR) shall be delivered to the NRC PO, with copies to the TM for the underlying contract and to other designated NRC individuals. (See attached sheets for format and content of the MLSR). The MLSR is to be issued no later than the 20th of the month and a total of the month ending (or billing cycle) costs is to be provided to the NRC Project Officer (at saa2@nrc.gov) no later than the 15th of the month.

The Contractor shall provide a monthly Technical Progress Report to the PO and the contracting officer. The report is due within 15 calendar days after the end of the report period and must identify the title of the project, the contract number, appropriate financial tracking code specified by the NRC PO, Contractor PTL, the contract period of performance, and the period covered by the report. Each report must include the following for each discrete task/work order:

(a) A listing of the efforts completed during the period, and milestones reached or, if missed, an explanation provided;

(b) Any problems or delays encountered or anticipated and recommendations for resolution. If the recommended resolution involves a contract modification, e.g., change in work requirements, level of effort (cost) or schedule delay, the Contractor shall submit a separate letter to the contracting officer identifying the required change and estimated cost impact;

©) A summary of progress to date; and

(d) Plans for the next reporting period.

FINANCIAL STATUS REPORT

The Contractor shall provide a monthly Financial Status Report (FSR) to the PO and the contracting officer. The FSR is to be issued no later than the 20th of the month along with the MLSR to be provided to the NRC Project Officer (at saa2@nrc.gov) no later than the 15th of the month The FSR shall include the acquisition of, or changes in the status of, Contractor-held property acquired with government funds valued at the time of purchase at $50,000 or more. Whenever these types of changes occur, the Contractor shall send a copy of the report to the Chief, Property and Acquisition Oversight Branch, Office of Administration. The report is due within 15 calendar days after the end of the report period and shall identify the title of the project, the contract number, project manager and/or principal investigator, the contract period of performance, and the period covered by the report. Each report shall include the following information for each discrete task:

(a) Total estimated contract amount.

(b) Total funds obligated to date.

(c) Total costs incurred this reporting period.

(d) Total costs incurred to date.

(e) Detail of all direct and indirect costs incurred during the reporting period for the entire contract or each task, if it is a work ordering contract.

(f) Balance of obligations remaining.

(g) Balance of funds required to complete contract/work order.

(h) Property status:

(1) List property acquired for the project during the month with an acquisition cost between $500 and $49,999. Give the item number for the specific piece of equipment. Property acquisition with a cost of $500 or more requires the approval of the PO.

(2) Provide a separate list of property acquired for the project during the month with an acquisition cost of $50,000 or more. Provide the following information for each item of property: item description or nomenclature, manufacturer, model number, serial number, acquisition cost, and receipt date. If no property was acquired during the month, include a statement to that effect. The same information must be provided for any component or peripheral equipment which is part of a 'system or system unit.'

(3) For multi-year projects, in the September monthly financial status report provide a cumulative listing of property with an acquisition cost of $50,000 or more showing the information specified in paragraph (h)(3) of this clause.

(4) In the final financial status report provide a closeout property report containing the same elements as described above for the monthly financial status reports, for all property purchased with NRC funds regardless of value unless title has been vested in the Contractor. If no property was acquired under the contract, provide a statement to that effect. The report should note any property requiring special handling for security, health, safety, or other reasons as part of the report.

(I) Travel status: List the starting and ending dates for each trip, the starting point and destination, and the traveler(s) for each trip.

(j) If the data in this report indicates a need for additional funding beyond that already obligated, this information may only be used as support to the official request for funding required in accordance with the Limitation of Cost (LOC) Clause (FAR 52.232-20) or the Limitation of Funds (LOF) Clause FAR 52.232-22.

License Fee Recovery

This contract will support work that is license fee recoverable under 10 CFR Parts 170 and 171; the type of fee will be identified on individual work orders.

9.0 PERIOD OF PERFORMANCE

The period of performance is September 29, 2005, through September 28, 2008.

10.0 PERFORMANCE REQUIREMENTS

Contractor performance for each review will be evaluated based on a feedback form, to be developed jointly by the Contractor and NRC within 5 days of contract award, and will be rated using three categories based on the following criteria:

1) any complaints received regarding conduct during interactions with NRC staff, industry staff, or members of the public

Unacceptable: Any significant complaints
Acceptable: One minor complaint
Outstanding: No complaints

2) Preparedness with draft sections written **prior** to the site audit and list of information needs

Unacceptable: No draft section written and list of information needs not provided
Acceptable: Draft section completed 1 week before site audit with list of information needs (e-mailed to PM)
Outstanding: Draft section completed 2 weeks before site audit with list of information needs

3) Formal Requests for Information letter must be written by NRC because required information was not identified by the Contractor or obtained at site audit requiring additional responses by applicant after the site audit.

Unacceptable: Two rounds for formal RAIs
Acceptable: Only informal requests for information via teleconference following site audit
Outstanding: No formal or informal requests for information

4) Timeliness

Unacceptable: Any deliverables provided to NRC after the date of agreed deadline
Acceptable: All deliverables provided to NRC on the day of agreed deadline
Outstanding: All deliverables provided to NRC one week prior to agreed upon deadline

5) Quality of SEIS deliverable products

Unacceptable

Document is judged *unacceptable* for submission to NRC staff for publishing (i.e., camera-ready). Document will be returned to the Contractor for rework, at the Contractor's expense, with a one (1) week turnaround. Written explanation of the steps taken to prevent future unacceptable submittals is expected by Contractor within 30 days of the document return.

To be judged UNACCEPTABLE a document meets one or more of the following performance standards:

A. More than three (3) unrelated factual errors material to an NRC decision.

B. More than 40 format or editorial (spelling, grammar, capitalization, hyphenating, etc.) errors, or one or more sections due from the consultant team missing.

C. Did not incorporate more than two (2) changes discussed and agreed upon at the writing session or in succeeding documented conversations with the PM.

D. Table A-2 of the TER to serve as the Final SEIS contains more than two (2) errors in the tracking of comments through the appendix.

E. More than one (1) reprinted documents (in pdf format) are illegible, or contain multiple pages of extraneous information.

F. More than one (1) instance of significant dropped text of more than a few words.

Acceptable

A quality document that clearly has received substantial review both editorially and technically. Document requires minimal changes with no significant errors.

To be judged ACCEPTABLE a document satisfies all of the performance standards:

A. No factual errors material to an NRC decision.

B. Thirty (30) or less format or editorial errors.

C. Did incorporate all changes discussed at the writing session or during succeeding documented conversations with the PM.

D. No tracking errors in Table A-2 of a TER to serve as the Final SEIS.

E. Appendices formatted correctly and all reprinted documents legible, arranged correctly and no extraneous material.

F. No instance of significant dropped text.

Outstanding

Exceptional document that is ready for publishing. Document modification almost completely confined to NRC discretional changes.

To be judged OUTSTANDING a document satisfies all of the following performance standards:

A. No factual errors.

B. Fifteen (15) or less format or editorial errors.

C. Did incorporate all changes discussed at the writing session or during succeeding documented conversations with the EPM.

D. All appendices formatted correctly and all reprinted documents legible, arranged correctly and no extraneous material.

E. No instance of dropped text.

Award of the second work order under this effort is dependent on acceptable Contractor performance ratings for the first effort/work order.

ORDER TERMS AND CONDITIONS

A. PROJECT OFFICER

The Contracting Officer's authorized technical representative hereinafter referred to as the project officer for this contract is:

Project Officer: Sally A. Adams (saa2@nrc.gov)
(301) 415-0209
Office of Nuclear Reactor Regulation
Mail Stop: O-12E5
Washington, D. C. 20555

Technical Monitor: Robert Schaaf (rgs@nrc.gov)
(301) 415-1312
Office of Nuclear Reactor Regulation
Mail Stop: O-11F1
Washington, D.C. 20555

a. Performance of the work under this contract is subject to the technical direction of the NRC Project Officer and Technical Monitor. The term "technical direction" is defined to include the following:

1. Technical direction to the Contractor which shifts work emphasis between areas of work or tasks, authorizes travel which was unanticipated in the Schedule (i.e., travel not contemplated in the Statement of Work or changes to specific travel identified in the Statement of Work), fills in details, or otherwise serves to accomplish the contractual statement of work.

2. Provide advice and guidance to the Contractor in the preparation of drawings, specifications, or technical portions of the work description.

3. Review and, where required by the order, approval of technical reports, drawings, specifications, and technical information to be delivered by the Contractor to the Government under the order.

b. Technical direction must be within the general statement of work stated in the order. The project officer and technical monitor do not have the authority to and may not issue any technical direction which:

1. Constitutes an assignment of work outside the general scope of the order

2. Constitutes a change as defined in the "Changes" clause of the GSA contract.

3. In any way causes an increase or decrease in the total fixed price or the time required for performance of any orders.

4. Changes any of the expressed terms, conditions, or specifications of the contract.

5. Terminates the order, settles any claim or dispute arising under the order, or issues any unilateral directive whatever.

c. All technical directions must be issued in writing by the technical monitor or project officer or must be confirmed by the project officer in writing within ten (10) working days after verbal issuance. A copy of the written direction must be furnished to the CO. A copy of NRC Form 445, Request for Approval of Official Foreign Travel, which has received final approval from the NRC must be furnished to the CO.

d. The Contractor shall proceed promptly with the performance of technical directions duly issued by the project officer in the manner prescribed by this clause and within the project officer's authority under the provisions of this clause.

e. If, in the opinion of the Contractor, any instruction or direction issued by the project officer is within one of the categories as defined in paragraph ©) of this section, the Contractor may not proceed but shall notify the CO in writing within five (5) working days after the receipt of any instruction or direction and shall request the CO to modify the contract or associated BPA accordingly. Upon receiving the notification from the Contractor, the CO shall issue an appropriate modification or advise the Contractor in writing that, in the CO's opinion, the technical direction is within the scope of this article and does not constitute a change under the "Changes" clause.

f. Any unauthorized commitment or direction issued by the project officer may result in an unnecessary delay in the Contractor's performance and may even result in the Contractor expending funds for unallowable costs under the contract or associated BPA.

g. A failure of the parties to agree upon the nature of the instruction or direction or upon the contract action to be taken with respect thereto is subject to 52.233-1 - Disputes.

h. In addition to providing technical direction as defined in paragraph (b) of the section, the project officer shall:

1. Monitor the Contractor's technical progress, including surveillance and assessment of performance, and recommend to the CO changes in requirements.

2. Assist the Contractor in the resolution of technical problems encountered during performance.

3. Review all costs requested for reimbursement by the Contractor and submit to the CO recommendations for approval, disapproval, or suspension of payment for supplies and services required under orders.

4. Assist the Contractor in obtaining the badges for the Contractor personnel.

5. Immediately notify the Personnel Security Branch, Division of Facilities and Security (PERSEC/DFS) (via e-mail) when a Contractor employee no longer requires access authorization and return the individual's badge to PERSEC/DFS within three days after their termination.

B. KEY PERSONNEL

(a) The following individuals are considered to be essential to the successful performance of the work hereunder:

Project Team Leader:	J. Szeligowski
Aquatic Ecologist:	S. Duda
Terrestrial Ecologist:	J. Briggs

The Contractor agrees that personnel may not be removed from the contract work or replaced without compliance with paragraphs (b) and ©) of this section.

(b) If one or more of the key personnel, for whatever reason, becomes, or is expected to become, unavailable for work under this contract for a continuous period exceeding 30 work days, or is expected to devote substantially less effort to the work than indicated in the proposal or initially anticipated, the Contractor shall immediately notify the contracting officer and shall, subject to the concurrence of the contracting officer, promptly replace the personnel with personnel of at least substantially equal ability and qualifications.

(c) Each request for approval of substitutions must be in writing and contain a detailed explanation of the circumstances necessitating the proposed substitutions. The request must also contain a complete resume for the proposed substitute and other information requested or needed by the contracting officer to evaluate the proposed substitution. The contracting officer and the project officer shall evaluate the Contractor's request and the contracting officer shall promptly notify the Contractor of his or her decision in writing.

(d) If the contracting officer determines that suitable and timely replacement of key personnel who have been reassigned, terminated, or have otherwise become unavailable for the contract work is not reasonably forthcoming, or that the resultant reduction of productive effort would be so substantial as to impair the successful completion of the contract or the service order, the contract may be terminated by the contracting officer for default or for the convenience of the Government, as appropriate. If the contracting officer finds the Contractor at fault for the condition, the contract price or fixed fee may be equitably adjusted downward to compensate the Government for any resultant delay, loss, or damage.

C. BILLING INSTRUCTIONS

General: The Contractor shall prepare vouchers or invoices as prescribed herein. FAILURE TO SUBMIT VOUCHERS/INVOICES IN ACCORDANCE WITH THESE INSTRUCTIONS WILL RESULT IN REJECTION OF THE VOUCHER/INVOICES AS IMPROPER.

Form: Claims shall be submitted on the payee's letterhead, voucher/invoices, or on the Government's Standard Form 1034, "Public Voucher for Purchases and Services Other than Personal," and Standard Form 1035, "Public Voucher for Purchases Other than Personal--Continuation Sheet." These forms are available from the U.S. Government Printing Office, 710 North Capitol Street, Washington, DC 20401.

Number of Copies: An original and three copies shall be submitted. Failure to submit all the required copies will result in rejection of the voucher/invoice as improper.

Designated Agency Billing Office: Vouchers/Invoices shall be submitted to the following address:

U.S. Nuclear Regulatory Commission
Division of Contracts - T-7-I-2
Washington, DC 20555-0001

A copy of any invoice which includes a purchase of property valued at the time of purchase at $5,000 or more, shall additionally be sent to:

Chief, Property Management Branch
Division of Facilities and Property Management
Mail Stop - T-7-D-27
Washington, DC 20555-0001

HAND-DELIVERY OF VOUCHERS/INVOICES IS DISCOURAGED AND WILL NOT EXPEDITE PROCESSING BY THE NRC. However, should you choose to deliver vouchers/invoices by hand, including delivery by any express mail service or special delivery service which uses a courier or other person to deliver the vouchers/invoices in person to the NRC, such vouchers/invoices must be addressed to the above Designated Agency Billing Office and will only be accepted at the following location:

U.S. Nuclear Regulatory Commission
One White Flint North - Mail Room
11555 Rockville Pike
Rockville, MD 20852

HAND-CARRIED SUBMISSIONS WILL NOT BE ACCEPTED AT OTHER THAN THE ABOVE ADDRESS

Note that the official receipt date for hand-delivered vouchers/invoices will be the date it is received by the official agency billing office in the Division of Contracts.

Agency Payment Office: U.S. Nuclear Regulatory Commission
Division of Accounting and Finance GOV/COMM
Mail Stop T-9H4
Washington, DC 20555

Frequency: The Contractor shall submit a voucher or invoice monthly only after the NRC's acceptance of services rendered or products delivered in performance of the contract unless otherwise specified in the contract.

Preparation and Itemization of the Voucher/Invoice: To be considered a proper voucher/invoice, all of the following elements must be included:

1. Contract number and work order number.

2. Sequential voucher/invoice number.

3. Date of voucher/invoice.

4. Payee's name and address. (Show the name of the Contractor and its correct address. In addition, when an assignment of funds has been made by the Contractor, or a different payee has been designated, include the name and address of the payee). Indicate the name and telephone number of the individual responsible for answering questions which the NRC may have regarding the voucher/invoice.

5. Description of articles or services, quantity, unit price, total amount, and cumulative amount.

   For labor-hour delivery orders with a ceiling, provide a breakdown by work order of labor hours by labor category, hours, fixed rate, current period dollars, and cumulative hours and dollars billed to date as authorized under the delivery order. For example:

Category	Current Hours	Fixed Rate	Current Billed	Cumulative Hours	Billed
Scientist	100	35.00	3,500.00	500	17,500.00
Engineer	100	25.00	2,500.00	100	2,500.00
Total:	200		6,000.00	600	20,000.00

   Invoices for the order shall be broken down by task. You must also provide a consolidated summary (cover sheet) of the total amount billed inclusive of all tasks. The summary must contain the cumulative amount invoiced to date.

6. For Contractor acquired property (if authorized under the order) list each item purchased costing $50,000 or more and having a life expectancy of more than 1 year and provide: (1) an item description, (2) manufacturer, (3) model number, (4) serial number, (5) acquisition cost, (6) date of purchase, and (7) a copy of the purchasing document.

7. Weight and zone of shipment, if shipped by parcel post.

8. Charges for freight or express shipments. Attach prepaid bill if shipped by freight or express.

9. Instructions to consignee to notify the Contracting Officer of receipt of shipment.

10. Travel Reimbursement (if applicable)

The Contractor shall submit claims for travel reimbursement as a separate item on its fixed-price invoice/voucher in accordance with the following:

Travel reimbursement. Total costs associated with each trip must be shown in the following format:

Start Date	Destination	Costs
From:	From:	
To:	To:	$

Provide supporting documentation (receipts) for travel expenditures in excess of $75.00 in an attachment to the invoice/voucher.

Billing of Cost After Expiration of Order: If costs are incurred during the contract period and claimed after the contract has expired, the period during which these costs were incurred must be cited. To be considered a proper expiration voucher/invoice, the Contractor shall clearly mark it "EXPIRATION VOUCHER" or "EXPIRATION INVOICE."

Currency: Billings may be expressed in the currency normally used by the Contractor in maintaining his accounting records and payments will be made in that currency. However, the U.S. dollar equivalent for all vouchers/invoices paid under the contract may not exceed the total U.S. dollars authorized under the order.

Supersession: These instructions supersede any previous billing instructions.

D. COMPLIANCE WITH U.S. IMMIGRATION LAWS AND REGULATIONS

NRC Contractors are responsible to ensure that their alien personnel are not in violation of United States Immigration and Naturalization (INS) laws and regulations, including employment authorization documents and visa requirements. Each alien employee of the Contractor must be lawfully admitted for permanent residence as evidenced by Alien Registration Receipt Card Form 1-151 or must present other evidence from the Immigration and Naturalization Services that employment will not affect his/her immigration status. The INS Office of Business Liaison (OBL) provides information to Contractors to help them understand the employment eligibility verification process for non-US citizens. This information can be found on the INS website, http://www.ins.usdoj.gov/graphics/services/employerinfo/index.htm#obl.

The NRC reserves the right to deny or withdraw Contractor use or access to NRC facilities or its equipment/services, and/or take any number of contract administrative actions (e.g., disallow costs, terminate for cause) should the Contractor violate the Contractor's responsibility under this clause.

DRAFT, REVISION 2, JUNE 15, 2004

Plain English Guidelines for Preparing Audit and Review Reports

The purpose of this document is to provide guidance for documenting the audits and reviews of license renewal applications (LRAs) that are performed by Section B of the License Renewal and Environmental Impacts Program (RLEP-B) and to enhance consistency, quality, and completeness of the audit and review reports.

All work performed by the project team must be documented in an audit and review report. The following guidelines address the preparation of the reports. Each project team member should become familiar with the guidelines *before* performing an audit and review. This will ensure that he/she collects sufficient information during the audit and review to prepare his/her input to the report. After the audit and review report is completed, it will be used to prepare a safety evaluation report (SER) input.

GENERAL

1. ***Report writing.*** Each project team member *must* prepare the report input for the audit and review activities that he or she performed. The contractor should collect the individual report inputs, and should assemble and compile the inputs into a coherent and internally consistent report.

2. ***Follow the prepared staff direction and guidance.*** The project team should follow these guidelines and the team leader's direction in preparing the audit and review report. Questions concerning report preparation should be directed to the NRC project team leader.

3. ***Report format and content.*** The general format and content for the audit and review report are shown in the attachment to these guidelines. The report should be a stand-alone document. It should identify all submittals and other documents (e.g., FSAR, staff guidance documents, etc.) that were reviewed or used as a basis for evaluating the licensee's program.

4. ***Report model.*** In general, previously published audit and review reports can be used as models for preparing audit and review reports. Such reports will provide insights on the appropriate level of detail for the reports, information on how specific issues were handled and documented, and information on regulatory language and style. Using previously published reports as models will also facilitate preparation of the SER input after the report is completed. Previously issued requests for additional information (RAIs) and SERs may also provide insights about how to address and document activities, programs, or issues that have not been documented in previous audit and review reports.

5. ***Use existing documents and material - minimize creativity.*** Typically, the work performed by the project team has been done many times before. When preparing report input, the team members should use existing (previously prepared and previously reviewed and approved) documentation and materials to the extent practicable. For example, they should cut and paste from the LRA, the guidance documents, previous audit and review reports, previous SERs, etc. The material should be edited as appropriate for internal consistency, flow, and context.

6. ***General.*** In preparing the report, the team members should bear in mind that the report is for the information and use of individuals that were not involved in the audit and review process. As such, it needs a certain context, flow, and logic to support the readers understanding of what the project team did and what they concluded.

7. ***Use plain English.*** Use plain English.

TECHNICAL AND PROCESS

8. ***Threshold for documenting interactions between the project team and the applicant.*** In general, the team should not document each discussion with the applicant (the so called "he said, she said" or "question and answer" material) in its report. However, the team should *document interactions that caused the applicant to change a program or activity.* For purposes of these guidelines, changes to programs and activities can be of two general types:

   A. those that require that the applicant submit a supplement to its LRA or formally respond to a RAI to resolve a question or issue– an example is a revision to an AMP described in the LRA–and

   B. those that do not involve a submittal but require that the applicant revise an on-site document to resolve a question or issue. Examples include revisions to bases documents and implementing procedures.

   For both types of programs and activities, the team should document the nature of the issue, the applicant's response to the issue (e.g., agreement or disagreement), and the action that the applicant took to address or resolve the issue. For example:

   > The project team identified a difference in the detection of aging effects element. The applicant claimed that its AMP will detect aging effects prior to loss of component intended function through Type A integrated leak rate tests (ILRT) and Type B ILRT, while the GALL AMP states that only the leak-tightness and structural integrity of the containment are demonstrated through ILRT. ILRT by itself does not provide information that would indicate that aging degradation has initiated or that the capacity of the containment may have been reduced for other types of loads. The applicant agreed with the project team and committed to revise the aging effects element of the AMP to make it consistent with the GALL AMP. In a letter dated September 24, 2003, the applicant committed to implement XI.S1 (IWE) and XI.S2 (IWL). IWE and IWL are acceptable components of a containment inservce inspection

program. On the basis of this change, the applicant's AMP is now consistent with the GALL AMP and is, therefore, acceptable.

9. ***Documents reviewed by the project team.*** Documents reviewed by the project team fall into two general categories: key documents and supporting documents. A key document is one that contains information that directly supports the teams review and is used by the team to verify the applicant's claims of consistency with the GALL Report. Such documents typically include the LRA and the applicant's basis documents. Supporting documents typically provide clarifying information. They could include, as examples, implementing procedures, condition reports, and drawings.

   The documents reviewed by the project team must be captured in two places in the report. First, the key documents must be explicitly mentioned in the body of the report, in the section of the report that documents the results of the team's review of the particular AMP or AMR. The report writeups should include full citations for the key documents as well as a brief discussion of the contents of the documents and their relevance to the team's review. Following is an example for an AMP writeup:

   > In Appendix B, Section B.1.12 of the LRA, the applicant stated that its 10 CFR 50 Appendix J leak rate testing program is consistent with GALL XI.S4, "10 CFR 50 Appendix J." The project team reviewed Section 7.2 of Technical Report TR00170-003, "Structures Aging Management Review for License Renewal," Revision 0, dated July 3, 2002. Section 7.2 of this report describes the applicant's aging management program contained in Appendix B.1.12 of the LRA.

   In addition, all key *and* supporting documents must be included in the attachment to the report that lists the documents reviewed by the project team (typically, Attachment 5). Again, this applies to both AMPs and AMRs. This document list should be arranged by report section and should include the full citation for each document as specified in Item 20, below.

10. ***Documenting GALL exceptions and enhancements.*** First, briefly state the GALL criteria and then state the exception or enhancement proposed by the applicant. The team *must* document its bases for accepting exceptions to GALL and plant specific programs.

11. ***Documenting evaluations.*** The evaluation should (1) clearly explain why the proposed program or activity satisfies the applicable regulatory guidance and regulatory requirements and (2) provide a clear link to the conclusions reached by the team, as documented in the conclusion section.

12. ***Operating experience.*** Industry and plant-specific operating experience is an area of emphasis for review. It is reviewed to identify aging effects requiring management that are not identified by the industry guidance documents and to confirm the effectiveness of aging management programs. The team members should consider the industry guidance when assessing operating experience, in formulating questions for the applicant, and in

documenting the review. The industry guidance (from NEI 95-10, Revision 3) is as follows.

A. Operating Experience - Aging Effects Requiring Management. A plant-specific operating experience review should assess the operating and maintenance history. A review of the prior five to 10 years of operating and maintenance history should be sufficient. The results of the review should confirm consistency with documented industry operating experience. Differences with previously documented industry experience such as new aging effects or lack of aging effects allow consideration of plant-specific aging management requirements.

B. Operating Experience With Aging Management Programs. Plant-specific operating experience with existing programs should be considered. The operating experience of aging management programs, including past corrective actions resulting in program enhancements or additional programs, should be considered. The review should provide objective evidence to support the conclusion that the effects of aging will be managed so that the intended function(s) will be maintained during the extended period of operation. Guidance for reviewing industry operating experience is presented in BTP RLSB-1 in Appendix A.1 of the Branch Technical Positions in NUREG-1800.

C. Industry Operating Experience. Industry operating experience and its applicability should be assessed to determine whether it changes plant-specific determinations. NUREG-1801 is based upon industry operating experience prior to its date of issue. Operating experience after the issue date of NUREG-1801 should be evaluated and documented as part of the aging management review. In particular, generic communications such as a bulleting or an information notice should be evaluated for impact upon the AMP. The evaluation should check for new aging effects or a new component or location experiencing an already identified aging effect.

13. ***Applicant commitments.*** Like documents, the project team must capture each commitment that it reviewed in two places in the report. First, each commitment must be discussed in the body of the report. This should include the nature of the commitment and where it was made by the applicant (e.g., LRA, UFSAR supplement, letter, etc.). Second, each commitment must be included in the report attachment (typically Attachment 6) that summarizes the commitments reviewed by the project team. This information will transfer directly into the SER input.

14. ***Reviews that involve NRC-approved precedents.*** To help facilitate the staff review of its LRA, an applicant may reference NRC-approved precedents to demonstrate that certain non-GALL programs correspond to programs that the staff had approved for other plants during its review of previous applications for license renewal. It is not acceptable to simply refer to an NRC-approved precedent as the basis for accepting the applicant's program that is based on a precedent. Thus, report statements like the following are *not* acceptable: "The applicant cited the [previously approved precedent] established in the SER for ANO-1. The project team finds this acceptable."

15. ***Documenting conclusions.*** Standardized conclusion statements should be used throughout the report for each of the review variations encountered (e.g., consistent with the GALL Report, consistent with the GALL Report with exceptions, plant specific, etc.) by the project team. *In no case should a precedent be explicitly discussed in a conclusion.* Examples of acceptable conclusion statements include:

A. ***For a GALL program*** "On the basis of its audit and review of the applicant's program, the project team finds that those portions of the program for which the applicant claims consistency with the GALL program are consistent with the GALL program. Since the GALL program is acceptable to the staff, the project team concludes that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB during the period of extended operation, as required by 10 CFR 54.21(a)(3). On the basis of its review of the UFSAR supplement for this AMP, the project team also finds that it provides and adequate summary description of the program, as required by 10 CFR 54.21(d)."

B. ***For a GALL program with an open or confirmatory item:*** "On the basis of its audit and review of the applicant's program, pending satisfactory resolution of Confirmatory Item ____ [and/or Open Item ____] the project team finds that those portions of the program for which the applicant claims consistency with the GALL program are consistent with the GALL program. Since the GALL program is acceptable to the staff, the project team concludes that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB during the period of extended operation, as required by 10 CFR 54.21(a)(3). On the basis of its review of the UFSAR supplement for this AMP, the project team also finds that it provides and adequate summary description of the program, as required by 10 CFR 54.21(d)."

C. ***For a GALL program with exceptions:*** "On the basis of its audit and review of the applicant's program, the project team finds that those portions of the program for which the applicant claims consistency with the GALL program are consistent with the GALL program. In addition, on the basis of its review of the exceptions to the GALL program, the project team finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB during the period of extended operation, as required by 10 CFR 54.21(a)(3). On the basis of its review of the UFSAR supplement for this AMP, the project team also finds that it provides an adequate summary description of the program, as required by 10 CFR 54.21(d)."

A conclusion like the above can be modified to include an open or confirmatory item, as documented in subsection 15.B, above.

D. ***For a GALL program with enhancements:*** "On the basis of its audit and review of the applicant's program, the project team finds that those portions of the program for which the applicant claims consistency with the GALL program are consistent with the GALL program. In addition, on the basis of its review of the enhancement to the

GALL program, the project team finds that the applicant's program provides for adequate management of the aging effects for which the program is credited so that the intended functions will be maintained consistent with the CLB during the period of extended operation, as required by 10 CFR 54.21(a)(3). On the basis of its review of the UFSAR supplement for this AMP, the project team also finds that it provides and adequate summary description of the program, as required by 10 CFR 54.21(d)."

A conclusion like the above can be modified to include an open or confirmatory item, as documented in subsection 15.B, above.

E. ***For a GALL program with exceptions and enhancements:*** "On the basis of its audit and review of the applicant's program, the project team finds that those portions of the program for which the applicant claims consistency with the GALL program are consistent with the GALL program. In addition, on the basis of its review of the clarifications, exceptions, and enhancements to the GALL program, the project team finds that the applicant's program provides for adequate management of the aging effects for which the program is credited so that the intended functions will be maintained consistent with the CLB during the period of extended operation, as required by 10 CFR 54.21(a)(3). On the basis of its review of the UFSAR supplement for this AMP, the project team also finds that it provides and adequate summary description of the program, as required by 10 CFR 54.21(d)."

A conclusion like the above can be modified to include an open or confirmatory item, as documented in subsection 15.B, above.

F. ***When GALL recommends further evaluation:*** "On the basis of its audit and review, the project team finds that the applicant appropriately evaluated AMR results involving [*the issue for which GALL recommends further evaluation*], as recommended in the GALL Report. Since the applicant's AMR results are otherwise consistent with the GALL Report, the project team finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB during the period of extended operation, as required by 10 CFR 54.21(a)(3)."

G. ***For a program that is not based on a GALL program*** "On the basis of its audit and review of the applicant's program, the project team finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB during the period of extended operation, as required by 10 CFR 54.21(a)(3). On the basis of its review of the UFSAR supplement for this AMP, the project team also finds that it provides and adequate summary description of the program, as required by 10 CFR 54.21(d)."

16. ***Applicant actions that exceed NRC requirements or guidance.*** In the draft reports for some of the pilot plants, the team noted that the applicant had committed to actions that exceed those needed to satisfy NRC requirements or guidance. The reports also noted that the team had advised the applicant that it did not need to perform these voluntary

actions. Project team member should not inform the applicant that it does not need to perform voluntary actions that exceed those needed to satisfy NRC requirements or guidance. Moreover, since such discussions should not take place, they should not be documented in the team's report.

FORMAT AND STYLE

17. ***NRC Editorial Style Guide.*** Follow the *NRC Editorial Style Guide* (NUREG-1379) and the following guidance to ensure consistency in such report features as abbreviations, capitalization, compound words, numbers, symbols, punctuation, references, etc. Refer to the *United States Government Printing Office Style Manual* for style information not covered in the *NRC Editorial Style Guide* or these guidelines. Questions concerning editorial style should be directed to the NRC project team leader.

18. ***The active voice should predominate.*** It should not be difficult for the reader to tell who did what. Therefore, although there are legitimate uses for the passive voice, it should be used sparingly and the active voice should predominate. For example, statements like the following may confuse the reader: "The plant-specific operating experience was reviewed ..." The reader is left to guess who reviewed the operating experience; the applicant or the project team. Any confusion is easily eliminated by simply restructuring the sentence such as "The project team reviewed the operating experience..." or "The applicant reviewed the operating experience..."

19. ***Who said what, and where?*** Statements like "the applicant stated [something]" add confusion because the reader can not tell in what context the applicant made the statement. It could have been made in the license renewal application, in a letter, in a basis document, or during a conversation with a team member. In its report, the team needs to be clear about who said what, in what context, using what vehicle.

20. ***References and documents reviewed by project team.*** When citing or listing references and documents used or reviewed by the team, include, as appropriate, the author, number, title, volume, page numbers, revision number, and date.

21. ***Word usage.*** Don't use "LRA AMP." Rather, use, for example, "[plant name] AMP" or "AMP for [plant name]," or ".... the applicant described its AMP." Apply the same style rule to the use of AMR.

22. ***Acronyms and abbreviations.*** Spell out the first use of all acronyms and abbreviations; even such common ones as NRC.

23. ***Capitalization.*** The use of capitalization should be kept to a minimum and should follow the rules in the *NRC Editorial Style Guide*. Such words and terms as team leader, license renewal application, safety evaluation report, etc., should not be capitalized. In addition, programs should be lower case unless the program name is used in the context of a title. As examples:

    Okay The applicant's bolting integrity program is discussed in LRA Section B.1.1, "Bolting Integrity Program."

Okay The applicant's boric acid corrosion (BAC) prevention program is discussed in LRA Section B.2.1, "Boric Acid Corrosion Prevention Program." The applicant states that the program is consistent with GALL program XI.M.10, "Boric Acid Corrosion," with several enhancements which it will make prior to the period of extended operation.

Not okay The applicant provided its FSAR supplement for the Diesel Fuel Monitoring program in Section A.2.1.7 of the LRA.

24. ***Citations.*** When a reference or a document is first introduced in the report, use a complete citation (e.g., "Standard Review Plan for Review of License Renewal Application for Nuclear Power Plants" (SRP-LR), dated July 2001). Use the short form of the citation (e.g., SRP-LR) throughout the remainder of the report.

25. ***Provide ADAMS accession numbers*** for all documents that have them. For example:

    By letter dated October 14, 2003 (ADAMS Accession Number ML0328904920), Entergy Operations, Inc. (Entergy, the applicant) submitted to the U.S. Nuclear Regulatory Commission (NRC) its application for renewal of Operating License NPF-6 for Arkansas Nuclear One, Unit 2 (ML032890506, ML032930193, and ML032930198).

26. ***References to docketed correspondence.*** References to correspondence submitted by the applicant to address issues should be presented as follows: "By letter dated ____, (MLXXXXXXXXXX), the applicant stated that it had revised AMP B.1.12 to include..."

27. ***Consistent use of terminology and presentation of material.*** Terminology and presentation of material (e.g., references) should be both internally and externally consistent. i.e., there should be consistency in terminology between the NRC guidance documents, the audit plan, the audit report, and the SER input. Examples include:

    A. Use program <u>elements</u> not program <u>attributes</u>

    B. Use "NRC-approved precedent" not "previously approved precedent" or other characterization.

    C. Use the following convention (as examples) when citing references:

    - Title 10 of the *Code of Federal Regulations*, Part 54 (10 CFR Part 54), "Requirements for Renewal of Operating Licenses for Nuclear Power Plants"
    - NUREG-1800, "Standard Review Plan for Review of License Renewal Application for Nuclear Power Plants" (SRP-LR), dated July 2001

    D. Don't use "<u>matches</u> the GALL AMP." Use "<u>consistent with</u> the GALL AMP."

    E. Don't use "no significant differences with..." Use "consistent with..."

Format and Content of Audit and Review Report

This attachment is taken from Section 6.3.1 of the RLEP-B template for preparing an audit and review plan.

6.3.1. Audit and review report

1. Format and content of the audit and review report. The report should include the following:

   A. Cover page
   B. Table of contents
   C. Section 1, Introduction
   D. Section 2, Background
   E. Section 3, Summary of Information in the License Renewal Application
   F. Section 4, Audit and Review Scope
   G. Section 5, Audit and Review Process
   H. Section 6, Exit Meeting
   I. Section 7, Audit and Review Results
      (1) Section 7.1, Aging Management Programs
      (2) Section 7.2, Aging Management Reviews
   J. Attachment 1, Acronyms and Initialisms
   K. Attachment 2, Project Team and Applicant Personnel
   L. Attachment 3, Elements of an Aging Management Program for License Renewal
   M. Attachment 4, Disposition of Requests for Additional Information, LRA Supplements, and Open Items
   N. Attachment 5, List of Documents Reviewed
   O. Attachment 6, List of Commitments

2. The following paragraphs describe, in general, the type of information and the level of detail necessary for each report section.

   A. A cover page that identifies the following:
      (1) name of the plant and units
      (2) docket number of the plants
      (3) organization preparing the report
      (4) contract number under which the work was performed
      (5) statement that the report was prepared for the License Renewal and Environmental Impacts Program, Division of Regulatory Improvement Programs, Office of Nuclear Reactor Regulation
      (6) issue date
   B. Table of Contents.
   C. Section 1, Introduction. This section of the report should provide an overview of the audit and review conducted by the project team. It should also list key audit and review activities, including site visits, and the organizations supporting the audit and review.
   D. Section 2, Background. This section of the report should include a summary of the license renewal requirements as stated in the *Code of Federal Regulations* and a summary of the documents that the project team used to carry out the audit and

review. This section of the report should be taken directly from the audit and review plan.

E. Section 3, Summary of Information in the License Renewal Application. This section of the report should include a description of the information contained in the license renewal application that is applicable to the audit and review. This section of the report should be taken directly from the audit and review plan.

F. Section 4, Audit and Review Scope. This section of the report should include statements that:
   (1) The audit and review was performed to fulfill the criteria of 10 CFR 54.21(a)(3).
   (2) The audit and review was performed in accordance with the guidance contained in the SRP-LR and the GALL Report.
   (3) This section also identifies the breadth of the audit performed, stating that the audits and reviews were limited to those AMPs and AMRs assigned to the project team.
      (a) Include in this section a description of the nominal rules used to make the work assignments.
      (b) This section shall note that only seven of the ten AMP elements were audited by the project team and that the other three elements were reviewed by other sections of the NRC staff.

G. Section 5, Audit and Review Process. This section of the report should state that the audit and review was performed in accordance with the processes defined in the audit and review plan and should summarize the audit and review process for AMPs, AMRs, and the UFSAR supplement.

H. Section 6, Exit Meeting.

I. Section 7, Audit and Review Results. This section of the report should include:
   (1) AMPs and AMRs reviewed. The table of contents lists those AMPs reviewed. The audit and review plan documents which AMRs were reviewed by the project team.
   (2) AMPs consistent with the GALL Report. The team's audit and review of each AMP that the applicant identified as consistent with the GALL Report should be documented in the report. Each AMP should have an individual section in the report that includes the following:
      (a) A subsection that identifies the plant AMP name, LRA section number and title, and a statement regarding the consistency of the plant AMP with the GALL Report AMP on which it is based.
      (b) A subsection describing the scope of the plant AMP.
      (c) A subsection describing the plant AMP consistency with respect to the GALL Report AMP, the documents reviewed, and the applicant staff interviewed.
      (d) A subsection listing the exceptions and/or enhancements and associated program elements to the GALL Report AMP, a restatement of the GALL Report AMP program element criteria that apply to the exception or enhancement, and an evaluation that clearly explains why any exceptions (identified by either the applicant or the project team) or enhancements to the plant AMPs are acceptable.
      (e) A review of operating experience used to justify the acceptance of the AMP.

(f) A discussion concerning the adequacy of the applicant's commitment to revise the UFSAR.
(g) A subsection that provides the evaluation and basis for concluding that the plant AMP is consistent with the GALL Report AMP.
(h) If the applicant submitted an amendment or a supplement to its LRA to resolve a question or issue, document the submittal (include the date and the ADAMS accession number), explain the issue that the submittal resolved, and discuss the basis for the resolution.
(i) If an RAI was issued concerning the AMP, identify the RAI number and briefly discuss the RAI. State if the RAI remains open or if the applicant has submitted a response. If the applicant's response to the RAI was acceptable, document the basis for its acceptance.

(3) Plant-specific AMPs. Each plant specific AMP reviewed by the project team should be documented in the audit and review report. This documentation should include:
(a) a subsection identifying the name of the plant AMP, the LRA section number and title, and a description of the scope of the plant AMP.
(b) a subsection that describes the team's review of the seven AMP program elements against the program element criteria in the SRP-LR.
(c) the basis for concluding that each of the seven AMP program elements reviewed by the team is acceptable.
(d) the basis for accepting any exceptions or enhancements to the program element criteria.
(e) If the applicant submitted an amendment or a supplement to its LRA to resolve a question or issue, document the submittal (include the date and the ADAMS accession number), explain the issue that the submittal resolved, and discuss the basis for the resolution.
(f) If an RAI was issued concerning the AMP, identify the RAI number and briefly discuss the RAI. State if the RAI remains open or if the applicant has submitted a response. If the applicant's response to the RAI was acceptable, document the basis for its acceptance.
(g) a discussion of the plant-specific and industry operating experience (one of the seven program elements reviewed by the team), and the review of the operating experience that was used by the team to support its conclusion that the AMP is acceptable.
(h) a discussion concerning the adequacy of any commitments to revise the UFSAR.
(i) the basis for concluding that the plant AMP will adequately manage the effects of aging so that the intended functions will be maintained consistent with the CLB during the period of extended operation.

(4) Aging management reviews. This introductory section should include the following:
(a) A brief summary of what the project team reviewed to perform the audit and review, i.e., the LRA, the SRP-LR, and the applicant's basis documents
(b) A summary review of the AMR notes (A through J) used by the applicant to classify the AMR line items used in the LRA Tables 3.X.2-Y.

(c) The basis for accepting any exceptions to GALL AMRs that were identified by the applicant or the project team reviewer.
(d) If the applicant submitted an amendment or a supplement to its LRA to resolve a question or issue, document the submittal (include the date and the ADAMS accession number), explain the issue that the submittal resolved, and discuss the basis for the resolution.
(e) If an RAI was issued, identify the RAI number and briefly discuss the RAI. State if the RAI remains open or if the applicant has submitted a response. If the applicant's response to the RAI was acceptable, document the basis for its acceptance.
(f) An introductory section for each LRA Section 3.X should be included that contains the LRA section reviewed and a summary of the type of information provided in the section of the LRA reviewed, including a listing of the AMPs reviewed for this LRA section.

(5) AMRs consistent with the GALL Report for which no further evaluation is recommended. This section shall include the following:
(a) The project team will document information on AMRs consistent with the GALL Report for which no further evaluation is required only if it had an audit finding that resulted in an open item requiring a docketed response from the applicant or an RAI.
(b) If the applicant submitted an amendment or a supplement to its LRA to resolve a question or issue, document the submittal (include the date and the ADAMS accession number), explain the issue that the submittal resolved, and discuss the basis for the resolution.
(c) If an RAI was issued, identify the RAI number and briefly discuss the RAI. State if the RAI remains open or if the applicant has submitted a response. If the applicant's response to the RAI was acceptable, document the basis for its acceptance.
(d) Provide a evaluation and finding that verifies that:
(1) the applicant identified the applicable aging effects
(2) the applicant defined the appropriate combination of materials and environments
(3) The applicant specified acceptable AMPs
(e) Provide a conclusion stating, if appropriate, that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, and that 10 CFR 54.21(a)(3) has been satisfied.

(6) AMRs consistent with the GALL Report for which further evaluation is required. This section of the report should include:
(a) A subsection for each of the LRA sections (3.X.2.2.Y) containing the applicant's further evaluations of AMRs for which further evaluation is recommended.
(b) For each LRA Section 3.X.2.2.Y containing the applicant's further evaluations, include the following:
(1) A statement that the project team audited the applicant's further evaluations against the criteria contained in Section 3.X.2.2.Y of the SRP-LR.
(2) The SRP-LR Section 3.X.2.2.Y criteria.

(3) The basis for concluding that the applicant's evaluation of the aging effect satisfies the criteria contained in Section 3.X.2.2.Y of the SRP-LR.
(4) If the applicant submitted an amendment or a supplement to its LRA to resolve a question or issue, document the submittal (include the date and the ADAMS accession number), explain the issue that the submittal resolved, and discuss the basis for the resolution.
(5) If an RAI was issued, identify the RAI number and briefly discuss the RAI. State if the RAI remains open or if the applicant has submitted a response. If the applicant's response to the RAI was acceptable, document the basis for its acceptance.
5) A concluding paragraph summarizing the project team evaluation of the particular aging effect.

(7) AMR results that are not consistent with the GALL Report. This section of the report documents reviews of AMRs that are not consistent with the GALL Report. The audit and review report should include the following:
(a) A summary of the type of information provided in the section of the LRA reviewed. Identify the LRA Tables 3.X.2-Y listed in this section.
(b) For each LRA Table 3.X.2-Y in LRA Section 3.X, the results and findings of NRC-approved precedents that were reviewed.
(c) A evaluation and finding that verifies that:
(1) the applicant identified the applicable aging effects
(2) the applicant listed the appropriate combination of materials and environments
(3) the applicant identified acceptable AMPs
(d) If the applicant submitted an amendment or a supplement to its LRA to resolve a question or issue, document the submittal (include the date and the ADAMS accession number), explain the issue that the submittal resolved, and discuss the basis for the resolution.
(e) If an RAI was issued, identify the RAI number and briefly discuss the RAI. State if the RAI remains open or if the applicant has submitted a response. If the applicant's response to the RAI was acceptable, document the basis for its acceptance.
(f) Provide a conclusion stating, if appropriate, that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, and 10 CFR 54.21(a)(3) has been satisfied.

J. Attachment 1, Acronyms and Initialisms.
K. Attachment 2, Project Team and Applicant Personnel. This attachment should identify the project team members, the key applicant personnel who were consulted during the audit and review, and the individuals that attended the exit meeting.
L. Attachment 3, Elements of an Aging Management Program for License Renewal. This attachment is a standard table of the 10 program elements that are used to evaluate the adequacy of each AMP as presented in Branch Technical Position (BTP) RLSB-1, "Aging Management Review - Generic," in Appendix A of the SRP-LR.

M. Attachment 4, Disposition of Requests for Additional Information, LRA Supplements, and Open Items.
   (1) Include a list of the formal RAIs that were issued as a result of the audit/review and a summary of the disposition of the applicant's response to each RAI.
   (2) Include a list of issues that the applicant agreed to formally address through a supplement or an amendment to its LRA and a summary of the disposition of each issue.
   (3) For each RAI and LRA supplement, identify the applicable AMP or AMR.
   (4) Possible dispositions could include open, closed, or confirmatory item. The genesis of each RAI and LRA supplement, as well as their dispositions should be clearly documented in conjunction with the audit and review results in the applicable AMP or AMR section of the report.

N. Attachment 5, List of Documents Reviewed. This attachment should list all of the documents reviewed by the project team to support its AMP and AMR audits and reviews and to support its evaluations and conclusions.
   (1) indicate which documents were reviewed for each AMP or AMR section.
   (2) include both docketed documents (e.g., the license renewal application) and non-docketed documents (e.g., basis documents, condition reports, and implementing procedures).
   (3) include both licensee-controlled documents (e.g., basis documents, condition reports, and implementing procedures) and other documents (e.g., topical reports and industry codes and standards).

O. Attachment 6, List of Commitments. List and summarize all of the commitments made by the applicant that were reviewed by the project team, including any commitments that the applicant made in response to the team's audit and review. This information will transfer directly into the SER input.