

**From:** D. Ashley  
**To:** Fred.Polaski@exeloncorp.com; John Hufnagel  
**Date:** Wed, Oct 26, 2005 12:37 PM  
**Subject:** Additional information from the AMP/AMR team leader

John, Fred-

I just received this information from Greg Cranston with instruction to provide to you for action.

-Donnie Ashley

Regarding technical bases documentation and further evaluations, the industry wanted to use GALL as a check list for what they needed to address in the AMR. The NRC staff made it clear that an AMR conducted using only the guidance in GALL is not sufficient for a technically complete AMR. The applicant's AMR should start with the systems, structures and components identified in the scoping and screening review as serving an LR intended function. The applicant should document the details of its AMR outside of the LRA. This documentation provides the technical basis for the applicant's dispositions of consistency/nonconsistency with GALL and its disposition of the further evaluations identified in GALL, as documented in the LRA. There needs to be evidence that the applicant did more than use GALL as a check list in their evaluation.

For example, the Brunswick applicant documented its detailed AMR on a system basis. The applicant made available to the audit team, an extensive set of formal calculations that backed up the AMR results in the LRA. Only a handful are listed in the audit report. There were no basis documents that specifically addressed "further evaluations". The LRA only documents the results of the AMR; it is not the AMR.

So the previous request is reworded as follows: "Please ensure that the technical basis documents supporting the AMR results presented in LRA Sections 3.1.2.2 through 3.6.2.2 and in LRA Tables 3.1.2 through 3.6.2 are available for review by the project team during the on-site AMR audit, preferably in both hard-copy and electronic formats."

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**From:** D. Ashley

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