

**From:** Dan Hoang  
**To:** erachp@comcast.net; James Davis; Peter Wen  
**Date:** Thu, Jun 29, 2006 9:47 AM  
**Subject:** Re: QA for aging management of NSR components

In the templet shell for section 3.5 showed:

**"3.5.2.2.3 Quality Assurance for Aging Management of Nonsafety-Related Components**

**PNPS LRA Section 3.5.2.2.3 is reviewed by NRR DE staff and will be addressed separately in Section 3 of the SER related to the PNPS LRA.**

**In PNPS LRA Section 3.5.2.2.3 states that Appendix B, Section B.0.3 contains a discussion of the PNPS quality assurance procedures and administrative controls for the aging management program. "**

By the way, I don't think that we need to enter example # 13 for every note "E" in table 2.

But we DO NEED a justification for EVERY "Not Applicable" under Discussion Column of table 1, where Further Evaluation Recommended column indicated "NONE" , "NO"

Dan

>>> <erachp@comcast.net> 6/29/2006 9:31 AM >>>  
Jim/Peter,

SRP section 3.3.2.2.15 states:

**3.3.2.2.15 Quality Assurance for Aging Management of Nonsafety-Related Components**

Acceptance criteria are described in Branch Technical Position IQMB-1 (Appendix A.2, of this SRP-LR.)

SRP section 3.3.3.2.15 states:

"The applicant's aging management programs for license renewal should contain the elements of corrective actions, the confirmation process, and administrative controls. Safety-related components are covered by 10 CFR Part 50, Appendix B, which is adequate to address these program elements. However, Appendix B does not apply to nonsafety-related components that are subject to an AMR for license renewal. Nevertheless, the applicant has the option to expand the scope of its 10 CFR Part 50, Appendix B program to include these components and address the associated program elements. If the applicant chooses this option, the reviewer verifies that the applicant has documented such a commitment in the FSAR Supplement. If the applicant chooses alternative means, the branch responsible for quality assurance should be requested to review the applicant's proposal on a case-by-case basis."

The same statement appears in each SRP section 3.1, 3.2, 3.3, 3.4, 3.5, 3.6. How do we handle this? There should be one set of standard words that is applied in each of the AMR sections.

The following is what is stated in the Oyster Creek Audit Report shell that we are following:

**3.3.2.2.15 Quality Assurance for Aging Management of Nonsafety-Related Components**

**OCGS LRA Section 3.3.2.2.15 is reviewed by NRR DE staff and will be addressed separately in Section 3 of the SER related to the OCGS LRA.**

The applicant states in LRA Appendix B.0.3:

PNPS quality assurance (QA) procedures, review and approval processes, and administrative controls are implemented in accordance with the requirements of 10 CFR Part 50, Appendix B. The Entergy Quality Assurance Program applies to PNPS safety-related structures and components. Corrective actions and administrative (document) control for both safety-related and nonsafety-related structures and components are accomplished per the existing PNPS corrective action program and document control program.

Please advise.

Erach

**CC:** Bob Jackson; Duc Nguyen; Mark Orr; Wayne Pavinich

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**Subject:** Re: QA for aging management of NSR components  
**Creation Date** Thu, Jun 29, 2006 9:47 AM  
**From:** Dan Hoang

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