

From: <erachp@comcast.net>
To: Mark Orr <MPOrr@atlintl.com>, Joe Zabel <JZabel@atlintl.com>
Date: Fri, May 5, 2006 1:34 PM
Subject: AMR template for not consistent with GALL section

Joe/Mark,

Attached is the NRC concurred template for audit report section 3.X.2.3 - AMRs not consistent with or not addressed in the GALL Report. I used section 3.3 - Auxiliary systems as an example.

Please read the "Note" at the bottom of the template. It applies only to sections 3.2, 3.3, and 3.4 because of the way PNPS chose to format the LRA. Also, note that the first two items; none-none" review, and "Not Applicable" review do not have a subsection number.

Also, I am hoping that when we have our team meeting, the audit report template is ready for the AMP sections. We want to start using it.

Audit team,

This is for your info so you are aware of how this section will be formatted. Note that even though a table may not have any "not consistent" items, there will be paragraph that will make that statement. This will accomplish two things, 1) that the subsection number and the table number will be consistent, and 2) that all table 2's have been reviewed for non-consistent line items.

If you have any questions, please let me know.

Erach

CC: Ram Subbaratnam <rxs2@nrc.gov>, Duc Nguyen <dtn1@nrc.gov>, Wayne Pavinich <wapavinich@comcast.net>, Dan Hoang <DVH@nrc.gov>, Jim Davis <jad@nrc.gov>, Peter Wen <pxw@nrc.gov>, Bob Jackson <JacksonWR@msn.com>, Erach Patel <erachp@comcast.net>

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TWGWPO02.HQGWDO01

RXS2 CC (Ram Subbaratnam)

PXW CC (Peter Wen)

nrc.gov

TWGWPO01.HQGWDO01

DTN1 CC (Duc Nguyen)

nrc.gov

OWGWPO02.HQGWDO01

DVH CC (Dan Hoang)

nrc.gov

OWGWPO01.HQGWDO01

JAD CC (James Davis)

msn.com

JacksonWR CC (Bob Jackson)

comcast.net

wapavinich CC (Wayne Pavinich)

atlintl.com

JZabel (Joe Zabel)

MPOrr (Mark Orr)

Post Office

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TWGWPO01.HQGWDO01

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Files	Size	Date & Time
MESSAGE	1058	Friday, May 5, 2006 1:34 PM
TEXT.htm	1192	
Template_for_not_consistent_with_GALL.wpd	27792	
Mime.822	42417	

Options

Expiration Date:	None
Priority:	Standard
ReplyRequested:	No
Return Notification:	None

Concealed Subject:	No
Security:	Standard

Junk Mail Handling Evaluation Results

Message is eligible for Junk Mail handling
This message was not classified as Junk Mail

Junk Mail settings when this message was delivered

Junk Mail handling disabled by User
Junk Mail handling disabled by Administrator
Junk List is not enabled
Junk Mail using personal address books is not enabled
Block List is not enabled

3.3.2.3 AMR Results That Are Not Consistent With The GALL Report Or Not Addressed In The GALL Report

Summary of Information in the Application

In PNPS LRA Table 3.3.1, Summary of Aging Management Evaluations for the Auxiliary Systems, the applicant provided information regarding components or material/environment combination in the GALL Report that it evaluated and identified as not applicable to its plant.

In PNPS LRA Tables 3.3.2-1 through 3.3.2-14-35, the applicant provided additional details of the results of the AMRs for material, environment, aging effect requiring management, and AMP combinations that are not consistent with the GALL Report. Specifically, the applicant indicated, via Notes F through J, that neither the identified component nor the material/environment combination is evaluated in the GALL Report and provided information concerning how the aging effect requiring management will be managed.

Project Team Evaluation

The project team reviewed additional details of the results of the AMRs for material, environment, aging effect requiring management, and AMP combinations that are not consistent with the GALL Report or are not addressed in the GALL Report.

Aging Effect/Mechanism in Table 3.3.1 That Are Not Applicable for PNPS

[This section is for write-up of the AMR line-items that the applicant claims are not used or not applicable to its plant in LRA Table 1. The write-up does not include the "further evaluation required" in Table 1 since they are evaluated in Section 3.[Y].2. In addition, the evaluation is not necessary if the plant is of a different vintage (PWR vs. BWR)]

The project team reviewed PNPS LRA Table 3.3.1, which provides a summary of aging management evaluations for the auxiliary systems evaluated in the GALL Report.

In PNPS LRA Table 3.1.1, Item [NUMBER] discussion column, the applicant stated that the [list the aging effect] of [list components] due to [list aging mechanism] is not applicable at PNPS.

[The project team evaluation, if applicable]

On the basis that there [is/are] no [list of applicable components] in the auxiliary systems at PNPS, the project team finds that, for this component type, this aging effect is not applicable to PNPS.

[Repeat the above three paragraphs, if applicable, for all items that the applicant claims is not applicable to its plant]

[If there are RAIs or issues that affect all Tables, provide discussion and evaluation here]

[If the LRA lists a series of components which have no aging effect and therefore do not require aging management, the following writeup may be used, as appropriate.]

Auxiliary Systems AMR Line Items That Has No Aging Effect (PNPS LRA Tables 3.3.2-1

through 3.3.2-14-35)

In PNPS LRA Tables 3.3.2-1 through 3.3.2-14-35, the applicant identified line-items where no aging effects were identified as a result of its aging review process.

In PNPS LRA Tables 3.3.2-1 through 3.3.2-14-35, the applicant identified AMR line-items where no aging effects were identified as a result of its aging review process. Specifically, instances in which the applicant states that no aging effects were identified occurred when components fabricated from [list materials] material exposed to [list environments] environment. [Provide evaluation why the LRA claim of no aging effect is valid] in environment for these components and materials. No aging effects are considered to be applicable to components fabricated from [list of material] material exposed to [list of environment] environments.

On the basis of its review of current industry research and operating experience, the project team found that [environments] on [materials] will not result in aging that will be of concern during the period of extended operation. [provide project team evaluation] Therefore, the project team concluded that there are no applicable aging effects requiring management for [materials] components exposed to [list of environment] environments.

On the basis of its audit and review of the applicant's program, the project team found that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained during the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.3.1 Standby Liquid Control system- Summary of Aging Management Evaluation - PNPS LRA Table 3.3.2-1

The project team reviewed the PNPS LRA Table 3.3.2-1, which summarizes the results of AMR evaluations for the [table title] component groups.

In LRA Table 3.3.2-1, the applicant proposed to manage [list aging effect] of [list materials] materials for components types of [list component names] exposed to [list environments] environment using [PNPS] AMP B[NUMBER], "[Applicant AMP Name]."

The project team reviewed [Applicant AMP Name] program and its evaluation is documented in Section [3.0.3.A.A] of this audit and review report. [Briefly provide summary of the program and the project team evaluation]. On the basis of its review of the applicant's plant-specific and industry operating experience, the project team found the aging effect of [list aging effect] of [list materials] material exposed to [list environments] environment are effectively managed using [Applicant AMP Name] program. On this basis, the project team found that management of [list aging effect] in [table title] is acceptable.

3.3.2.3.2 [Table Title] - Summary of Aging Management Evaluation - ([PNPS] LRA Table 3.[Y].2-[S])

- .
- .
- .
- .

3.3.2.3.3 [Table Title] - Summary of Aging Management Evaluation - ([PNPS] LRA Table 3.[Y]2-[S])

3.3.2.3.7 Fuel Oil system - Summary of Aging Management Evaluation - PNPS LRA Table 3.3.2-7

The project team reviewed PNPS LRA Table 3.3.2-7, which summarizes the results of AMR evaluations for the fuel oil system component groups. The results of these evaluations are all consistent with the GALL Report.

3.3.2.3.14.1 See section 3.4

3.3.2.3.14.2 Compressed Air system - Summary of Aging Management Evaluation - PNPS LRA Table 3.3.2-14-2

The project team reviewed PNPS LRA Table 3.3.2-7, which summarizes the results of AMR evaluations for the fuel oil system component groups. The results of these evaluations are all consistent with the GALL Report.

NOTE:

[Some tables that are part of section 3.3, that are a sub-set of Table 3.3-14, belong in sections 3.2 and 3.4. Tables 3.3.2-14-1, 14-3, 14-4, 1-5, 14-9, 14-10, 14-11, 14-17, 14-18, and 14-35 belong in section 3.4, under 3.4.2.3.14.X. Tables 14-7, 14-16, 14-25, and 14-28 belong to section 3.2, under 3.2.2.3.14.X]

Conclusion

On the basis of its review, the project team found that the applicant appropriately evaluated AMR results involving material, environment, aging effects requiring management, and AMP combinations that are not addressed in the GALL Report. The project team found 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, as required by 10 CFR 54.21(a)(3).