

**From:** James Davis  
**To:** erachp@comcast.net  
**Date:** 07/06/2006 8:37:39 AM  
**Subject:** Re: Quality Assurance for aging management of NSR components

Erach,

I intended to add that to what I sent you before. I reworked it and have attached the reworked section 3.0.4.

Jim

>>> <erachp@comcast.net> 07/05/2006 5:32 PM >>>

Jim,

Is that all you want me to put in section 3.0.4. Just two lines?

This is what will also go in the SER. The SRP write-up is pretty clear on what the reviewer should be looking for, specifically, is 10 CFR 50 App.B also used for non-safety related components?

LRA B.0.3, Confirmation Process, and Administrative Controls, the applicant states that "the Entergy QA program applies to safety-related structures and components." They do not make a similar statement in Corrective Actions.

Please confirm and I will incorporate the two lines in the new section 3.0.4. Do you have any references that you reviewed?

Erach

----- Original message -----

From: "James Davis" <JAD@nrc.gov>

> Erach,

>

> Attached is the writeup for the corrective action plan.

>

> Jim

>

> >>> 07/05/2006 1:21 PM >>>

> Hi,

> In each of the AMR sections in the SRP, under AMR results for which further  
> evaluation is recommended, we need to address how the applicant has applied  
> their Corrective Action program to non-safety related components. This is  
> intended to address elements 7-9 in the AMPs.

> These sections in the SRP are:

> 3.1.2.2.18, 3.2.2.2.10, 3.3.2.2.15, 3.4.2.2.10, 3.5.2.2.3, and 3.6.2.2.4.

>

> Jim Davis and I discussed this today, and here is how we will address it.

>

> In the Audit and review report, in the above listed sections, please make the  
> following statement:

>

> 3.1.2.2.15 (etc.) Quality Assurance for Aging Management of Non-  
> Safety Related Components

>

> The applicant referenced LRA Section B.0.3. The project team's evaluation of  
> Section B.0.3 is provided in Section 3.0.4 of this audit and review report.

>

> I will create a new Section 3.0.4 in the AMP part of the audit and review  
> report. Jim Davis reviewed the PNPS Corrective Action program and will provide

- > me the appropriate words to include in this section.
- >
- > If you have any questions, please call me or e-mail me.
- >
- > erach
- >
- >

**Mail Envelope Properties** (44AD0413.86E : 22 : 35346)

**Subject:** Re: Quality Assurance for aging management of NSR components  
**Creation Date** 07/06/2006 8:37:39 AM  
**From:** James Davis

**Created By:** JAD@nrc.gov

<b>Recipients</b>	<b>Action</b>	<b>Date &amp; Time</b>
comcast.net AM erachp (erachp@comcast.net)	Transferred	07/06/2006 8:38:11

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MESSAGE	3819	07/06/2006 8:37:39 AM
Element 7, 8, and 9.wpd	15624	07/06/2006 8:36:02 AM

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### 3.0.4 Quality Assurance Program Attributes Integral to Aging Management Programs

Pursuant to 10 CFR 54.21(a)(3), a license renewal applicant is required to demonstrate that the effects of aging on SCs subject to an AMR will be adequately managed so that their intended functions will be maintained consistent with the CLB for the period of extended operation. SRP-LR, Branch Technical Position RLSB-1, "Aging Management Review - Generic," describes ten attributes of an acceptable AMP. Three of these ten attributes are associated with the quality assurance activities of corrective action, confirmation processes, and administrative controls. Table A.1-1, "Elements of an Aging Management Program for License Renewal," of Branch Technical Position RLSB-1 provides the following description of these quality attributes:

- Corrective actions, including root cause determination and prevention of recurrence, should be timely.
- The confirmation process should ensure that preventive actions are adequate and that appropriate corrective actions have been completed and are effective.
- Administrative controls should provide a formal review and approval process.

SRP-LR, Branch Technical Position IQMB-1, "Quality Assurance For Aging Management Programs," noted that those aspects of the AMP that affect quality of SR SCs are subject to the quality assurance (QA) requirements of 10 CFR Part 50, Appendix B. Additionally, for NSR SCs subject to an AMR, the existing 10 CFR Part 50, Appendix B, QA program may be used by the applicant to address the elements of corrective action, the confirmation process, and administrative controls. Branch Technical Position IQMB-1 provides the following guidance with regard to the QA attributes of AMPs:

SR structures and components are subject to 10 CFR Part 50, Appendix B, requirements, which are adequate to address all quality-related aspects of an AMP consistent with the CLB of the facility for the period of extended operation.

For NSR SCs that are subject to an AMR for license renewal, an applicant has an option to expand the scope of its 10 CFR Part 50 Appendix B program to include these structures and components to address corrective actions, the confirmation process, and administrative controls for aging management during the period of extended operation. In this case, the applicant should document such a commitment in the FSAR supplement in accordance with 10 CFR 54.21(d). PNPS has chosen to follow the current procedure for handling NSR SCs subject to an AMR. They use the same procedures for corrective actions, the confirmation process, and administrative controls for SR and NSR SCs but do not include NSR SCs in their Appendix B program.

The project staff reviewed the applicant's corrective action, confirmation process, and administrative controls procedure and found them to be acceptable. The corrective action procedure is reviewed on a routine basis by the regional inspection teams and has been found to be acceptable during past inspections.