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Date: Thu, Mar 30, 2006 4:46 PM
Subject: PNPS Audit Plan

Mark and Joe:

As we discussed yesterday (3/29), attached are the WP files to be used in the audit plan.

Peter

CC: James Davis

Mail Envelope Properties (442C51B5.806 : 20 : 35420)

Subject: PNPS Audit Plan
Creation Date: Thu, Mar 30, 2006 4:46 PM
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MESSAGE	578	Thursday, March 30, 2006 4:46 PM
PNPS Audit Plan TLAA Section 4.wpd		14955 Thursday, March 23,
2006 10:06 AM		
PNPS Audit Plan TLAA Section 5.wpd		6308 Wednesday, March
29, 2006 2:14 PM		
PNPS Audit Plan TLAA Section 6.wpd		131322 Tuesday, March 28,
2006 11:16 AM		
PNPS Audit Plan Figure 5.wpd	88342	Thursday, March 30, 2006 4:41 PM
PNPS Audit Plan TLAA Assignments.wpd		9872 Thursday, March 30,
2006 4:39 PM		

Options

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

Concealed Subject: No
Security: Standard

4.2 Time-Limited Aging Analyses

The PNPS LRA closely follows the standard LRA format presented in Revision 6 of NEI 95-10, "Industry Guidelines for Implementing the Requirements of 10 CFR Part 54 - The License Renewal Rule." Section 4 of the PNPS LRA addresses time-limited aging analyses. In Section 4.1.1, the PNPS LRA states that the calculations and evaluations that could potentially meet the six criteria of 10 CFR 54.3 were identified by searching CLB documents including the following:

- Technical Specifications
- UFSAR
- docketed licensing correspondence
- fire protection program documents
- NRC safety evaluation reports
- BWRVIP documents

In Section 4.1, the PNPS LRA states that as required by 10 CFR 54.21(c)(1), an evaluation of PNPS-specific time-limited aging analyses must be performed to demonstrate that:

- (i) The analyses remain valid for the period of extended operation;
- (ii) The analyses have been projected to the end of the period of extended operation; or
- (iii) The effects of aging on the intended functions(s) will be adequately managed for the period of extended operation.

In the PNPS LRA, the applicant summarized the results of the above evaluations in Table 4.1-1. These evaluations are discussed in subsequent sections of PNPS LRA Section 4.

Following the section identifying the TLAA's, the PNPS LRA next includes a section identifying any exemptions. Section 10 CFR 54.21(c) also requires that the application for a renewed license includes a list of plant-specific exemptions granted pursuant to 10 CFR 50.12 and in effect that are based on time-limited aging analyses as defined in 10 CFR 54.3. The PNPS performed this by reviewing PNPS docketed correspondence which identified PNPS exemptions. The results of this review determined that no PNPS exemptions depend on TLAA's.

The PNPS LRA next includes a separate section for each of the identified TLAA's within the outline of the corresponding NUREG-1800 TLAA category. The TLAA categories are outlined in the next table.

TLAA Description	Resolution Option	Section
Reactor Vessel Neutron Embrittlement Analyses		4.2
Pressure-temperature limits	Analyses remain valid 10 CFR 54.21(c)(1)(i)	4.2.2
Charpy upper-shelf energy	Analyses projected 10 CFR 54.21(c)(1)(ii)	4.2.3
Adjusted reference temperature	Analyses projected 10 CFR 54.21(c)(1)(ii)	4.2.4

Reactor vessel circumferential welds inspection relief	Analysis projected 10 CFR 54.21(c)(1)(ii)	4.2.5
Reactor vessel axial welds failure probability	Analysis projected 10 CFR 54.21(c)(1)(ii)	4.2.6
Metal Fatigue Analyses		4.3
Class 1 fatigue	Analyses remain valid 10 CFR 54.21(c)(1)(i) OR Aging effect managed 10 CFR 54.21(c)(1)(iii)	4.3.1
Non-Class 1 fatigue	Analyses remain valid 10 CFR 54.21(c)(1)(i)	4.3.2
Effects of reactor water environment on fatigue life	Analyses remain valid 10 CFR 54.21(c)(1)(i) OR Analyses projected 10 CFR 54.21(c)(1)(ii) OR Aging effect managed 10 CFR 54.21(c)(1)(iii)	4.3.3
Environmental Qualification Analyses for Electrical Equipment	Aging effect managed 10 CFR 54.21(c)(1)(iii)	4.4
Containment Liner Plate, Metal Containment, and Penetrations Fatigue Analyses		4.6
Fatigue of primary containment	Analysis projected 10 CFR 54.21(c)(1)(ii)	4.6.1
Other TLA		4.7
Reflood thermal shock of the reactor vessel internals	Analysis remains valid 10 CFR 54.21(c)(1)(i)	4.7.1
TLAA in BWRVIPs		4.7.2
BWRVIP-05, RPV circumferential welds analysis	Addressed in Sections 4.2.5	4.7.2.1
BWRVIP-48, vessel ID attachment welds fatigue analysis	Analysis remains valid 10 CFR 54.21(c)(1)(ii)	4.7.2.2
BWRVIP-49, instrument penetrations fatigue analysis	Analysis projected 10 CFR 54.21(c)(1)(ii)	4.7.2.3
BWRVIP-74, reactor vessel P/T curves analysis Fatigue analysis C _v USE analysis Circ/Axial welds analysis	Addressed in Section 4.2.2 Addressed in Section 4.3.1 Addressed in Section 4.2.3 Addressed in Sections 4.2.5 and 4.2.6	4.7.2.4
BWRVIP-76, core shroud fatigue analysis	Analysis remains valid 10 CFR 54.21(c)(1)(ii)	4.7.2.5

5.3 Time-Limited Aging Analyses

The TLAAs in the PNPS LRA fall into the broad category of those that are consistent with the NUREG-1800 TLAA categories. There are no plant-specific exemptions identified in the VYNPS LRA that depend on time-limited aging analyses.

For its TLAA reviews, the project team will determine if the applicant had provided adequate information to meet the requirements of 10 CFR 54.21(c)(1) and 10 CFR 54.21(c)(2).

Further, the project team will conduct both regulatory evaluations and technical evaluations to determine, as defined in 10 CFR 54.3, that each TLAA meets the following six criteria:

- (1) involve systems, structures, and components that are within the scope of license renewal, as delineated in 10 CFR 54.4(a).
- (2) consider the effects of aging.
- (3) involve time-limited assumptions defined by the current operating term (40 years).
- (4) are determined to be relevant by the applicant in making a safety determination.
- (5) involve conclusions, or provide the basis for conclusions, related to the capability of the system, structure, and component to perform its intended functions, as delineated in 10 CFR 54.4(b).
- (6) are contained or incorporated by reference in the CLB.

In addition, the project team will also review the TLAAs to determine if there are emerging issues that should be further evaluated by technical specialists in the NRC Divisions of Component Integrity (DCI) or the Division of Engineering (DE). This is not expected to be an issue for TLAAs for which the applicant claims consistency with 10 CFR 54.21(c)(i) "the analyses remain valid for the period of extended operation." or 10 CFR 54.21(c)(iii) "the effects of aging on the intended function(s) will be adequately managed for the period of extended operation."

For TLAAs for which the applicant claims consistency with 10 CFR 54.21(c)(ii) - "the analyses have been projected to the end of the period of extended operation," the audit team leader will be consulted to determine which TLAAs the audit team will be capable of reviewing. Consideration should be given to project team expertise, past precedent, and complexity of the provided analysis. Candidates for further review by technical specialists could be such as the following:

Reactor Vessel Neutron Embrittlement Analysis
Intergranular separation in the Heat-Affected Zone (HAZ) of Reactor Vessel
Containment Liner Plate, Metal Containment, and Penetrations Fatigue Analyses
Low-Alloy Steel under Austenitic SS Cladding

6.4 Time-Limited Aging Analyses (TLAA) Audits and Reviews

Audit and review of TLAA are discussed below. The project team will also review the TLAA to determine if there are emerging issues that should be further evaluated by technical specialists in the NRC Divisions of Component Integrity (DCI) or the Division of Engineering (DE). In general, the project team will review TLAA that are for which the applicant claims consistency with 10 CFR 54.21(c)(i) "the analyses remain valid for the period of extended operation." or 10 CFR 54.21(c)(iii) "the effects of aging on the intended function(s) will be adequately managed for the period of extended operation." For TLAA for which the applicant claims consistency with 10 CFR 54.21(c)(ii) - "the analyses have been projected to the end of the period of extended operation," the audit team leader will be consulted to determine which TLAA the audit team will be capable of reviewing. Consideration should be given to team expertise, past precedent, and complexity of the provided analysis.

6.4.1 Identify Generic TLAA Issues

Figure 5, "Evaluation of TLAA and Exemptions," taken from NEI 95-10, Revision 6, shows the process of evaluating and reviewing TLAA and also identifying the exemptions in effect. This process flowchart shows the activities and decisions used to audit/review each TLAA that the applicant identifies.

Pre-Review Preparation

- A. For the PNPS TLAA that the applicant has identified as generic TLAA issues, identify the corresponding TLAA in NUREG-1800, if appropriate.
- B. Review the corresponding TLAA in NUREG-1800 and identify those that will be audited/reviewed in conjunction with each of the PNPS TLAA.
- C. Review the list of the PNPS plant-specific exemptions granted pursuant to §50.12 and in effect that are based on TLAA as defined in §54.3. The application shall include an evaluation that justifies the continuation of these exemptions for the period of extended operation.
- D. Identify and locate the documents needed to perform the review. These may include, but are not limited to, the following:
 - Excel database on TLAA summarizing how earlier LRAs and SERs presented and reviewed
 - TLAA
 - GALL Report
 - SRP-LR
 - ISG-LR
 - RAIs, audit and review reports, and SERs for similar plants
 - LRA
 - References listed by applicant for each TLAA
 - NEI 95-10, Section 5.1 and Table 6.2-2
 - basis documents
 - implementation documents
 - operating experience reports (plant-specific and industry)

- lessons learned developed by RLRC
 - applicant's UFSAR
- E. In addition, the project team will also review the TLAA's to determine if there are emerging issues that should be further evaluated by technical specialists in the NRC Divisions of Component Integrity (DCI) or the Division of Engineering (DE). This is not expected to be an issue for TLAA's for which the applicant claims consistency with 10 CFR 54.21(c)(i) "the analyses remain valid for the period of extended operation." or 10 CFR 54.21(c)(iii) "the effects of aging on the intended function(s) will be adequately managed for the period of extended operation." For TLAA's for which the applicant claims consistency with 10 CFR 54.21(c)(ii) - "the analyses have been projected to the end of the period of extended operation," the audit team leader will be consulted to determine which TLAA's the audit team will be capable of reviewing. Consideration should be given to team expertise, past precedent, and complexity of the provided analysis. Candidates for further review by technical specialists could be such as the following:
- Reactor Vessel Neutron Embrittlement Analysis (PNPS LRA Section 4.2)
 - Containment Liner Plate, Metal Containment, and Penetrations Fatigue Analyses (PNPS LRA Section 4.6)
 - Reflood Thermal Shock Analyses of the Reactor Vessel Internals (PNPS LRA Section 4.7.1)

Audit/Review

- A. Confirm that each PNPS TLAA listed in this section is appropriate. Refer to any analyses and evaluations created during the acceptance review process.
- B. If a TLAA is listed in the SRP-LR or NEI 95-10 and not in its LRA, the PNPS should state in this section that it does not apply.
- C. Review any industry and plant-specific operating experience associated with the TLAA. This is an area of review emphasis. The project team members should consider the following industry guidance (from NEI 95-10, Table 6.2-2) as follows:
- The application shall include a list of time-limited aging analyses, as defined by §54.3. The application should include the identification of the affected systems, structures, and components, an explanation of the time dependent aspects of the calculation or analysis, and a discussion of the TLAA's impact on the associated aging effect. The identification of the results of the time-limited aging analysis review, which may be provided in tabular form, may reference the section in the Integrated Plant Assessment-Aging Management Review chapter where more details of the actual review and disposition (as required by §54.21(c)(1)(i)-(iii)) are located.
 - The application shall include a demonstration that (1) the analyses remain valid for the period of extended operation, (2) the analyses have been (or have been identified and will be [§54.29(a)]) projected to the end of the period of extended operation or (3) the effects of aging on the

intended function(s) will be adequately managed for the period of extended operation.

- The application shall include a list of plant-specific exemptions granted pursuant to §50.12 and in effect that are based on TLAAAs as defined in §54.3. The application shall include an evaluation that justifies the continuation of these exemptions for the period of extended operation.
 - Summary descriptions of the evaluations of TLAAAs for the period of extended operation shall be included in the UFSAR supplement (Appendix A).
- D. If it is necessary to ask the applicant a question to clarify the basis for their analyses, follow the logic process shown in Figure 5 of this audit and review plan.
- E. If it is necessary for the applicant to submit additional information to support the basis for the conclusions in their TLAA, the applicant may agree to voluntarily submit the required information as a supplement (docketed letter submitted under oath and affirmation) to the PNPS LRA. If not, the NRC may issue an RAI to obtain the information.

TLAA Audit Worksheets

Document the audits/reviews using the worksheet provided in Appendix I, "TLAA Audit/Review Worksheet."

6.4.2 Metal Fatigue Analyses

Figure 5, "Evaluation of TLAAAs and Exemptions," taken from NEI 95-10, Revision 6, shows the process of evaluating and reviewing TLAAAs and also identifying the exemptions in effect. This process flowchart shows the activities and decisions used to audit/review each TLAA that the applicant identifies.

Pre-Review Preparation

- A. The project team will determine if the TLAAAs identified in the PNPS LRA to be within the NUREG-1800 TLAA category of "metal fatigue" have provided adequate information to meet the requirements of 10 CFR 54.21(c)(1) and 10 CFR 54.21(c)(2).
- B. Identify and locate the documents needed to perform the review. These may include, but are not limited to, the following:
- Excel database on TLAAAs summarizing how earlier LRAs and SERs presented and reviewed TLAAAs
 - GALL Report, especially Section X.M1
 - SRP-LR
 - ISG-LR
 - RAIs, audit and review reports, and SERs for similar plants
 - LRA
 - References listed by applicant for each TLAA
 - NEI 95-10, Section 5.1 and Table 6.2-2

- basis documents
 - implementation documents
 - operating experience reports (plant-specific and industry)
 - lessons learned developed by RLRC
 - applicant's UFSAR
- C. In addition, the project team will also review the PNPS TLAA within the NUREG-1800 TLAA category of "metal fatigue" to determine if there are emerging issues that should be further evaluated by technical specialists in the NRC Divisions of Component Integrity (DCI) or the Division of Engineering (DE). This is not expected to be an issue for TLAA's for which the applicant claims consistency with 10 CFR 54.21(c)(i) "the analyses remain valid for the period of extended operation." or 10 CFR 54.21(c)(iii) "the effects of aging on the intended function(s) will be adequately managed for the period of extended operation." For TLAA's for which the applicant claims consistency with 10 CFR 54.21(c)(ii) - "the analyses have been projected to the end of the period of extended operation," the audit team leader will be consulted to determine which TLAA's the audit team will be capable of reviewing. Consideration should be given to team expertise, past precedent, and complexity of the provided analysis.

Audit/Review

- A. Confirm that each PNPS TLAA listed in this section is appropriate. Refer to any analyses and evaluations created during the acceptance review process.
- B. If a TLAA is listed in the SRP-LR or NEI 95-10 and not in its LRA, the PNPS should state in this section that it does not apply.
- C. The project team will conduct both regulatory evaluations and technical evaluations to determine, as defined in 10 CFR 54.3, that each TLAA meets the following six criteria:
- (1) involve systems, structures, and components that are within the scope of license renewal, as delineated in 10 CFR 54.4(a)
 - (2) consider the effects of aging
 - (3) involve time-limited assumptions defined by the current operating term (40 years)
 - (4) are determined to be relevant by the applicant in making a safety determination
 - (5) involve conclusions, or provide the basis for conclusions, related to the capability of the system, structure, and component to perform its intended functions, as delineated in 10 CFR 54.4(b)
 - (6) are contained or incorporated by reference in the CLB
- D. The project team will ascertain that the PNPS satisfactorily demonstrates that (1) the analyses remain valid for the period of extended operation, (2) the analyses have been (or have been identified and will be [§54.29(a)]) projected to the end of the period of extended operation or (3) the effects of aging on the intended function(s) will be adequately managed for the period of extended operation.
- E. Review any industry and plant-specific operating experience associated with the

TLAA. This is an area of review emphasis. The project team members should consider the following industry guidance on metal fatigue (from NEI 95-10, Table 6.2-2) as follows:

- Disposition chosen for each of the identified TLAA's. Also, provide a reference to the summary description of TLAA evaluations in the FSAR supplement (Appendix A). Use hypertext to link to the appropriate location in the appendix for electronic submittals [§54.21(c)(1) and §54.21(d)1.
- F. If it is necessary to ask the applicant a question to clarify the basis for their analyses, follow the logic process shown in Figure 5 of this audit and review plan.
- G. If it is necessary for the applicant to submit additional information to support the basis for the conclusions in their TLAA, the applicant may agree to voluntarily submit the required information as a supplement (docketed letter submitted under oath and affirmation) to the PNPS LRA. If not, the NRC may issue an RAI to obtain the information.

TLAA Audit Worksheets

Document the audits/reviews using the worksheet provided in Appendix I, "TLAA Audit/Review Worksheet."

6.4.3 Environmental Qualification Analyses for Electrical Components

Figure 5, "Evaluation of TLAA's and Exemptions," taken from NEI 95-10, Revision 6, shows the process of evaluating and reviewing TLAA's and also identifying the exemptions in effect. This process flowchart shows the activities and decisions used to audit/review each TLAA that the applicant identifies.

Pre-Review Preparation

- A. The project team will determine if the TLAA's identified in the PNPS LRA to be within the NUREG-1800 TLAA category of "environmental qualification of electric equipment" have provided adequate information to meet the requirements of 10 CFR 54.21(c)(1) and 10 CFR 54.21(c)(2).
- B. *Identify and locate the documents needed to perform the review. These may include, but are not limited to, the following:*
- Excel database on TLAA's summarizing how earlier LRAs and SERs presented and reviewed TLAA's
 - GALL Report, especially Section X.E1
 - SRP-LR
 - ISG-LR
 - RAIs, audit and review reports, and SERs for similar plants
 - LRA
 - References listed by applicant for each TLAA
 - NEI 95-10, Section 5.1 and Table 6.2-2
 - basis documents

- implementation documents
 - operating experience reports (plant-specific and industry)
 - lessons learned developed by RLRC
 - applicant's UFSAR
- C. In addition, the project team will also review the PNPS TLAA within the NUREG-1800 TLAA category of "environmental qualification of electric equipment" to determine if there are emerging issues that should be further evaluated by technical specialists in the NRC Divisions of Component Integrity (DCI) or the Division of Engineering (DE). This is not expected to be an issue for TLAA's for which the applicant claims consistency with 10 CFR 54.21(c)(i) "the analyses remain valid for the period of extended operation." or 10 CFR 54.21(c)(iii) "the effects of aging on the intended function(s) will be adequately managed for the period of extended operation." For TLAA's for which the applicant claims consistency with 10 CFR 54.21(c)(ii) - "the analyses have been projected to the end of the period of extended operation," the audit team leader will be consulted to determine which TLAA's the audit team will be capable of reviewing. Consideration should be given to team expertise, past precedent, and complexity of the provided analysis.

Audit/Review

- A. Confirm that each PNPS TLAA listed in this section is appropriate. Refer to any analyses and evaluations created during the acceptance review process.
- B. If a TLAA is listed in the SRP-LR or NEI 95-10 and not in its LRA, the PNPS should state in this section that it does not apply.
- C. The project team will conduct both regulatory evaluations and technical evaluations to determine, as defined in 10 CFR 54.3, that each TLAA meets the following six criteria:
- (1) involve systems, structures, and components that are within the scope of license renewal, as delineated in 10 CFR 54.4(a)
 - (2) consider the effects of aging
 - (3) involve time-limited assumptions defined by the current operating term (40 years)
 - (4) are determined to be relevant by the applicant in making a safety determination
 - (5) involve conclusions, or provide the basis for conclusions, related to the capability of the system, structure, and component to perform its intended functions, as delineated in 10 CFR 54.4(b)
 - (6) are contained or incorporated by reference in the CLB
- D. The project team will ascertain that the PNPS satisfactorily demonstrates that (1) the analyses remain valid for the period of extended operation, (2) the analyses have been (or have been identified and will be [§54.29(a)]) projected to the end of the period of extended operation or (3) the effects of aging on the intended function(s) will be adequately managed for the period of extended operation.
- E. Review any industry and plant-specific operating experience associated with the

TLAA. This is an area of review emphasis. The project team members should consider the following industry guidance on environmental qualification of electric equipment (from NEI 95-10, Table 6.2-2) as follows:

- Disposition chosen for each of the identified TLAA's. Also, provide a reference to the summary description of TLAA evaluations in the FSAR supplement (Appendix A). Use hypertext to link to the appropriate location in the appendix for electronic submittals [§54.21(c)(1) and §54.21(d)1.
- F. If it is necessary to ask the applicant a question to clarify the basis for their analyses, follow the logic process shown in Figure 5 of this audit and review plan.
- G. If it is necessary for the applicant to submit additional information to support the basis for the conclusions in their TLAA, the applicant may agree to voluntarily submit the required information as a supplement (docketed letter submitted under oath and affirmation) to the PNPS LRA. If not, the NRC may issue an RAI to obtain the information.

TLAA Audit Worksheets

Document the audits/reviews using the worksheet provided in Appendix I, "TLAA Audit/Review Worksheet."

6.4.4 Other Plant-Specific TLAA's

Figure 5, "Evaluation of TLAA's and Exemptions," taken from NEI 95-10, Revision 6, shows the process of evaluating and reviewing TLAA's and also identifying the exemptions in effect. This process flowchart shows the activities and decisions used to audit/review each TLAA that the applicant identifies.

Pre-Review Preparation

- A. The project team will determine if the TLAA's identified in the PNPS LRA to be within the NUREG-1800 TLAA category of "other plant-specific TLAA's" have provided adequate information to meet the requirements of 10 CFR 54.21(c)(1) and 10 CFR 54.21(c)(2).
- B. Identify and locate the documents needed to perform the review. These may include, but are not limited to, the following:
- Excel database on TLAA's summarizing how earlier LRAs and SERs presented and reviewed TLAA's
 - GALL Report
 - SRP-LR
 - ISG-LR
 - RAIs, audit and review reports, and SERs for similar plants
 - LRA
 - References listed by applicant for each TLAA
 - NEI 95-10, Section 5.1 and Table 6.2-2
 - basis documents

- implementation documents
 - operating experience reports (plant-specific and industry)
 - lessons learned developed by RLRC
 - applicant's UFSAR
- C. In addition, the project team will also review the PNPS TLAA's within the NUREG-1800 TLAA category of "other plant-specific TLAA's" to determine if there are emerging issues that should be further evaluated by technical specialists in the NRC Divisions of Component Integrity (DCI) or the Division of Engineering (DE). This is not expected to be an issue for TLAA's for which the applicant claims consistency with 10 CFR 54.21(c)(i) "the analyses remain valid for the period of extended operation." or 10 CFR 54.21(c)(iii) "the effects of aging on the intended function(s) will be adequately managed for the period of extended operation." For TLAA's for which the applicant claims consistency with 10 CFR 54.21(c)(ii) - "the analyses have been projected to the end of the period of extended operation," the audit team leader will be consulted to determine which TLAA's the audit team will be capable of reviewing. Consideration should be given to team expertise, past precedent, and complexity of the provided analysis.

Audit/Review

- A. Confirm that each PNPS TLAA listed in this section is appropriate. Refer to any analyses and evaluations created during the acceptance review process.
- B. If a TLAA is listed in the SRP-LR or NEI 95-10 and not in its LRA, the PNPS should state in this section that it does not apply.
- C. The project team will conduct both regulatory evaluations and technical evaluations to determine, as defined in 10 CFR 54.3, that each TLAA meets the following six criteria:
- (1) involve systems, structures, and components that are within the scope of license renewal, as delineated in 10 CFR 54.4(a)
 - (2) consider the effects of aging
 - (3) involve time-limited assumptions defined by the current operating term (40 years)
 - (4) are determined to be relevant by the applicant in making a safety determination
 - (5) involve conclusions, or provide the basis for conclusions, related to the capability of the system, structure, and component to perform its intended functions, as delineated in 10 CFR 54.4(b)
 - (6) are contained or incorporated by reference in the CLB
- D. The project team will ascertain that the PNPS satisfactorily demonstrates that (1) the analyses remain valid for the period of extended operation, (2) the analyses have been (or have been identified and will be [§54.29(a)]) projected to the end of the period of extended operation or (3) the effects of aging on the intended function(s) will be adequately managed for the period of extended operation.
- E. Review any industry and plant-specific operating experience associated with the TLAA. This is an area of review emphasis. The project team members should

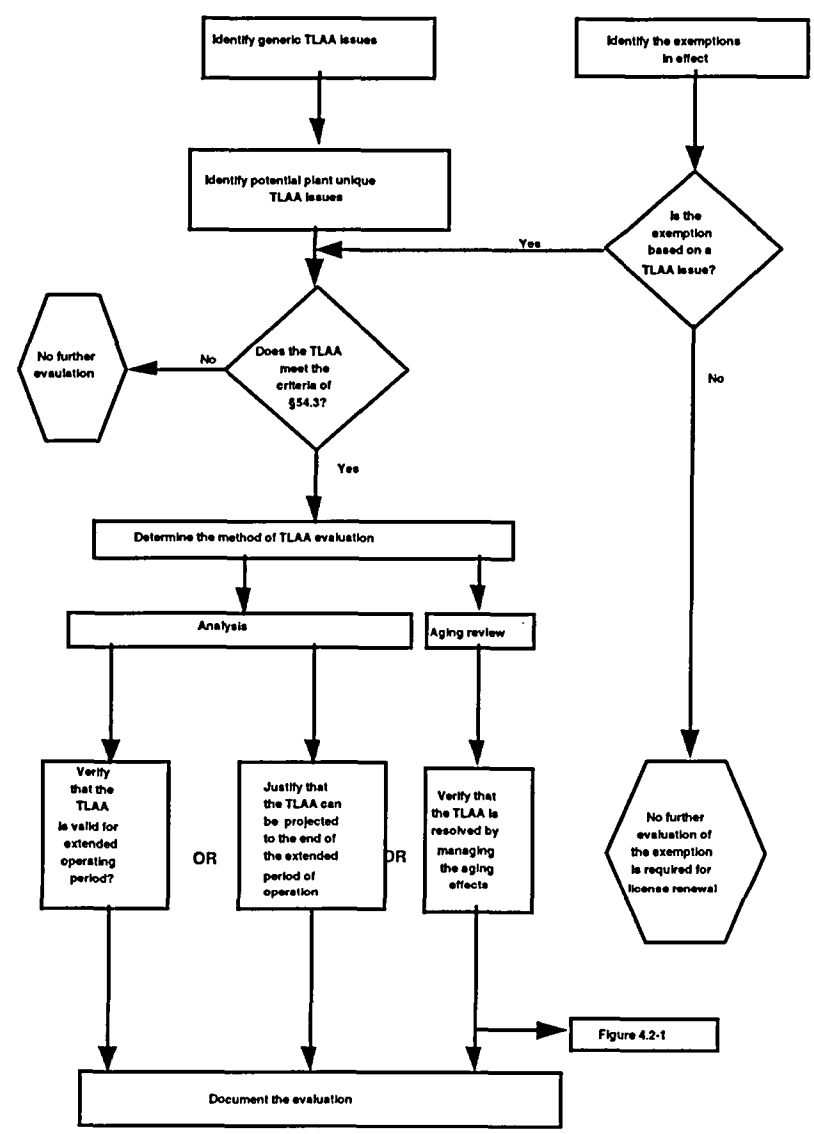
consider the following industry guidance on "other plant-specific TLAAs" (from NEI 95-10, Table 6.2-2) as follows:

- Identify and evaluate any plant-specific TLAAs.
- F. If it is necessary to ask the applicant a question to clarify the basis for their analyses, follow the logic process shown in Figure 5 of this audit and review plan.
- G. If it is necessary for the applicant to submit additional information to support the basis for the conclusions in their TLAA, the applicant may agree to voluntarily submit the required information as a supplement (docketed letter submitted under oath and affirmation) to the PNPS LRA. If not, the NRC may issue an RAI to obtain the information.

TLAA Audit Worksheets

Document the audits/reviews using the worksheet provided in Appendix I, "TLAA Audit/Review Worksheet."

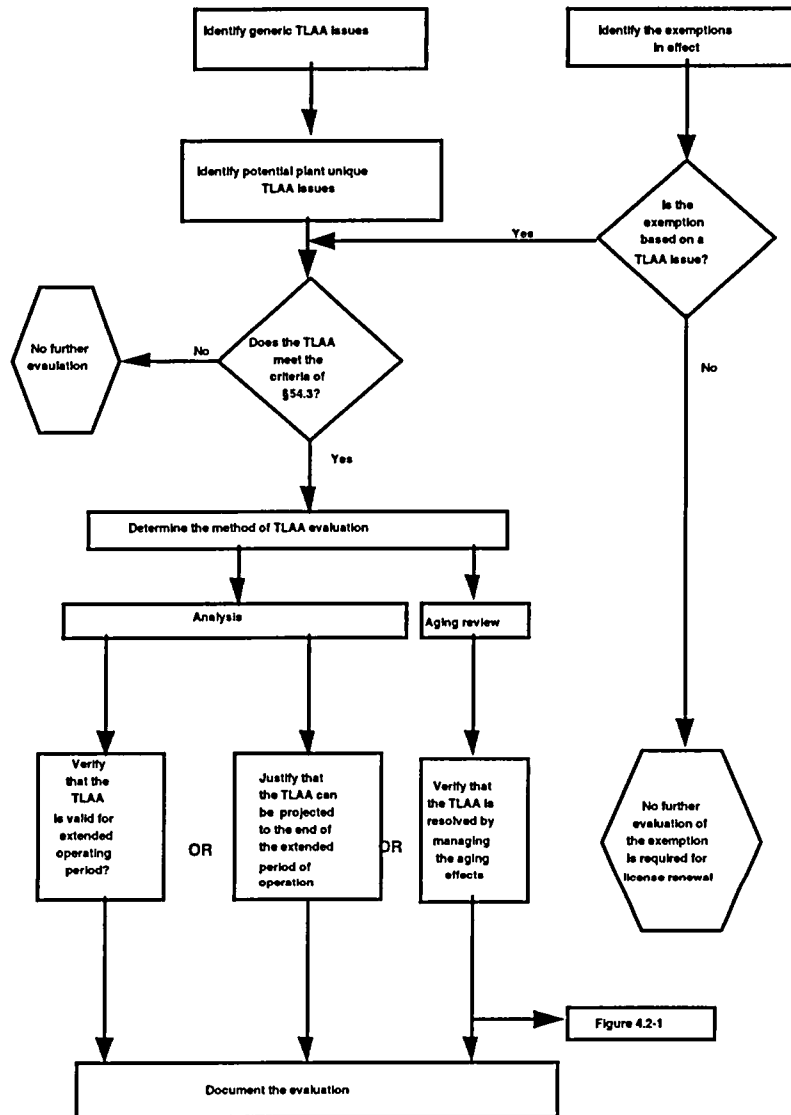
Figure 5. Review of TLAA's and Exemptions (from NEI 95-10, Revision 6)



Appendix I (Later)

Time-Limited Aging Analyses (TLAA) Audit/Review Worksheet

Figure 5. Review of TLAA's and Exemptions (from NEI 95-10, Revision 6)



Appendix E

Time-Limited Aging Analyses Review Assignments

LRA TLAA Number	GALL Report TLAA Number	TLAA Title	10 CFR 54.21(c)(1) category		Assigned Reviewer
			(i) or (iii)	(ii)	
4.1	---	Identification of TLAAs and Exemptions			Davis
4.2	---	Reactor Vessel Neutron Embrittlement	(i)	(ii)	DCI
4.3	X.M1	Metal Fatigue	(i) or (iii)	(ii)	Patel
4.4	X.E1	Environmental Qualification of Electrical Components	(iii)		Nguyen
4.5	X.S1	Concrete Containment Tendon Prestress	Not applicable to PNPS		N/A
4.6	---	Containment Liner Plate, Metal Containment, and Penetrations Fatigue Analyses		(ii)	DE
4.7.2	---	TLAA in BWRVIPs	(i)	(ii)	Davis