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**To:** Jim Davis <jad@nrc.gov>  
**Date:** 07/31/2006 2:49:07 PM  
**Subject:** Urgent - revised section 3.0.4 input for QA program

Jim,

I have revised your section 3.0.4 write-up as per attached. This will make the write-up consistent with how the SER is written. For the SER, Ram can just copy this straight in. All he will have to do is change project team to staff.

Please give this a quick review and if you are satisfied, I will send this to Mark Orr as part of my comment worksheet for input to my AMPs.

I also recommend strongly that we do not address elements 7, 8, and 9 in the audit report section 3.0.3.3, "PNPS AMPs that are not Consistent with the GALL Report or not Addressed in the GALL Report." This section is about plant specific programs and the only section where these elements are addressed. I reviewed the Millstone, Brunswick and Browns Ferry SERs and these elements are not addressed. We can indicate generically in our write-up that these elements are addressed in section 3.0.4.

Erach

**CC:** Mark Orr <MPorr@atlintl.com>, Ram Subbaratnam <rxs2@nrc.gov>, Peter Wen <pxw@nrc.gov>

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TEXT.htm	1083	
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Mime.822	35725	

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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).

#### 3.0.4.1 Summary of Technical Information in Application

LRA Section 3.0, "Aging Management Review Results," provides an AMR summary for each unique structure, component, or commodity group determined to require aging management during the period of extended operation. This summary includes identification of AERMs and AMPs utilized to manage these aging effects. LRA Appendix A, "Updated Final Safety Analysis Report Supplement," and LRA Appendix B, "Aging Management Programs," demonstrate how the identified programs manage aging effects using attributes consistent with the industry and NRC guidance. The applicant's programs and activities that are credited with managing the effects of aging can be divided into three types of programs: existing, enhanced, and new AMPs.

In LRA Section A2.1, "Aging Management Programs and Activities," the applicant discussed that PNPS quality assurance (QA) procedures, review and approval processes, and administrative controls are implemented in accordance with the requirements of 10 CFR 50,

Appendix B. The Entergy Quality Assurance Program applies to 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 and are applicable to all aging management programs and activities that will be required during the period of extended operation. The confirmation process is part of the corrective action program and includes reviews to assure that proposed actions are adequate, tracking and reporting of open corrective actions, and review of corrective action effectiveness. Any follow-up inspection required by the confirmation process is documented in accordance with the corrective action program.

Generically, the three elements are applicable as follows:

#### **Corrective Actions**

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. Conditions adverse to quality, such as failures, malfunctions, deviations, defective material and equipment, and nonconformances, are promptly identified and corrected. In the case of significant conditions adverse to quality, measures are implemented to ensure that the cause of the nonconformance is determined and that corrective action is taken to preclude recurrence. In addition, the root cause of the significant condition adverse to quality and the corrective action implemented are documented and reported to appropriate levels of management.

#### **Confirmation Process**

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. The confirmation process is part of the corrective action program and includes

- reviews to assure that proposed actions are adequate,
- tracking and reporting of open corrective actions, and
- review of corrective action effectiveness.

Any follow-up inspection required by the confirmation process is documented in accordance with the corrective action program. The corrective action program constitutes the confirmation process for aging management programs and activities. The PNPS confirmation process is consistent with NUREG-1801.

#### **Administrative Controls**

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. Administrative (document) control for both safety-related and nonsafety-related

structures and components is accomplished per the existing document control program. The PNPS administrative controls are consistent with NUREG-1801.

#### 3.0.4.2 Project Team Evaluation

The project team reviewed the applicant's AMPs described in Appendix A, "FSAR Supplement," specifically Appendix A2.1, "Aging Management Programs and Activities," and Appendix B, "Aging Management Programs," specifically Appendix B0.3, "PNPS Corrective Actions, Confirmation Process and Administrative Controls" of the PNPS LRA. The purpose of this review was to assure that the aging management activities were consistent with the staff's guidance described in NUREG-1800, Section A.2, "Quality Assurance for Aging Management Programs (Branch Technical Position IQMB-1)," regarding QA attributes of AMPs.

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 team 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.

#### 3.0.4.3 Conclusion

The project team concluded that the QA attributes of the applicant's AMPs are consistent with 10 CFR 54.21(a)(3). Specifically, the applicant described the quality attributes of the programs and activities for managing the effects of aging for both SR and NSR SSCs within the scope of license renewal and stated that the 10 CFR Part 50, Appendix B, QA program addresses the elements of corrective action, confirmation process, and administrative control. Therefore, the applicant's QA description for its AMPs is acceptable.

**NRC STAFF LICENSE RENEWAL INTERFACE MEETING  
August 1, 2006**

- Attachment 1:           Nine Mile Point (1 & 2)**  
Safety Review PM - Tommy Le, 415 -1458  
Audit Team Leader - Ken Chang, 415-1198  
Environmental PM - Samuel Hernandez, 415-4049  
Attorney - Marian Zobler, 415-1570
- Attachment 2:           Monticello**  
Safety Review PM - Dan Merzke, 415-3777  
Audit Team Leader - Peter Wen, 415-2832  
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Attorney - Steve Hamrick, 415-4106
- Attachment 3:           Palisades**  
Safety Review PM - Juan Ayala, 415-4063  
Audit Team Leader - Robert Hsu, 415-4088  
Environmental PM - Bo Pham, 415-8450  
Attorney - Susan Uttal, 415-1582
- Attachment 4:           Oyster Creek**  
Safety Review PM - Donnie J. Ashley, 415-3191  
Safety Review PM - Veronica Rodriguez, 415-3703  
Audit Team Leader - Roy Mathew, 415-2965  
Environmental PM - Michael Masnik, 415-1191  
Attorney - Mitzi Young, 415 -1523
- Attachment 5:           Vermont Yankee**  
Safety Review PM - Jonathan Rowley, 415-4053  
Audit Team Leader - Michael Morgan, 415-2232  
Environmental PM - Rich Emch, 415-1590  
Attorney - Mitzi Young, 415-1523
- Attachment 6:           Pilgrim**  
Safety Review PM - Ram Subbaratnam, 415-1478  
Safety Review PM - Raj Auluck, 415-1025  
Audit Team Leader - James Davis, 415-6987  
Environmental PM - Alicia Williamson, 415-1878  
Attorney -Susan Uttal, 415-1582
- Attachment 7:           Projected Schedule of LR Application Submittals Through FY08**  
Steve Hoffman, 415-3245