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Date: 10/04/2007 2:32:56 PM
Subject: Industry Comments on IP 71003

Attached please find the License Renewal Task Force comments on IP 71003.

We appreciate the opportunity to comment and would like to discuss with you any comments you may believe are not warranted.

We arranged with you to transmit this via email to allow for timely review and we understand that you will docket this information.

Thank you,

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Item	Page and Section	Comment
1	Page 1, ¶01.01	This ¶ would read better if item (3) were moved to a separate paragraph. The language for item (3) should be reworded to read something like "To verify that 'newly identified' SSCs have been included in the scope of AMPs in accordance with the requirements of 10 CFR 54.37(b) and the guidance provided in RIS-2007-16.
2	Page 1, ¶01.02	Since AMPs are addressed by inference only in ¶01.01, this ¶ would be clearer if it was somehow related that the AMPs and related activities addressed are coming from the commitments, any applicable licensing conditions, and any AMP changes resulting from compliance with 54.37(b).
3	Page 1, ¶01.02	There was a question regarding the wording about AMPs and activity descriptions being included in the updated FSAR. Is this provision particular to any changes that have been made since the LRA review pursuant to compliance with §54.37(b) or commitment changes? Otherwise, these descriptions have already been reviewed during the LRA review.
4	Page 1, ¶02.01.a(1)	Since license conditions have to be met or be complied with, as opposed to implemented, it seems that this wording should be something like, "...the licensee has met or satisfied the license conditions..." (or perhaps, "...the licensee is in compliance with the license conditions...").
5	Page 1, ¶02.01.a(1)	There was also a question about the wording relative to TLAA. Does the wording mean that the inspection team will be looking at TLAA related activities that were not yet completed at the time of the issuance of the renewed license for which there are outstanding commitments? As with the UFSAR descriptions, the TLAA were reviewed in detail during the LRA review. This carries over into Item 8 below as well.
6	Page 1, ¶02.01.a(2)	The language that starts with, "...the licensee did not eliminate any commitments without approval..." would be clearer if it stated, "...the licensee did not eliminate any License Renewal Commitments listed in the SER issued with the renewed license without NRC approval, <u>or</u> the licensee properly evaluated, justified, and reported any changes to License Renewal Commitments in accordance with NEI 99-04 and 10 CFR 50.59 as applicable." Note: Consistent with the NRC's RIS-2000-17, "Managing Regulatory Commitments made by Power Reactor Licensees to the NRC Staff," we believe that the principles of the commitment change process in NEI 99-04 as approved by the NRC in SECY-00-0045 should be applied to the license renewal commitments.
7	Page 1, ¶02.01.a(3)	There is some confusion about the wording relative to the "incorporated" newly identified SSCs. Is this meant to indicate that the SSCs should have been incorporated into the renewed license basis? Clarification should be provided here to prevent possible confusion.

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8	Page 1, ¶02.01.b	The first sentence of this paragraph should read "Verify the UFSAR supplement describes the aging management programs and TLAA as approved by the NRC in the SER issued with the renewed license, or as subsequently amended." A reference to 10 CFR 54.21(d) would be appropriate here as well.
9	Page 2, ¶03.01.a	Editorial – should the last word in the lead ¶ be "manner"? Would "...covered in §01 as follows:' be more appropriate?
10	Page 2, ¶03.01.a(1)	3 rd Bullet – Editorial – suggest changing "revised license" to "renewed license."
11	Page 2, ¶03.01.a(2)	The 1 st bullet refers to "the risk significance of the commitments" without any clear guidance as to how to determine the risk associated with each of the commitments.
12	Page 2, ¶03.01.a(2)	In the 5 th bullet, the existing wording is a little awkward; suggest "the amount of time between issuance of the renewed license and the beginning of the period of extended operation" or something similar.
13	Pages 2 & 3, ¶03.01.b	The 1 st ¶ refers to "risk guidance given in the above Section 03.01.a" but the Inspection Procedure does not provide any "risk guidance." The only references to risk guidance applicable to license renewal are in the SAMA analysis guidance and in the SRP-LR. This inspection procedure should be clear on what is expected with respect to "risk significance" or "risk insights" as used on page 3.
14	Pages 2 & 3, ¶03.01.b	Instead of referring to prior NRC approval of commitment changes, a determination should be made that the licensee followed established processes for commitment management. Such processes are subject to periodic NRC inspection and should be relied on for license renewal commitments as well as other equally important commitments. The number of license renewal commitments may be a relatively small fraction of the total commitments tracked in the site commitment management program.
15	Page 3, ¶03.01.b(1)	Editorial – The IP states, "During the resolution of outstanding commitments..." It seems that "After the implementation of..." or "During the inspection of..." would be more appropriate. Pursuant to Item 4 above, the wording "...to resolve a particular license condition or commitment." would be more appropriately changed to be "...to satisfy a particular license condition or commitment."

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16	Page 3, ¶03.01.b(3)	This ¶ states that, "Any outstanding commitments after the extended period of operation commences will be subjected to NRC enforcement action." It is not clear what is intended by this statement. Some commitments may remain open or ongoing for several years if they require periodic inspections or an action scheduled to occur after the beginning of the period of extended operation. We request that NRC clarify which enforcement practice and policy will be applied to the inspections and enforcement of license renewal commitments. License renewal commitments are subject to the same inspection and enforcement actions as are other commitments and, in fact, may be a small fraction of total plant commitments.
17	Page 3, ¶03.01.c	The first sentence should be clarified similar to Item 8 above.
18	Page 3, ¶03.01.c	"The inspectors should determine if the licensee removed or added systems, structures, components or commodity groups from/to its aging management program based on review of the periodic update to the UFSAR or by queries to the licensee." seems to imply that removal of SSCs needs to be described in the periodic update to the UFSAR. This is not consistent with RIS 2007-16 and SOC, Section III.i(iii) [Additional Records and Recordkeeping Requirements] (3).
19	Page 3, ¶03.01.d	The timing for the inspections as described here is different than what some of the plants have been told. There are commitments that were made to have the related actions completed 2 years before entry into the PEO to support the PRI at that time. There are also some plant renewed license conditions that require notification of the NRC when license renewal commitments have been completed before entry into the PEO. Clarification on the PRI timing requirements/expectations and on how the NRC is to be notified that an applicant is ready for inspection would eliminate the existing confusion.
20	Page 4, ¶04	In the "Note to the Lead Inspector..." a reference to RIS-2007-16 would be useful as background for the meaning of "newly identified SSCs" and the associated expectations for documenting additions in aging management programs.
21	Page 4, ¶04	Relative to Items 5 & 8 above, clarification for what is expected relative to TLAAAs would be beneficial to avoid any confusion about the review that is needed with regard to TLAAAs.
22	Page 4	It would be useful to include a References section which would include RIS 2007-16, and NRC guidance in MC 0307 for the ROP for inspection process administration, handling of findings, preparation of reports, and performance indicators (will any new PIs become necessary to monitor AMP effectiveness?). Also references to the NRC approved NEI 98-03 guidance for UFSAR updates and NEI 99-04 guidance for the commitment change process should be included since licensees use this guidance.

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23	General Comment	<p>There is confusion within the industry about the wording in 54.37(b) relative to what is required in the 50.71(e) submittal for the reporting of "newly identified SSCs." 54.37(b) states that, "This FSAR update must describe how the effects of aging will be managed such that the intended function(s) in §54.4(b) will be effectively maintained during the period of extended operation."</p> <p>If one interprets this literally as read, the UFSAR LR Supplement will have to be revised to provide more detail on SSC evaluation and aging management than currently exists in the LR Supplement, which is at a high AMP and TLAA level basis. There would also be more detail there than was originally included in the LRA. The LRA AMR tables provide aging management information on a component type basis as opposed to the specific component basis that 54.37(b) implies is needed. It is the thinking of most of the industry that the 50.71(e) submittal would identify any UFSAR changes that are needed to document the plant change that brought the SSC into scope, including any applicable changes to the UFSAR LR Supplement that may be warranted at the detail level that is currently present there. The SSC evaluation and AMR details would be presented in the 50.71(e) transmittal letter describing how the aging management of the SSC, if required, would be accomplished. This approach would be virtually the same as the detailed responses that have been provided to LRA review RAIs. This letter would be docketed. Any specific commitments made in the letter for aging management would be added to the Commitment Table within the UFSAR LR Supplement with a due date for implementation. This approach would provide consistency of the detail level currently in the UFSAR LR Supplement and the UFSAR itself.</p> <p>The reason this comment appears with those that are specific to IP71003 is that the NRC's expectations for what the UFSAR LR Supplement should contain are not spelled out anywhere and these expectations are needed by the industry for their 54.37(b) submittals and by the NRC inspectors that will be conducting the PRIs.</p>
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