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OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

U.S. NUCLEAR REGULATORY COMMISSION

In the Matter of Entergy (Pilgrim Nuclear Power Station)

Docket No. 50-293-LR Official Exhibit No. 11

OFFERED by Applicant/Licensee Intervenor Entergy Exh. 8

NPRM Other _____

IDENTIFIED on 4-10-08 Panel _____

Action Taken: ADMITTED ~~REJECTED~~ ~~WITHDRAWN~~

Reported/Clerk Thibault

Pilgrim Nuclear Power Station
License Renewal Application
Technical Information

B.0.3 PNPS CORRECTIVE ACTIONS, CONFIRMATION PROCESS AND ADMINISTRATIVE CONTROLS

Three attributes common to all aging management programs are corrective actions, confirmation process and administrative controls. Discussion of these attributes is presented below.

Corrective actions have program-specific details which are included in the descriptions of the individual programs in this report, but further discussion of the confirmation process and administrative controls is not necessary and is not included in the descriptions of the individual programs.

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.

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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.

B.0.4 OPERATING EXPERIENCE

Operating experience for the programs and activities credited with managing the effects of aging was reviewed. The operating experience review included a review of corrective actions resulting in program enhancements. For inspection programs, reports of recent inspections, examinations, or tests were reviewed to determine if aging effects have been identified on applicable components. For monitoring programs, reports of sample results were reviewed to determine if parameters are being maintained as required by the program. Also, program owners contributed evidence of program success or weakness and identified applicable self-assessments, QA audits, peer evaluations, and NRC reviews.

B.0.5 AGING MANAGEMENT PROGRAMS

The following aging management programs are described in the sections listed of this appendix. Programs are identified as either existing or new. The programs are either comparable to programs described in NUREG-1801 or are plant-specific. The correlation between NUREG-1801 programs and PNPS programs is shown in Table B-2, with plant-specific programs listed near the end.

**Table B-1
Aging Management Programs**

1)	Boraflex Monitoring Program	B.1.1	existing
2)	Buried Piping and Tanks Inspection Program	B.1.2	new
3)	BWR CRD Return Line Nozzle Program	B.1.3	existing
4)	BWR Feedwater Nozzle Program	B.1.4	existing
5)	BWR Penetrations Program	B.1.5	existing
6)	BWR Stress Corrosion Cracking Program	B.1.6	existing
7)	BWR Vessel ID Attachment Welds Program	B.1.7	existing