

ATTACHMENT 30

SAFETY EVALUATION REPORT PROCESS REVIEW PROCEDURE

Purpose:

"The U.S. Nuclear Regulatory Commission (NRC)'s Office of the Inspector General (OIG) audited the effectiveness of the license renewal program, as documented in OIG-07-A-15, "Audit of the NRC's License Renewal Program," dated September 6, 2007 (ML072490486). The report, which is publicly available, concluded that, overall, the NRC has developed a comprehensive license renewal process to evaluate applications for extended operation. However, the OIG identified several areas where improvements would enhance program operations. One area pertained to the independent process review of Safety Evaluation Reports (SER). To enhance this program area the OIG suggested in its second recommendation that the NRC revise its report quality assurance process to include both management controls and implementing procedures which specify additional steps to ensure report quality meets management's expectations. This report process review procedure addresses the OIG recommendation and verifies the SER was prepared in accordance with current writing guidance.

Process Reviewer Qualifications and Responsibilities:

The process reviewer(s) is the individual responsible for conducting the SER process review described below. The reviewer will be assigned by the RPOB Branch Chief and will be included on the SER concurrence signature block.

The reviewer must be familiar with the SER preparation process and independent of the particular SER under review. The reviewer will gauge the effectiveness of the SER preparation by determining, on a sampling basis, whether the assigned SER follows current SER writing expectations and guidance and will elevate findings not appropriately addressed to management for resolution. The reviewer will concur in the SER after all issues are resolved to his or her satisfaction and subsequently brief the appropriate branch chiefs of the key findings, so that any improvements, lessons learned, or potential implementation issues can be appropriately addressed in subsequent SERs.

Procedure:

The process reviewer receives the SER from the Project Manager (PM) to conduct an independent process documentation review. This review is not a technical review. To optimize the review time, the process review may occur in parallel with other concurrence reviews or as individual SER sections become available.

The review will consist of samples from various sections of the SER, including Scoping/Screening, Aging Management Programs (AMPs), Aging Management Reviews

(AMRs), and Time Limited Aging Analysis (TLAAs) sections to verify that the following guidance and expectations from the PM Handbook are being followed:

1. Section 9 of Attachment 9 (SER Style Guide) – General SER Writing Expectations
2. Attachment 29 – SER Writing Guidelines and Samples

Thus, a primary focus of the review will be to ensure that the SER summarizes rather than copies relevant licensee/NRC information, clearly differentiates between applicant-provided information and the staff's independent conclusions, provides a well-articulated basis for staff findings and conclusions, and follows the guidelines and samples provided in Attachment 29.

The review should focus on samples from the more challenging areas of the SER such as AMPs/AMRs programs which are either not fully consistent with GALL, not addressed in GALL, or are plant specific, and TLAAs.

The process reviewer will provide specific feedback to the PM on any areas of concern identified in the review. This feedback will include editing through redline/strikeout, brief explanations, or generic comments, as appropriate. Potential generic comments based on the sampling may be provided to the PM to make him/her aware that similar issues may be found in numerous areas of the SER. The expectation is not for the independent reviewer to rewrite the entire report.

The process reviewer's comments should be resolved by the PM and the technical reviewers, but the process reviewer should verify the resolution is adequate. If a disagreement develops during the process review that the independent reviewer and PM cannot resolve, then the issue will be escalated to the PM's Branch Chief who has the overall responsibility for the project and the RPOB Branch Chief for resolution. The branch chiefs may further escalate the issue if necessary. If no issues are identified, or after all issues are resolved, the independent reviewer concurs on the SER. The entire independent review is expected to be completed in 24 to 40 work hours.

Within 30 days after issuance of the SER, the reviewer will brief the RPOB branch chief and the appropriate branch chiefs, usually the PM's branch chief and the engineering review branch chiefs, on the key issues identified during the review and any suggested specific or generic improvements for subsequent SERs. The branch chiefs will consider the information provided and develop and implement appropriate improvements. If no issues were identified during the review, no briefing is necessary.