

ATTACHMENT 31

OPERATING EXPERIENCE REVIEW RESPONSIBILITIES

Background

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 publically 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 consistent evaluation of operating experience. To enhance this program area the OIG suggested in its fourth recommendation that the NRC establish requirements and management controls to standardize the conduct and depth of license renewal operating experience reviews.

Implementation

Division of License Renewal management has developed the following expectations regarding review of operating experience by headquarters staff. Cognizant staff members are expected to follow these guidelines in reviewing license renewal applications.

Discussion and Expectations

In developing NUREG-1801, "Generic Aging Lessons Learned (GALL) Report," the staff reviewed industry-wide operating experience as an attribute of acceptable aging management programs. An applicant describes plant-specific operating experience and industry operating experience in its license renewal application. Applicants typically only include information on industry operating experience identified after issuance of GALL Report, Revision 1, dated September 2005, because the report already addresses industry operating experience before its publication. Both headquarters staff and regional inspectors have responsibilities for reviewing operating experience during the license renewal process. Regional inspectors review operating experience following guidance in Inspection Procedure (IP) 71002, "License Renewal Inspection;" headquarters staff review operating experience following guidance in NUREG-1800, Revision 1, "Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants" (SRP-LR). These procedures provide a clear distinction between the areas that headquarters staff and regional inspectors are to review.

According to the SRP-LR and IP 71002:

- Headquarters staff review the information in the application, including operating experience, to make a finding on the adequacy of the applicant's programs
- Regional inspectors perform inspections to verify the accuracy of information in the license renewal application, including operating experience

Therefore, the headquarters staff is expected to review operating experience following the review procedures concerning aging management review evaluations as described in the SRP-LR. The reviewer evaluates the application following guidance in SRP-LR Sections 3.1 through 3.6. Regarding operating experience, these sections all state that the reviewer confirms that the applicant:

- "... has stated that the applicable aging effects and industry and plant-specific operating experience have been reviewed by the applicant and are evaluated in the GALL Report,"
- "... has addressed operating experience identified after the issuance of the GALL Report," and
- "... has identified those aging effects ... that are contained in the GALL Report as applicable to its plant."

For aging management review results not consistent with or not addressed in the GALL Report, the reviewer evaluates the application following guidance in SRP-LR Sections 3.1.3.3, 3.2.3.3, 3.3.3.3, 3.4.3.3, 3.5.3.3, and 3.6.3.3, which point to the procedure and information in SRP-LR Appendix A.1, "Branch Technical Position RSLB-1."

It should also be noted that applicants with approved extended power uprates will be required to perform an operating experience review and its impact on aging management programs before entering the period of extended operation. SRP-LR Section 3.0.2 discusses this in more detail. SRP-LR Sections 2.1.3.1.2 and 2.1.3.1.3 note that applicants should consider operating experience in the scoping and screening of nonsafety-related structures, systems, and components that support safety related functions and of regulated events, respectively.

The headquarters staff will issue a request for additional information if information beyond the application is needed to determine whether the applicant has satisfied the acceptance criteria in the SRP-LR and the regulatory requirements of 10 CFR Part 54.

As provided in IP 71002, the regional inspectors are to verify that the applicant evaluated:

- site-specific information such as surveillance test results, preventive maintenance records, corrective maintenance records (e.g., condition reports), equipment history files, inservice test and inspection results in determining aging effects, and
- industry operational experience such as generic communications, vendor notifications, INPO notifications, etc., in determining aging effects.