

NRCREP Resource

From: Boyd Taylor [boyd.taylor@pnl.gov]
Sent: Tuesday, June 08, 2010 4:35 PM
To: NRCREP Resource
Subject: Response from "Comment on NRC Documents"

2010 JUN -9 AM 10: 55

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Boyd Taylor (boyd.taylor@pnl.gov) on Tuesday, June 08, 2010 at 16:35:06

Document_Title: NUREG-1801 Rev2

Comments: A specific "numbered" sub section should be added to AMP descriptions that defines a nominal implementation schedule of the AMP. Citing a standard or standards upon which the applicant can (and NRC for that matter) can derive a schedule can lead to ambiguity when validating completion of commitment.

A nominal implementation schedule should indicate. The minmum number of times the AMP should be executed in the period of extended operation. The earliest and latest time the applicant can intiate the the first implementation and the minimum and maximum interval of time between implmentations during the extended period of operations.

Example: Under normal conditions and results of previous implmentations (if applicable) meet expectations. The AMP should be implemented 4 times during the period of extended operations. The AMP should not be executed within the first 2 years of extended operation and the interval between implementations should not be less than 3 years or exceed 4 years.

Likewise any applicant proposing a Plant Specific or GALL AMP with modifications must discribe an implementation schedule that is "auditable" with the assumption that positive and expected results occur for each implementation.

organization: Pacific Northwest National Laboratory

address1: P.O. Box 999 MSIN: K7-22

address2:

city: Richland

state: WA

zip: 99352

country: USA

phone: 509-372-4703

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75 FR @ 78'38"
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SOWSI Review Complete
Template = ADH-013

E-REDS = ADH-03
Cedd = R. Gramann (R99)