

IPRenewal NPEmails

From: Kuntz, Robert
Sent: Monday, June 13, 2011 1:05 PM
To: MSTROUD@entergy.com
Cc: IPRenewal NPEmails
Subject: Draft RAIs
Attachments: DRAI B-OGC OpE.docx

Mike,

Attached are draft RAIs. Please review and let me know if you need a telephone conference call to discuss them. The purpose of the call would be to obtain any clarification on the draft RAI.

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From: Kuntz, Robert

Created By: Robert.Kuntz@nrc.gov

Recipients:
"IPRenewal NPEmails" <IPRenewal.NPEmails@nrc.gov>
Tracking Status: None
"MSTROUD@entergy.com" <MSTROUD@entergy.com>
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DRAI B.0.4-1

Background

Pursuant to 10 CFR 54.21(a)(3), a license renewal applicant is required to demonstrate that the effects of aging on structures and components subject to an aging management review are adequately managed so that their intended functions will be maintained consistent with the current licensing basis for the period of extended operation. Section 3.0.1 of NUREG-1800, "Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants" Revision 1 (SRP-LR), defines an aging management review as the identification of the materials, environments, aging effects, and aging management programs (AMPs) credited for managing the aging effects. In turn, SRP-LR Section A.1.2.3 defines an acceptable AMP as consisting of ten elements, including Element 10, "Operating Experience."

In addition, 10 CFR 54.21(d) requires the application to contain a final safety analysis report (FSAR) supplement. This supplement must contain a summary description of the programs and activities for managing the effects of aging and the evaluation of time-limited aging analyses for the period of extended operation.

The Indian Point Nuclear Generating Units 2 and 3 license renewal application (LRA), Section B.0.4, provides a general description of how the applicant operating experience was gathered and considered in preparing the LRA. This section also states that, "Site procedures require reviews of site and relevant industry OE [operating experience] as the site continues operation through the license renewal period."

Issue

Although LRA Section B.0.4 states that operating experience will be reviewed in the future, it does not fully describe the details of how the applicant will use future operating experience to ensure that the AMPs will remain effective for managing the aging effects during the period of extended operation. Also, it is not clear as to which AMPs will be updated based on these operating experience reviews. In addition, the LRA does not state whether new AMPs will be developed, as necessary. Further, LRA Section B.0.4 does not provide the staff reasonable assurance that ongoing operating experience reviews will continue to inform AMP updates for license renewal.

Request

Describe in detail the programmatic activities that will be used to continually identify aging issues, evaluate them, and, as necessary, enhance the AMPs or develop new AMPs for license renewal. In this description, address the following:

- Describe the sources of plant-specific and industry operating experience that are monitored on an ongoing basis to identify potential aging issues. Indicate whether these plant-specific sources require monitoring: corrective action program, system health reports, licensee event reports (LERs), and the results of inspections performed under the AMPs. Similarly, indicate whether these industry sources require monitoring: vendor recommendations, revisions to industry standards on which the AMPs are based, LERs from other plants, NRC Bulletins, Generic Letters, Regulatory Issue Summaries, Information Notices, Regulatory Guides, License Renewal Interim Staff Guidance, and revisions to NUREG-1801, "Generic Aging Lessons Learned (GALL) Report." Describe

the criteria used to classify a particular piece of information as aging related and outline the training provided to plant personnel so that they can adequately make such classifications.

- Describe how the identified aging issues are further evaluated to determine their potential impact on the plant aging management activities. Indicate whether the affected structures and components and their materials, environments, aging effects, aging mechanisms, and AMPs are identified and documented consistent with the methods used to prepare the LRA. Describe how the results of AMP inspections are considered to adjust the frequency of future inspections, establish new inspections, and ensure an adequate depth and breadth of component, material, environment, and aging effect combinations. Describe the records of these evaluations and indicate whether they are maintained in an auditable and retrievable form.
- Describe the process and criteria used to ensure that the identified enhancements are implemented in a timely manner.
- Describe the administrative controls over these programmatic activities.

Provide a summary description of these activities for the UFSAR supplement required by 10 CFR 54.21(d). If enhancements for license renewal are necessary, also provide the updates for the FSAR supplement.

If such an operating experience program is determined to be unnecessary, provide a detailed explanation of the bases for this determination.