



NUCLEAR ENERGY INSTITUTE

8/24/2011

76 FR 52995

Julie Keys
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SAFETY-FOCUSED REGULATION
NUCLEAR GENERATION DIVISION

October 18, 2011

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Ms. Cindy K. Bladey
Chief, Rules, Announcements and Directives Branch
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

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RULES AND DIRECTIVES
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Subject: Industry Response to Draft NRC Interim Staff Guidance, LR-ISG-2011-05, "Ongoing Review of Operating Experience" (*Federal Register* dated August 24, 2011; 76 FR 52995; Docket ID NRC-2011-0191)

Project Number: 689

Dear Ms. Bladey:

The subject *Federal Register* notice issued a draft Interim Staff Guidance (ISG) titled "Ongoing Review of Operating Experience" for public comment. Comments on the draft ISG were initially requested by September 23, 2011 but were extended to October 23 to allow NEI and the NRC to meet and discuss the draft comments. The purpose of this letter is to provide industry comments on the draft guidance as it was proposed in 76 FR 52995.

The draft ISG is intended to provide interim revisions to NUREG-1800, Revision 2, "Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants" (SRP-LR) and clarify the staff's acceptance criteria and review procedures with respect to the ongoing review of operating experience to ensure the effectiveness of the license renewal aging management programs (AMPs).

NEI met with the staff on October 12 and discussed industry comments on the draft ISG. The NRC indicated at that time that substantive additional changes were being considered. Unfortunately, NEI is unable to comment on the additional changes until they are released in writing in the *Federal Register*. However, our comments on the draft ISG as it was proposed in 76 FR 52995 are enclosed. In general, these comments provide clarifications and recommendations to add additional clarification to the ISG.

SUNSI Review Complete
Template = ADM-013

E-RIDS = ADM-03
Add = M. Horniack
(U5H3)

Ms. Cindy K. Bladey

October 18, 2011

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If you have any questions or require additional information, please contact me (202.739.8108; jyk@nei.org).

Sincerely,

A handwritten signature in black ink, appearing to read 'Julie Keys', with a stylized flourish at the end.

Julie Keys

c: Mr. Brian E. Holian, NRR/DLR, NRC
Mr. Matthew J. Homiack, NRR/DLR/RARB, NRC
Anne Cottingham, Esq., Nuclear Energy Institute
NRC Document Control Desk

NEI COMMENTS ON DRAFT LR-ISG-2011-05 (as published in 76 FR 52995)

Page(s)/Section(s)	Phrase	Change Discussion	Suggested Change(s)
<p>Various (see below for each specific comment)</p> <p>Page A1/SRP-LR Table 3.0-1</p> <p>Page A-2/(3) 1st indented paragraph, 4th sentence.</p> <p>Page A-4/(6) SRP-LR Table A.1-1, item 10, last sentence under Description.</p> <p>Page A-5/A.4.1, 1st partial sentence on page.</p>	<p>The phrase "or can be improved" occurring in several slightly different sentences. (see below, phrase is underlined in each example)</p> <p>".... when the review of operating experience indicates that the programs may not be full effective <u>or can be improved</u>.</p> <p>"When these reviews indicate that the programs may not be fully effective <u>or can be improved</u>, the AMPs"</p> <p>".....when the review of operating experience indicates that the AMP may not be fully effective <u>or can be improved</u>."</p> <p>"When the evaluation of operating experience information indicates that the AMPs may not be fully effective</p>	<p>We recommend deleting the phrase at the end of the sentence that reads: "or can be improved." This phrase is open-ended and very subjective. "Can be improved" can mean anything from correction of typographical errors, standard format fonts to more substantial comments. In addition, OE is a program that is designed to incorporate lessons learned and not enhance programs or procedures just because they can be enhanced. For example: Performing volumetric examinations instead of visual examinations could enhance a program but if the existing program is effective in managing the aging effects through visual examinations, it would be unnecessary and burdensome to require different examination techniques.</p>	<p>Suggestions for each occurrence below:</p> <p>The programs are either enhanced or new programs are developed when the review of operating experience indicates that the programs may not be full effective.</p> <p>When these reviews indicate that the programs may not be fully effective, the AMPs are enhanced or new AMPs are developed and implemented as appropriate.</p> <p>The AMP is either enhanced or new AMPs are developed when the review of operating experience indicates that the AMP may not be fully effective.</p> <p>When the evaluation of operating experience information indicates that the AMPs may not</p>

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<p>Page A-6/A-4.1(6) Table item 10, Last Paragraph, last sentence.</p> <p>Page A-7/A-4.1(10), 1st sentence (sentence begins on page A-6)</p>	<p><u>or can be improved</u>, the AMPs...”</p> <p>“...when the review of operating experience indicates that the AMP may not be full effective <u>or can be improved</u>.”</p> <p>“...information indicates that the AMPs may not be fully effective or can be improved, the AMPs are either enhanced or new AMPs are developed as appropriate.”</p>		<p>be fully effective, the AMPs are enhanced or new AMPs are developed and implemented as appropriate.</p> <p>“...when the review of operating experience indicates that the AMP may not be full effective.”</p> <p>“...information indicates that the AMPs may not be fully effective, the AMPs are either enhanced or new AMPs are developed as appropriate.”</p>
<p>Page A-5/ 1st paragraph, 1st bullet, 2nd sentence</p>	<p>“For example, the processes appropriately gather information on all the license renewal structures and components...”</p>	<p>The use of both “appropriately” and “all” in this sentence can be confused to mean that SSC information may not be representative of other components and therefore this information could not be applied to similar components. The result would be an increase in gathering the information for each component. Since we do not believe this is appropriate, nor do we believe this is what is meant we suggest that the word</p>	<p>“For example, the processes appropriately gather information on the license renewal structures and components....”</p>

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		<p>“appropriately” remain and the word “all” be deleted from the sentence.</p>	
<p>Page A-5/ 1st paragraph, 2nd bullet</p>	<p>“While the programs and procedures may specify reviews of certain sources of information, such as NRC generic communications and Institute of Nuclear Power Operations reports, they include any potential source of relevant plant-specific or industry operating experience information”</p>	<p>The phrase “any potential source of relevant plant-specific or industry operating experience information” is too generic and is subjective. Existing plant programs specify what constitutes operating experience and what information should be reviewed for incorporation into the AMPs. This phrase can be interpreted to believe that NRC is interested in additional information being reviewed for incorporation into AMPs or that the existing definitions of what constitutes operating experience should be expanded. If NRC believes that the current items that are reviewed as operating experience should be expanded, regulatory guidance should be issued to backfit a new definition; which may require INPO involvement since plants follow the INPO OE Guidelines.</p>	<p>We recommend a deletion of bullet 2 or a total rewrite that clarifies that the existing definitions of what constitutes OE remain sufficient.</p>

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<p>Draft ISG LR-ISG-2011-05 Page 3, 4th paragraph, 4th sentence (also inserted into GALL Chapters X and XI)</p> <p>A-6/A.4.1(9), indented sentence</p> <p>Page A-7/1st bullet, 3rd sentence</p>	<p>"However, the NRC staff's intent is for applicants to obligate themselves to review operating experience on an ongoing basis as part of implementing their AMPs...."</p> <p>"As discussed in Appendix B of the GALL Report, the ongoing effectiveness of the program is ensured through the systematic review of both plant-specific and industry operating experience."</p> <p>"In addition, the processes include the AMPs credited for managing the effects of aging, and the activities under thee AMPs (e.g., inspection methods, preventive actions, evaluation techniques, etc.)."</p>	<p>The draft ISG acknowledges the appropriateness of using generic plant operating experience review activities to identify areas where AMPs may need enhanced or new AMPs may be needed. Although the industry completely agrees with this intent, some of the language could be interpreted to imply an expectation to perform additional, discrete operating experience reviews on an AMP by AMP basis rather than ensuring that the operating experience reviews are performed as part of the existing programs. This type of wording is listed in the Phrase column. We suggest that NRC replace this language with the language that is listed on page 4 of the draft ISG (see suggest change column). We believe this wording better describes NRC's objective and should be used throughout the document.</p>	<p>"In this regard, the staff believes that guidance on the ongoing review of operating experience for license renewal should be addressed as a generic process that is used to inform each AMP and, when necessary, to develop new AMPs." (Draft ISG, page 4, 2nd full paragraph, 4th sentence)</p>
<p>Draft LR-ISG-2011-05/"Basis for Issuing Interim Guidance" section, Page 4, last sentence of 1st partial paragraph and last</p>	<p>"This LR-ISG provides an example of such a summary description...."</p>	<p>Item (7) of Appendix A provides a proposed insert for the SRP-LR, and Item (10) of Appendix A provides an insert for the GALL</p>	<p>We recommend that either NRC provides an example as indicated or the text be revised to indicate that the FSAR</p>

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<p>sentence of 1st full paragraph.</p>	<p>and <i>"...this obligation is captured in the example FSAR supplement summary description..."</i></p>	<p>report. These proposed inserts, while slightly different from each other, both provide a description of the new expectations for ongoing use of operating experience. However, the Draft LR-ISG does not provide an actual example of an FSAR summary description"</p>	<p>summary description be developed based on the guidance proved in Appendix A, Items (7) and (10) inserts for the SRP-LR and GALL. It is also recommended that NRC review these inserts and make them consistent.</p>
<p>Page A-4/Item 7, 1st sentence</p>	<p>"Insert in the SRP-LR a new Appendix A.4, "Operating Experience for Aging Management Programs."...</p>	<p>Clarify if this statement means that this is new guidance is a Branch Technical Position or if SRP-LR Appendix A is being changed to include more than just Branch Technical Positions.</p>	<p>No specific recommendations other than to provide clarification as requested.</p>