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Subject: Response to Request for Comments Pertaining to Draft License Renewal Interim Staff Guidance LR-ISG-2011-05, "Ongoing Review of Operating Experience" (Federal Register Notice 76 FR 52995, dated August 24, 2011 - Docket ID NRC-2011-0191)

Exelon Generation Company, LLC (Exelon) is submitting this letter in response to the U.S. Nuclear Regulatory Commission's (NRC's) request for comments pertaining to Draft License Renewal Interim Staff Guidance (LR-ISG) LR-ISG-2011-05, "Ongoing Review of Operating Experience."

Exelon has an established plant operating experience program and understands the importance of applying and sharing operating experience relevant to aging management of license renewal-related plant structures, systems and components (SSC), which is the focus of LR-ISG-2011-05.

Exelon appreciates the opportunity to comment on this subject and offers the comments provided in the Enclosure for consideration by the NRC.

If you have any questions or require additional information, please do not hesitate to contact Al Fulvio at 610-765-5936.

Respectfully,



Michael P. Gallagher
Vice President, License Renewal Projects
Exelon Generation Company, LLC

Enclosure: Exelon comments on Draft LR-ISG-2011-05

cc: Mr. Matthew Homiack, Division of License Renewal, NRR

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1. Draft LR-ISG-2011-05 clarifies the need for renewed license applicants and holders to conduct future and ongoing reviews of internal and external operating experience to ensure that the aging management programs credited for license renewal remain effective in managing aging effects over the term of the renewed license. We agree with this expectation. The draft ISG acknowledges the appropriateness of using generic plant operating experience review activities (such as those implemented to address Item I.C.5, of NUREG-0737) to identify areas where AMPs may be deficient or new AMPs may be needed. However, some of the language in Draft LR-ISG-2011-05 could be interpreted to imply an expectation to perform future, discrete operating experience reviews on an AMP by AMP basis, rather than ensuring that operating experience reviews that are performed as part of the ongoing Station program(s) consider the adequacy of all credited aging management programs and establish actions for improvements to existing programs or establishment of new programs, if needed.

A specific example of language in Draft LR-ISG-2011-05 that could be interpreted in this way is:

- "...the NRC staff's intent is for applicants to obligate themselves to review operating experience on an ongoing basis as part of their AMPs..." [Page 3, fourth paragraph of "Basis for Issuing Interim Staff Guidance"]

Also, the addition of the new text (repeated below) into each of the programs described in Chapters X and XI of the GALL Report, as described in Item (9) of Appendix A on page A-6 could be interpreted to require "AMP by AMP" operating experience reviews:

- "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."

The first paragraph of Item (10) of Appendix A, which contains the proposed GALL insert Appendix B, "Operating Experience for Aging Management Programs," provides a good description of the intended method and purpose for the ongoing operating experience reviews. However, the third sentence of the first bullet on page A-7 could introduce confusion relative to the method of performing the OE reviews. It states:

- In addition, the processes [i.e., processes for review of operating experience] include the AMPs credited for managing the effects of aging, and the activities under these AMPs (e.g., inspection methods, preventive actions, evaluation techniques, etc.).

We believe that the language used in the final paragraph of the "Basis for Issuing Interim Staff Guidance" section on page 4 of the draft ISG properly describes this objective, and that similar language should be used throughout the document. It says:

- "...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."

2. One of the proposed revisions to the SRP-LR involves the case where operating experience identifies an opportunity to improve an existing AMP or develop a new AMP, in order to ensure that aging effects will be managed during the PEO. One example of the proposed language that presents a concern is associated with the proposed changes to SRP-LR Table 3.0-1. The second sentence of the "Description of Program" column reads as follows:

"The programs are either enhanced or new programs are developed when the review of operating experience indicates that the programs may not be fully effective or can be improved."

Several places within Appendix A of Draft LR-ISG-2011-05 include similar or identical proposed changes.

The concern with this language is that rather than providing guidance to the NRC reviewer that operating experience should be used to provide reasonable assurance that the AMP will manage aging effects throughout the PEO, the proposed language suggests that if *any* change can possibly be made to the AMP, it should be made. We believe this guidance should be modified, because it limits the ability of the licensee to evaluate operating experience and make decisions based on its significance. While achieving excellence is an industry objective, we believe that an ISG should invoke the reasonable assurance standard.

Therefore, using the proposed changes to SRP-LR Table 3.0-1 as an example, we recommend the following change be made to the proposed language:

The programs are either enhanced or new programs are developed when the review of operating experience indicates that the **existing** programs ~~may not be fully effective or can be improved~~ **do not provide reasonable assurance that the relevant aging effects are being adequately managed.**

As noted, this comment applies to several areas of Appendix A of Draft LR-ISG-2011-05, as identified below:

Page of LR-ISG-2011-05	SRP-LR Section	Location
A-1	Table 3.0-1	"Description of Program" column, second sentence
A-2	New Sections 3.1.3.2.16, 3.2.3.2.8, 3.3.3.2.7, 3.4.3.2.5, 3.5.3.2.4, and 3.6.3.2.5	Fourth sentence of first new paragraph
A-4	Table A.1-1	"Description" column, last sentence
A-5	Proposed new section A.4.1, "Position" sub-section	Second sentence of "Position" sub-section

In addition, two related changes are recommended to the GALL report. These are located in LR-ISG-2011-05 Appendix A, as follows:

Page of LR-ISG-2011-05	GALL Report Section	Location
A-6	Table on page 6	Item 10, "Description" column, last sentence of new paragraph
A-7	After Page A-1, Proposed new "Appendix B"	End of sentence at top of page A-7.

3. In the "Basis for Issuing Interim Guidance" section, Draft LR-ISG 2011-05 indicates that the obligation to perform ongoing reviews of operating experience should be captured in a summary description in the license renewal FSAR supplement. This section of the Draft ISG indicates in part, that "This LR-ISG provides an example of such a summary description..."

The first itemized change in Appendix A of Draft LR-ISG 2011-05 inserts a new row into SRP-LR Table 3.0-1 for adding "Operating Experience" as a GALL Program, and provides a description. Please confirm that this proposed SRP-LR insert is the intended example FSAR summary description, or if not, further clarify.

4. Draft LR-ISG 2011-05 indicates in Item (7) of Appendix A that the new SRP-LR insert titled "Operating Experience for Aging Management Programs" should become a new part (Section A.4) of Appendix A to the SRP-LR. Does this mean that this new guidance is a "Branch Technical Position" or is SRP-LR Appendix A being changed to include more than just Branch Technical Positions?