

## SeabrookNPEM Resource

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**From:** Plasse, Richard  
**Sent:** Tuesday, December 06, 2011 12:33 PM  
**To:** Carley, Edward  
**Subject:** draft rai Seabrook  
**Attachments:** Seabrook RAIs B.1.4-2 and B.1.4-3 - Ongoing Review of Op. Exp.docx

[Draft RAIs](#)

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**Mail Envelope Properties** (Richard.Plasse@nrc.gov20111206123200)

**Subject:** draft rai Seabrook  
**Sent Date:** 12/6/2011 12:32:34 PM  
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**From:** Plasse, Richard

**Created By:** Richard.Plasse@nrc.gov

**Recipients:**  
"Carley, Edward" <Edward.Carley@fpl.com>  
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## Seabrook License Renewal Application Section B.1.4, "Operating Experience"

### RAI B.1.4-2

#### Background

In request for additional information (RAI) B.1.4-1, issued on May 23, 2011, the staff asked the applicant to describe the programmatic activities that will be used to continually identify aging issues, evaluate them, and, as necessary, enhance the aging management programs (AMPs) or develop new AMPs for license renewal. In its response dated June 24, 2011, the applicant described how it considers operating experience under its current operating experience review process and corrective action program. In addition, the applicant stated that it will enhance the operating experience review process and provide additional training.

#### Issue

The applicant's response provides a general description of how it considers operating experience on an ongoing basis; however, it does not directly address several areas in RAI B.1.4-1 on which the staff requested information. Further, it does not provide specific information on how the operating experience review activities address issues related to aging. The staff identified the following issues with the response.

- (a) The applicant did not fully describe the sources of plant-specific operating experience information that it monitors on an ongoing basis. As such, the staff cannot determine whether the applicant will consider an adequate scope of information from which to identify potential operating experience related to aging.
- (b) The applicant did not indicate whether it considers guidance documents to be a source of operating experience information. The content of the document, not the source, should be the most important consideration. Guidance documents, such as NUREG-1801, "Generic Aging Lessons Learned (GALL) Report," provide a convenient source of operating experience information, useful recommendations, and best practices; therefore, there is significant value in considering guidance applicable to aging management. It is not clear to the staff how, without considering guidance, the applicant's operating experience review activities will be adequate to ensure the effectiveness of the AMPs, determine when the AMPs should be enhanced, or determine when new AMPs should be developed.
- (c) The applicant did not describe a means for identifying and categorizing operating experience items as related to aging. As such, the staff cannot determine whether the applicant will process appropriately or has the means to trend effectively operating experience involving age-related degradation.
- (d) The applicant stated that it will provide additional training; however, it did not describe the details of this training with respect to aging issues. Also, it's not clear as to whether the training will be provided to those plant personnel responsible for screening, assigning, evaluating, and submitting operating experience items. As such, the staff cannot determine whether the applicant's personnel will have the appropriate knowledge to effectively process operating experience related to aging.

(e) The applicant did not describe how evaluations of operating experience related to aging consider the potentially affected plant

- systems, structures, and components,
- materials,
- environments,
- aging effects,
- aging mechanisms, and
- AMPs.

Consideration of this information is fundamental to an aging management review. As such, it is not clear to the staff how the applicant can effectively evaluate operating experience without considering this information.

(f) The applicant did not describe how it will consider as operating experience the results of the inspections, tests, analyses, etc. conducted through implementation of the AMPs. As such, the staff cannot determine whether the applicant will have the necessary information to determine whether 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.

(g) The applicant did not describe the records of operating experience evaluations or how it retains those records. As such, the staff cannot determine whether appropriate information will be retained for use by plant personnel or whether the results of implementing the operating experience review activities will be auditable and retrievable for NRC inspection and oversight purposes.

(h) The applicant did not describe timeframes for evaluating operating experience issues under the operating experience review process and corrective action program. Also, it did not state how it determines the relative significance of the operating experience issues. As such, the staff cannot determine whether the operating experience evaluations will be completed in a timely manner or whether they will be appropriately prioritized.

(i) The applicant stated that the corrective action program is the primary source of internal operating experience and it is used for degraded conditions related to the qualification or functional capability of systems, structures, and components. Based on this information, it's not clear whether use of the corrective action program is appropriate to obtain operating experience information related to aging. For example, it's not clear whether the corrective action program applies to all in-scope structures and components; their materials, environments, aging effects, and aging mechanisms; the AMPs credited for managing the effects of aging; and the activities under those AMPs.

(j) The applicant did not describe criteria for considering when AMPs should be modified or new AMPs developed due to operating experience. As such, the staff cannot determine whether the applicant can appropriately identify when changes to the aging management activities are necessary.

- (k) The applicant stated that the operating experience review process provides for the sharing of lessons learned with other utilities; however, the applicant did not provide criteria for reporting its plant-specific operating experience on age-related degradation to the industry. As such, the staff cannot determine whether the applicant has appropriate guidelines for communicating operating experience on aging to the industry.
- (l) The applicant stated that the operating experience review process is procedurally controlled; however, it did not state whether these controls provide for a formal review and approval process and periodic audits by the applicant. As such, the staff cannot determine whether the applicant has controls to appropriately manage changes or check on the effectiveness of the process.
- (m) The applicant stated that it will enhance the operating experience review process and provide additional training to process owners to include reviews of plant-specific and industry operating experience in order to confirm the effectiveness of the license renewal AMPs and to determine the need for programs to be enhanced or the need to develop new AMPs. The applicant further stated that necessary changes to AMPs would be tracked and implemented via the corrective action program; however, it's not clear whether the creation of new programs would also be implemented through the corrective action program.
- (n) The applicant committed to enhance its current station operating experience review process within ten years prior to entering the period of extended operation; however, this implementation schedule would result in a period of time when the applicant would not use the enhanced operating experience review process to confirm the effectiveness of the license renewal AMPs, determine the need for programs to be enhanced, or the need to develop new AMPs.

### Request

For the operating experience review process and corrective action program, provide a response to each item below.

- (a) Describe the sources of plant-specific operating experience that are monitored on an ongoing basis to identify potential aging issues.
- (b) Indicate whether guidance documents are considered as a source of operating experience information. If they are considered as a potential source, provide a plan for considering the content of guidance documents, such as the GALL Report, as operating experience applicable to aging management. If they are not a potential source, justify why they should not be considered as operating experience.
- (c) Describe how operating experience issues will be identified and categorized as related to aging. If an identification code is used, provide its definition or the criteria for its application. Also, describe how age-related operating experience will be trended.
- (d) Describe the training requirements and justify the level of training on aging issues for those plant personnel responsible for screening, assigning, evaluating, and submitting operating experience. Also, provide the periodicity of the training and describe how it will account for personnel turnover.

- (e) Describe how evaluations of operating experience issues related to aging will consider the following:
- systems, structures, or components
  - materials
  - environments
  - aging effects
  - aging mechanisms
  - AMPs
- (f) Describe how the results of the AMP inspections, tests, analyses, etc. will be considered as operating experience, both when they meet and do not meet the applicable acceptance criteria.
- (g) Describe the operating experience evaluation records with respect to what is considered for aging. Indicate whether these records are maintained in auditable and retrievable form.
- (h) Provide details on the timeframes for evaluating operating experience and justify why they provide for timely evaluations. Also, describe how the relative significance of operating experience items is determined so that their review can be prioritized appropriately.
- (i) Justify why use of the corrective action program is appropriate for capturing operating experience related to aging management.
- (j) Describe the criteria for considering when AMPs should be modified or new AMPs developed due to operating experience.
- (k) Provide criteria for reporting plant-specific operating experience on age-related degradation to the industry.
- (l) Indicate whether the operating experience review process is subject to a formal review and approval process and whether it is subject to periodic audits to ensure its effectiveness.
- (m) Clarify whether the creation of new programs will be implemented through the corrective action program.
- (n) Justify why use of the operating experience review process is adequate, without enhancement until within ten years prior to entering the period of extended operation, to ensure the AMPs are effective to manage the aging effects for which they are credited, or to enhance the programs or develop new programs when the review of operating experience indicates that the programs may not be effective.

For any additional enhancements identified as necessary based on the response to the above items, provide and justify the implementation schedule for incorporating the enhancements into the existing programmatic operating experience review activities.

### **RAI B.1.4-3**

#### Background

In RAI B.1.4-1, the staff asked the applicant to provide for the UFSAR supplement a summary description of the programmatic activities for the ongoing review of operating experience, as required by 10 CFR 54.21(d). By letter dated August 25, 2011, the applicant provided this description:

The existing Corrective Action Program and the Operating Experience Program ensure, through the continual review of both plant-specific and industry operating experience, that the license renewal aging management programs are effective to manage the aging effects for which they are credited. The programs are either enhanced or new programs are developed when the review of operating experience indicates that the programs may not be effective. For each aging management program, operating experience is reviewed on a continuing basis.

#### Issue

As described in the issue section of RAI B.1.4-2, the applicant described generally how it intends to consider operating experience on an ongoing basis; however, it did not provide specific information on how its operating experience review activities address issues related to aging. Similarly, the above entry for UFSAR supplement also lacks detail on how aging is considered in the ongoing operating experience reviews.

#### Request

Consistent with the response to RAI B.1.4-2, provide additional details in the UFSAR supplement on how the ongoing operating experience review activities address issues specific to aging. Include in the UFSAR supplement the implementation schedule for these activities.