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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 November 25, 2011; 76 FR 72765; Docket ID NRC-2011-0191)

Project Number: 689

Dear Ms. Bladey:

The subject *Federal Register* notice re-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. Industry provided comments to the draft guidance as it was issued in 76 FR 52995 on October 18, 2011. However, the NRC made substantive changes to the initial draft and re-issued the ISG for public comment in 76 FR 72765. The purpose of this letter is to respond to those changes.

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). An additional purpose of the draft ISG is to provide clarification and to augment the Operating Experience (OE) program to ensure that "operating experience related to aging is captured and used appropriately." However, we believe this ISG goes well beyond the intended purpose and should be withdrawn. Some of the rationale for our request to withdraw the draft ISG is as follows:

- The GALL report provides guidelines for Aging Management Programs after the Period of Extended Operation is entered. As such, the phrase the NRC adds throughout the draft ISG, "no later than the date the renewed license is issued," is irrelevant in the GALL because plants are not committed to the GALL until after entering the extended period of operation.

SUNSI Review Complete

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The phrase as currently stated seeks to extend renewed license requirements into the period after their license extension is granted but before it is entered. This would clearly require a backfit analysis and is not addressed in the backfit analysis provided with the draft ISG.

- The draft ISG also delineated six programmatic changes to the OE and/or Corrective Action Programs (CAP) that would be in effect after entering the extended period of operation. Currently, these issues are covered in multiple plant processes; however, the draft ISG is suggesting specific, very prescriptive changes to the OE and CAP programs that are neither appropriate nor conducive with the current implementation processes of these programs. Even though these changes would be effective after the extended period of operation, we strongly believe a backfit analysis is required that properly assesses the changes to major industry programs. License renewal programs have always been implemented with the intent to work within existing plant programs. Wholesale changes to major industry programs have not been the order of business, and it would be inappropriate to not acknowledge that a backfit analysis is required for the types of changes outlined in the draft ISG.
- Much of the draft ISG contains vague subjective wording that would be difficult to implement and inspect with consistency. Several of the attached comments refer to the wording subjectivity. In addition, much of the detailed prescriptive guidance contained in the draft ISG is unnecessary. For example, it requires the addition of a specific code in the CAP to "trend issues." It is inappropriate for an ISG to change how an established and accepted plant program functions. In addition, it is not clear what "trend issues" means, if licensees would be looking for increasing or decreasing trends, and if these trends would be limited to safety significance. NEI believes that trending and requiring actions is a new NRC expectation that, again, requires a proper backfit analysis for changes to the CAP.
- The NRC also issued Generic Letter (GL) 82-04 to acknowledge that the Institute of Nuclear Power (INPO) OE program relieves individual plants of the necessity of setting up large staffs to obtain and screen large volumes of raw data pertaining to OE throughout the industry. The GL also states that the INPO OE program "is acceptable to the staff with no additional review required," and it strongly encourages all utilities to participate. Changing expected industry requirements through an ISG, for only those plants that apply for license renewal, upsets regulatory stability, creates confusion, and increases licensee burden without providing a nexus to safety for the changes suggested in the draft ISG.
- NEI believes that the six program enhancements in the draft ISG are inconsistent with the intent of the OE program as stated in GL 82-04 in that additional staff will be required to obtain and screen raw data and focuses industry efforts on additional data collection that has no safety significance rather than concentrating efforts on proper evaluation of events that occur in the plants and are identified through the INPO OE process. We also believe

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that the draft ISG is inconsistent with its stated purpose to clarify the existing GALL report in that it goes well beyond clarification and dictates specific requirements without justification.

NEI strongly encourages the NRC to continue their practice of allowing the OE program to focus on performance and results rather than dictating the process as outlined in the current draft ISG. Therefore, we are requesting that the staff withdraw the draft ISG. We believe that industry has existing programs that satisfy the intent of the ISG. In addition, we have not seen a problem statement from the NRC that identifies the specific issue that warrants the issuance of an ISG—especially one so prescriptive. We also note that the draft ISG does not assert that it is being implemented because of any safety issues. However, we would be more than willing to work with the NRC to define the potential issues with the OE program and work to clarify or develop solutions.

We have included specific comments to the ISG in Attachment 1, although we strongly believe the NRC should withdraw the draft ISG and continue to work with the industry to identify and focus the issue and develop appropriate solutions as needed. Attachment 2 provides the comments that were previously submitted in response to 76 FR 52995. Note that because of the shortened time to comment on the re-issued ISG, we have not been able to comment on each item in its entirety and have only included the more important comments.

If you have any questions or require additional information, please contact me (202-739-8108; jyk@nei.org).

Sincerely,



Julie Keys

Attachments

c: Mr. Bruce A. Boger, NRR, NRC
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NEI Comments on Draft LR-ISG-2011-05 (Revised)

Page(s)/Section(s)	Phrase	Change Discussion	Suggested Change(s)
<p>Page 4 last paragraph, second sentence.</p> <p>page A-7, first paragraph after the bullets, first sentence</p> <p>page A-11, first paragraph after the bullets, first sentence</p>	<p>"...no later than the date the renewed license is issued and then implemented on an ongoing basis throughout the term of the renewed license,"</p>	<p>The GALL report provides guidelines for Aging Management Programs during the Period of Extended Operation. As such, the phrase "no later than the date the renewed license is issued" is irrelevant in the GALL. However, current Part 50 Operating Experience practices do encompass the intent of the 6 programmatic changes NRC has suggested. If the NRC would like changes to the Part 50 OE program, we strongly believe a backfit analysis would be required. In addition, we believe that GL 82-04 also would require a revision. The current generic letter states that the INPO OE program "is acceptable to the staff with no additional review required" and it strongly encourages all utilities to participate.</p>	<p>Pages 4, A-7, & A-11</p> <p>We recommend this phrase be revised as follows to be consistent with implementation of other license renewal requirements: "...prior to the period of extended operation."</p>
<p>Page A-6 first paragraph</p> <p>Page A-9 first paragraph after the six bullets</p>	<p>"Further, the applicant should implement, as necessary, the following enhancements to ensure that its programmatic activities for the ongoing review of operating experience ..."</p>	<p>The generic letter acknowledges that the INPO program relieves individual plants of the necessity of setting up large staffs to obtain and screen large volumes of raw data pertaining to OE throughout the industry. However, implementation of the 6 program</p>	<p>As stated in our letter, NEI believes that the 6 program enhancements in the draft ISG, are clearly a backfit to the existing Part 50 period of operation and are inconsistent with the intent of the OE program as stated in GL 82-04 for both the current operation and the extended period of operation. Therefore, we believe the ISG should be withdrawn.</p> <p>However, the industry is also willing to work with NRC to better define any issues NRC believe exist with the OE program and to find the appropriate resolution of to any clearly defined issues the NRC has.</p>

NEI Comments on Draft LR-ISG-2011-05 (Revised)

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		<p>changes as written in the draft ISG will require additional licensee burden without any nexus to safety.</p> <p>NEI believes that the 6 program enhancements in the draft ISG are clearly a backfit to the existing Part 50 period of operation and are inconsistent with the intent of the OE program as stated in GL 82-04.</p>	
Page 4, Next to last paragraph	“Notwithstanding the continued use of existing programmatic activities for the ongoing review of operating experience, there are several areas where these activities should be augmented for license renewal.”	Change adds areas where activities should be augmented for license renewal is not worded appropriately. It assumes that all applicants programs don’t already include these activities which are an incorrect assumption.	Add the words “as required” after augmented.
Page 5, First full paragraph	“The primary example of such a document is a revision to the GALL Report. Generally these kinds of documents provide historical information and lessons learned in response to operating experience information over a period of time. As such, it is expected that the operating experience in these documents already will have been identified and evaluated. Nevertheless, it is	The added paragraph on page 5 related to the use of GALL as operating experience continues to espouse the position that the GALL report is OE. The GALL report isn’t OE. It documents the NRC recommendations to address operating experience. There is no unique operating experience related to aging identified in GALL. The discussion beginning with “Generally these kinds of	Change the affected section of the paragraph to say, “The GALL report is based on operating experience. As such, it is expected that the operating experience in the GALL report will already have been identified and evaluated.”

Attachment 1

NEI Comments on Draft LR-ISG-2011-05 (Revised)

Page(s)/Section(s)	Phrase	Change Discussion	Suggested Change(s)
	also important to consider the historical lessons learned to provide a check on the adequacy of the initial responses to the operating experience."	documents..." is too vague to be actionable or enforceable.	
Page 5	NEWLY IDENTIFIED SYSTEMS, STRUCTURES, AND COMPONENTS UNDER 10 CFR 54.37(b)	This discussion of newly identified is simply confusing. It seems obvious that an OE review is not an SSC, newly identified or otherwise. The meaning of the second sentence is also not apparent.	Delete this section.
Page A-2 Item (3)	"The applicant's AMPs should contain the element of operating experience. The reviewer verifies that the applicant has appropriate programs or processes for an ongoing review of both plant-specific and industry operating experience related to aging management. Such reviews are used to ensure that the AMPs are effective to manage the aging effects for which they are credited. When these reviews indicate that the programs may not be fully effective or can be improved, the AMPs are enhanced or new AMPs are developed and implemented, as appropriate. Additional information is in Appendix A.4, "Operating Experience for Aging	<p>The two paragraphs under item 3 are mostly applicable to the generic process for OE review. These two paragraphs should not be included in each specific technical review section as suggested. Discussion related to the generic OE review process should only be provided in one location. This is consistent with words from the draft ISG saying "Therefore, the staff believes that the SRP-LR and the GALL Report should address the ongoing review of operating experience in the same fashion as the quality assurance program."</p> <p>The first sentence of the first paragraph is all that is needed in each individual section referenced</p>	Change to read, "The applicant's AMPs should contain the element of operating experience."

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	Management Programs.””	here. In addition, there is no guidance provided regarding the expected content of the operating experience element in each AMP description.	
Page A-2 Item (4)	Suggests adding operating experience program to lists of AMPs in various SRP sections.	The suggested addition of the OE review program to these lists of AMPs is inappropriate. The OE process as conceived in the ISG is intended to inform AMPs. It, itself, is not an AMP.	Delete item (4).
Page A-3 Item (5)	Suggested revision to SRP Section A.1.2.3.10. (Paragraph 1.)	Generally, Section A.1.2.3 describes the content of the elements of an aging management program. The ongoing review of OE is not an element of individual AMPs, but is a common process applicable to all AMPs. It is inefficient to suggest that the OE review process be described in each AMP of a license renewal application. This information should be reviewed in one place; not in the OE element of each individual AMP.	Delete paragraph 1 of Section A.1.2.3.10.
Page A-3 Item (5)	Suggested revision to SRP Section A.1.2.3.10. (Paragraphs 2. and 3.)	The words “currently available” are redundant and unnecessary at the beginning of these two paragraphs. It is difficult to comprehend how one would discuss OE that is not currently available.	Delete “currently available” from the beginning of paragraph 2 and paragraph 3 of Section A.1.2.3.10.

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Page A-3 Item (5)	Suggested revision to SRP Section A.1.2.3.10. (Paragraph 3.)	For new GALL AMPs, the OE identified in the OE section of that AMP's GALL description is often the most relevant OE related to the new AMP. This is the OE that identified the potential need for the AMP and that demonstrates its likely effectiveness at a specific plant. This paragraph should acknowledge the significance of the GALL OE for cases where a new AMP has no relevant plant-specific operating experience.	Revise paragraph 3 of Section A.1.2.3.10 to acknowledge the significance of the GALL OE for new AMPs.
Page A-4 Item 7	"Operating experience is a very important element of an effective aging management program (AMP)."	While this is a true statement, if fails to acknowledge the extent to which OE is ingrained into the GALL report AMPs. Each AMP is based on relevant OE accrued over decades of nuclear power plant operation. Rarely does plant-specific OE significantly impact an AMP. Therefore, this statement adds no value and leaves industry wondering why it exists here.	Delete the first sentence of A.4.1.
Page A-5	Bullet points following "To this end, the applicant should ensure that its processes adequately address the following points:"	Bullet points are vague and difficult to interpret consistently. It will be difficult to implement or enforce these items. Interpretations could be far-reaching. For example, the first bullet says the processes appropriately gather information	NEI strongly recommends NRC withdraw the draft ISG.

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		on all the license renewal structures and components identified in the integrated plant assessment, and their materials, environments, aging effects, and aging mechanisms. This is a lot of information to gather. The second bullet says "programs and procedures...include any potential source of relevant plant-specific or industry operating experience information." There may be a lot of "potential" sources of relevant information depending on the outlook of each individual.	
Page A-6	Bullets characterized as enhancements to ensure that programmatic activities for the ongoing review of operating experience can appropriately capture and evaluate operating experience related to aging management.	The ISG as a whole and particularly these bullet points are full of vague subjective wording that will be difficult if not impossible to implement and consistently enforce. Example phrases are: "appropriately capture," "broadly identify and trend issues," and "ensure an adequate depth and breadth of component, material, environment, and aging effect combinations." Data is relatively easy to trend. It is not so clear what it means to "trend issues."	NEI strongly recommends NRC withdraw the draft ISG.
Page A-6 second bullet	"Guidance documents and other publications, when they contain lessons learned applicable to	What would be considered a guidance document that contains lessons learned? There is not	NEI strongly recommends NRC withdraw the draft ISG. However, at a minimum this section should

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	aging management, are considered as operating experience and evaluated accordingly. There are written plans and expectations for finding this type of document and processing it as operating experience. An example of such documents is a revision to NUREG-1801, "Generic Aging Lessons Learned (GALL) Report.""	<p>enough here to keep this from becoming a Pandora's box. This could include all the documents published by outside organizations such as EPRI, NRC or NACE, AWWA, ASTM, ISA that sites may not have access to nor be aware of nor have the ability to review all of these documents. All revisions to standards include lessons learned. This could mean the industry needs to incorporate all the latest standards applicable to their site.</p> <p>This bullet seems to require evaluation of guidance documents and other publications that NRC believes provides lessons learned during the identification of operating experience. However, as currently written in the draft ISG "other relevant plant specific or industry OE information" is ambiguous and may include many documents which are outside of current industry practices and those endorsed in GL 82004.</p>	<p>be deleted or revise the bullet to read: Guidance documents and other publications, when they contain lessons learned applicable to aging management, are considered as operating experience and evaluated accordingly when enhancing or creating new AMPs. Examples of such documents are EPRI chemistry guideline revision, ASME Code changes, and revisions to NUREG-1801, "Generic Aging Lessons Learned (GALL) Report".</p>
Page A-6 third bullet, Page A-10 third bullet.	"When it is determined that a formal evaluation of operating experience is necessary, it is	The applications of this bullet to the identification of operating experience with aging	Revise the bullet to read: Evaluation of plant specific and industry operating experience

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	completed and prioritized commensurate with the potential significance of the issue. Such evaluations are documented and retained in an auditable and retrievable form."	<p>management impacts or the evaluation of AMP enhancements or new AMPs needs to be clarified. The use of the word "all" may not apply to every evaluation of plant specific and industry operating experience – there will be some operating experience items that do not contain aging issues. Evaluations should apply to plant-specific and industry operating experience that has been identified as containing issues associated with aging. Evaluations may consider aging mechanisms, but need to evaluate management of aging effects.</p> <p>All plant evaluations require documentation and are retained in accordance with the current programs they are evaluated under. To specifically call this item out for retention and documentation raises the question if NRC is looking for more than that which is accomplished under established major plant programs that perform these evaluations. If so, this is a backfit and should be evaluated as such. If not, then</p>	<p>that has been identified as containing issues concerning age-related degradation shall be evaluated for potential aging management impacts. These evaluations should consider the impact of the aging on the effectiveness of the AMP to manage aging.</p> <p>In addition: Remove the statement "Such evaluations are documented and retained in an auditable and retrievable form."</p>

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		mentioning it only causes confusion.	
Page A-6 fifth bullet	“training is provided so that these individuals can appropriately identify when operating experience has the potential to involve age-related degradation.”	This is not necessary training. It places an undue emphasis on OE potentially involving age-related degradation. OE review personnel are trained and qualified to review OE items and assign them to the appropriate plant personnel, regardless of whether they involve age-related degradation. OE involving age-related degradation seems no more important than OE involving maintenance or operational events. This undue emphasis on OE involving age-related degradation may well divert resources from the evaluation of more significant OE items resulting in a net decrease in plant safety. The whole discussion of training seems to go to a level of detail in prescribing the desired licensee response that is uncommon for anything other than specific well defined technical issues.	Delete all discussion of training specific to “aging management” and “age-related degradation.”
Page A-7 second paragraph	“Additional training is necessary for those personnel who oversee and implement the aging management activities. In general, the level of training	Page A-7 specifies establishing specific training programs for the review of OE. Again this seems to go well beyond the level of detail typical of NRC guidance. This at	Delete everything after “Training should be provided for personnel who oversee and implement the aging management activities.”

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	should be commensurate with the overall responsibilities for implementing the aging management activities. For example, a supervisor should receive additional training on the aging management activities which he or she oversees, whereas a subject matter expert (i.e., an aging management program owner) should receive more in-depth training so that he or she is completely familiar with all aspects of the aging management activities for which he or she is responsible. In all cases, the training is provided on a periodic basis and includes provisions to accommodate the turnover of plant personnel. “	the most should specify that personnel reviewing OE be qualified to perform review and identification of OE. It should be up to the licensee to determine training requirements and levels of review. This is no different than other aging management programs that require qualified individuals in accordance with industry standards.	

Attachment 2

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

Page(s)/Section(s)	Phrase	Change Discussion	Suggested Change(s)
Various (see below for each specific comment)	The phrase "or can be improved" occurring in several slightly different sentences. (see below, phrase is underlined in each example)	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.	Suggestions for each occurrence below:
Page A1/SRP-LR Table 3.0-1	".... when the review of operating experience indicates that the programs may not be full effective <u>or can be improved</u> ."	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.	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.
Page A-2/(3) 1 st indented paragraph, 4 th sentence.	"When these reviews indicate that the programs may not be fully effective <u>or can be improved</u> , the AMPs"		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.
Page A-4/(6) SRP-LR Table A.1-1, item 10, last sentence under Description.	".....when the review of operating experience indicates that the AMP may not be fully effective <u>or can be improved</u> ."		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.
Page A-5/A.4.1, 1 st partial sentence on page.	"When the evaluation of operating experience information indicates that the AMPs may not be fully effective		When the evaluation of operating experience information indicates that the AMPs may not

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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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		"appropriately" remain and the word "all" be deleted from the sentence.	
Page A-5/ 1 st paragraph, 2 nd bullet	"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"	The phrase "any potential source of relevant plant-specific or industry operating experience information" is to 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.	We recommend a deletion of bullet 2 or a total rewrite that clarifies that the existing definitions of what constitutes OE remain sufficient.

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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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sentence of 1 st full paragraph.	and "...this obligation is captured in the example FSAR supplement summary description...."	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"	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.
Page A-4/Item 7, 1 st sentence	"Insert in the SRP-LR a new Appendix A.4, "Operating Experience for Aging Management Programs."...	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.	No specific recommendations other than to provide clarification as requested.