

Davis-BesseNPEm Resource

From: CuadradoDeJesus, Samuel
Sent: Friday, December 16, 2011 2:23 PM
To: custerc@firstenergycorp.com; dorts@firstenergycorp.com
Cc: Davis-BesseHearingFile Resource
Subject: Revised Operating Experience follow-up RAIs
Attachments: RAI Letter Op Exp RARB 11 25 2011.docx

Importance: High

Cliff,

I sent the attached RAIs to you previously. However, after that the reviewer made some changes to them. Attached is the current version of the operating experience RAIs.

Regards,

Samuel Cuadrado de Jesús

Project Manager

Projects Branch 1

Division of License Renewal

U.S. Nuclear Regulatory Commission

Phone: 301-415-2946

Samuel.CuadradoDeJesus@nrc.gov

Hearing Identifier: Davis_BesseLicenseRenewal_Saf_NonPublic
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Subject: Revised Operating Experience follow-up RAIs
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From: CuadradoDeJesus, Samuel

Created By: Samuel.CuadradoDeJesus@nrc.gov

Recipients:

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RAI Letter Op Exp RARB 11 25 2011.docx		59221

Options

Priority: High
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received:

Barry S. Allen, Vice President
Davis-Besse Nuclear Power Station
FirstEnergy Nuclear Operating Company
5501 North State Route 2
Oak Harbor, OH 43449

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE
DAVIS-BESSE NUCLEAR POWER STATION LICENSE RENEWAL
APPLICATION (TAC NO. ME4640)

Dear Mr. Allen:

By letter dated August 27, 2010, FirstEnergy Nuclear Operating Company submitted an application pursuant to Title 10 of the *Code of Federal Regulations* Part 54 for renewal of Operating License NPF-3 for the Davis-Besse Nuclear Power Station. The staff of the U.S. Nuclear Regulatory Commission (NRC or the staff) is reviewing this application in accordance with the guidance in NUREG-1800, "Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants." During its review, the staff has identified areas where additional information is needed to complete the review. The staff's requests for additional information are included in the enclosure. Further requests for additional information may be issued in the future.

Items in the enclosure were discussed with Cliff Custer, of your staff, and a mutually agreeable date for the response is within 30 days from the date of this letter. If you have any questions, please contact me by telephone at 301-415-2946 or by e-mail at Samuel.CuadradoDeJesus@nrc.gov.

Sincerely,

Samuel Cuadrado de Jesús, Project Manager
Projects Branch 1
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket No. 50-346

Enclosure:
As stated

cc w/encl: Listserv

Barry S. Allen, Vice President
Davis-Besse Nuclear Power Station
FirstEnergy Nuclear Operating Company
5501 North State Route 2
Oak Harbor, OH 43449

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Sincerely,

Samuel Cuadrado de Jesús, Project Manager
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Division of License Renewal
Office of Nuclear Reactor Regulation

Docket No. 50-346

Enclosure:

As stated

cc w/encl: Listserv

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See next page

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*concurrence via e-mail

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DATE	11/30/2011	12/ /2011	12/ /2011	12/ /2011

OFFICIAL RECORD COPY

Letter to B. Allen from S. Cuadrado DeJesus dated, December XX, 2011

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE
DAVIS-BESSE NUCLEAR POWER STATION LICENSE RENEWAL
APPLICATION (TAC NO. ME4640)

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P. Cooper

B. Harris (OGC)

M. Mahoney

DAVIS-BESSE NUCLEAR POWER STATION
LICENSE RENEWAL APPLICATION
REQUEST FOR ADDITIONAL INFORMATION

RAI B.1.4-2

Background:

In request for additional information (RAI) B.1.4-1, issued on May 19, 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 stated that it currently has a procedurally controlled operating experience review process, as required by NUREG-0737, "Clarification of TMI Action Plan Requirements," Item I.C.5, "Procedures for Feedback of Operating Experience to Plant Staff." The applicant stated that this process provides for the systematic identification and transfer of lessons learned from site and industry experience into fleet and station processes to prevent events and enhance the safety and reliability of its operations.

Issue:

The applicant's response provided 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, the applicant's response did not provide specific information on how the operating experience review activities address issues specific to aging. The staff identified the following issues with the applicant's response:

- (a) The applicant did not describe the sources of plant-specific operating experience information that it monitors on an ongoing basis. Additional details are needed to determine whether the applicant will consider an adequate scope of information from which to identify potential operating experience related to aging.
- (b) It is not clear as to whether the applicant only reviews certain sources for operating experience information. Additional information is needed to determine whether the applicant's processes would preclude the consideration of relevant operating experience information, because it is not from a prescribed source.
- (c) The staff requested that the applicant indicate which guidance documents require monitoring. The applicant did not indicate whether it considers guidance documents to be a source of operating experience information.
- (d) The applicant did not describe its criteria for identifying and categorizing operating experience items as related to aging. .
- (e) The staff requested that the applicant describe training provided to plant personnel. The applicant did not describe training on aging issues, nor did it indicate whether the

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training will provided for those plant personnel responsible for screening, assigning, evaluating, and submitting operating experience items.

- (f) 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.
- (g) 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.
- (h) The applicant did not describe the records of operating experience evaluations or how it retains those records.
- (i) The applicant stated that operating experience evaluations are prioritized with due dates procedurally specified based on the potential significance of the issue; however, the applicant did not provide details on the evaluation schedules or how it determines the relative significance of issues. It is therefore unclear whether the operating experience evaluations will be completed in a timely manner or whether they will be appropriately prioritized.
- The applicant stated that it enters operating experience that potentially represents a condition adverse to quality into the corrective action program; however, the applicant did not explain how a “condition adverse to quality” includes aging. Additional information is needed to determine whether the corrective action program has a threshold appropriate to capture items related to aging.
- (j) The applicant did not describe criteria for considering when AMPs should be modified or new AMPs developed due to operating experience. It also did not describe how it implements these kinds of changes or how it ensures the changes are implemented in a timely manner.
- (k) The applicant stated that it shares lessons learned with other utilities to promote industry-wide safety and reliability; however, the applicant did not provide criteria for reporting its plant-specific operating experience on age-related degradation to the industry.

Request:

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 plant-specific and industry operating experience is only considered from a prescribed list of sources. If only prescribed sources are considered, provide a justification as to why it is unnecessary to consider other sources.
- (c) 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.
- (d) Describe how operating experience issues will be identified and categorized as related to aging.
- (e) Describe the training requirements on aging issues for those plant personnel responsible for screening, evaluating, and submitting operating experience items.
- (f) Describe how evaluations of operating experience issues related to aging will consider the following:
- systems, structures, or components
 - materials
 - environments
 - aging effect
 - aging mechanisms
 - AMPs
- (g) Describe how the results of the AMP inspections, tests, analyses, etc., will be considered as operating experience.
- (h) 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.
- (i) Provide details on the operating experience evaluation schedules and justify why they provide for timely evaluations. Also, describe how the relative significance of operating experience items is determined so that the reviews can be prioritized appropriately.
- (j) Justify why the corrective action program has an appropriate threshold for capturing issues concerning aging.
- (k) Describe the criteria for considering when AMPs should be modified or new AMPs developed due to operating experience. Also, describe the process for implementing changes to the AMPs or for implementing new AMPs; describe how these changes are implemented in a timely manner.

- (l) Provide criteria for reporting plant-specific operating experience on age-related degradation to the industry.

If enhancements are necessary, provide an implementation schedule for incorporating them 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, in accordance with 10 CFR 54.21(d), a USAR supplement summary description of the programmatic activities for the ongoing review of operating experience. By letter dated August 17, 2011, the applicant provided this description:

Existing FENOC processes require reviews of relevant site and industry operating experience and periodic benchmarking to ensure program enhancements are identified and implemented. Such ongoing reviews identify potential needs for aging management program revisions to ensure their effectiveness throughout the period of extended operation.

Issue:

As described above in 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 USAR supplement also lacks details 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 USAR supplement on how the ongoing operating experience review activities address issues specific to aging.