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Subject: Response to Request for Comments Pertaining to the Revised Draft License Renewal Interim Staff Guidance (LR-ISG) LR-ISG-2011-05, "Ongoing Review of Operating Experience" (Federal Register Notice 76 FR 72725, dated November 25, 2011 - Docket ID NRC-2011-0191)

Reference: Exelon Letter to NRC, "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)," dated October 18, 2011

In the letter referenced above, Exelon Generation Company, LLC (Exelon) submitted comments to the NRC pertaining to Draft License Renewal Interim Staff Guidance LR-ISG-2011-05, "Ongoing Review of Operating Experience."

This letter provides Exelon comments pertaining to the revised version of Draft License Renewal Interim Staff Guidance (LR-ISG) LR-ISG-2011-05, in response to NRC's request published in the Federal Register on November 25, 2011. These new comments do not replace, but rather are in addition to the comments provided in the referenced letter.

Exelon agrees with NRC that it is appropriate to enhance existing operating experience programs to ensure aging related operating experience is applied to aging management activities on an ongoing basis as plants with renewed licenses enter into their respective periods of extended operation. However, we believe that the intense NRC staff focus in this ISG on details associated with *how* aging-related operating experience will be incorporated into U.S. nuclear plant operating experience programs is unnecessary and overly prescriptive.

Exelon believes that although it is appropriate to require aging management-related enhancements to existing operating experience review programs, the existing programs are robust, and the descriptions of the enhancements currently being proposed by NRC staff are in some cases more prescriptive than what is necessary to ensure that aging related operating experience will be properly addressed. Quoting from a discussion in the License Renewal Rule Statements of Consideration associated with the concept of backfit protection, "The Commission does not intend to impose requirements on a licensee that go beyond what is necessary to

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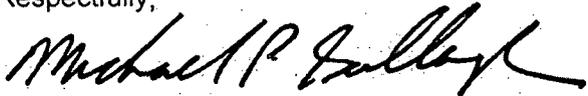
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manage aging effects." Exelon believes that some of the guidance proposed in the current Draft LR-ISG-2011-05 goes beyond this Commission guidance.

In a related matter, Exelon notes that NRC issued a revision to Inspection Procedure IP-71152, "Problem Identification and Resolution" on December 5, 2011, effective January 01, 2012 that includes guidance to Regional Inspectors for evaluation of licensee performance related to aging management activities. While Exelon believes that the new guidance is technically appropriate, the timing for when it should be applied to plants with renewed licenses may be confusing. The guidance implies that aging management programs are established at the time a renewed license is issued. Although in many cases this is true, especially with pre-existing programs credited for aging management, new or enhanced programs are generally not required to be effective until a plant enters its period of extended operation, which is often at least several years after the renewed license is issued. Similarly, Exelon sees no basis as to why a plant should be required to implement the operating experience program enhancements described in Draft LR-ISG-2011-05 earlier than prior a plant entering its period of extended operation. This point is included as comment # 2 in the Enclosure to this letter.

If you have any questions or require additional information, please contact Al Fulvio at 610-765-5936.

Respectfully,



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

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

cc: Mr. Matthew Homiack, Division of License Renewal, NRR
Ms. Julie Keys, Senior Project Manager, NEI

Comment 1

The design of the existing nuclear plant operating experience assessment programs, put in place in response to Item I.C.5 of the TMI Action Plan, resulted from work performed by INPO and nuclear industry representatives after the TMI-1 accident in 1979. The NRC reviewed this industry approach for identifying, evaluating and learning from operating experience, and endorsed its acceptability in Generic Letter 82-04.

The enhancements to industry operating experience programs currently being proposed in LR-ISG-2011-05 have not had the benefit of review and input from INPO or personnel within NRC responsible for review of operating experience.

Proposed Resolution

The NRC Division of License Renewal staff should engage INPO and the appropriate NRC groups responsible for operating experience review and evaluation to ensure that changes resulting from license renewal implementation are appropriate from a broad perspective.

Comment 2

The timing for enhancements or augmentations to existing operating experience review programs is discussed several places within the document. One example is in the paragraph beginning on the bottom of page 4. The proposed guidance states, in part:

“To ensure no gaps in the consideration of available information, the augmentations should be incorporated into the programmatic operating experience review activities no later than the date the renewed license is issued and then implemented on an ongoing basis throughout the term of the renewed license. In this way, operating experience on age-related degradation can be used to inform the aging management activities currently being implemented or planned to be implemented in the future, and it can be used to determine when new activities are necessary.”

Implementation of the enhancements to the operating experience program should be performed on a schedule consistent with enhancements being made to existing aging management programs (AMPs) or establishment of new AMPs for license renewal. As stated in Section 3.0.1 of the NUREG-1800 Revision 2 (SRP-LR), “Enhancements are revisions or additions to existing aging management program(s) that the applicant commits to implement prior to the period of extended operation.”

Proposed Resolution

It is recommended that the language of the above cited paragraph be revised as follows. Proposed additions are shown in ***bolded italics***; deletions in ~~strikethrough~~ text:

“To ensure no gaps in the consideration of available information, ***it is desired that*** the augmentations should be incorporated into the programmatic operating experience review activities ***as soon as practical following issuance of the renewed license, but in any case no later than entry into the period of extended operation*** ~~no later than the date the renewed license is issued~~ and then implemented on an ongoing basis

throughout the term of the renewed license. In this way, operating experience on age-related degradation can be used to inform the aging management activities currently being implemented or planned to be implemented in the future, and it can be used to determine when new activities are necessary.”

Additional locations where this language should be modified are on pages A-7 and A-11.

Comment 3

As noted above, after the TMI-1 accident in 1979 the commercial nuclear industry developed operating experience review programs to share and apply lessons learned across the industry to enhance safety and minimize the occurrence of events. As noted in the GALL, SRP-LR and elsewhere, plant and industry-wide operating experience is also used in the context of license renewal to strengthen aging management practices and programs. Many recent cases of operating experience have been embedded in the latest version of GALL (Revision 2) for use by current and future license renewal applicants in establishing robust aging management programs. To communicate the existence of and expectations associated with GALL Revision 2; the NRC recently issued RIS 2011-05, “Information on Revision 2 to the Generic Aging Lessons Learned Report for License Renewal of Nuclear Power Plants”.

Updated Draft LR-ISG-2011-05 now suggests that license renewal applicants should further enhance their operating experience review programs by requiring the programs to seek out “guidance documents and other publications when they contain lessons learned applicable to aging management” (See bottom of page A-9).

Exelon believes that other enhancements contained in updated Draft LR-ISG-2011-05 (treating aging management program activities as operating experience, establishing trend coding, training, sharing aging related OE with industry, etc.) provide sufficient assurance that stations with renewed operating licenses will appropriately consider operating experience in managing the effects of aging. In addition, we believe that products defined within the established NRC Generic Communications Program (i.e., NRC Bulletins, Generic Letters, Information Notices and Regulatory Information Summaries (RIS)) are appropriate vehicles to highlight information identified by the NRC related to aging management that should be considered by licensees. However, Exelon does not agree that guidance documents (NUREGs and other documents), which are produced and used for many purposes, merit a license renewal requirement to establish “written plans and expectations for finding this type of document and processing it as operating experience,” as indicated in the draft ISG.

Proposed Resolution

Reduce the scope of the enhancement described in the second bullet on page A-6 (and elsewhere in the document) to focus on NRC Generic Communications as described above. We believe it was fully appropriate for the NRC to communicate via RIS 2011-05 that GALL Revision 2 had been issued and encourage the NRC to continue using the RIS process in the future to communicate future information that could improve aging management of SSCs in the scope of license renewal.

Comment 4

On page A-6, third bullet, the first sentence states "Evaluations of **all** (emphasis added) plant-specific and industry operating experience include assessments of potential aging management impacts."

Proposed Resolution

It is recommended that the word "all" be eliminated from the sentence, or a clarification be provided to include a screening step. Although much of the plant specific and industry operating experience that is reviewed within the program does involve plant hardware failure or degradation, there are many cases where information shared and evaluated involves things such as human performance issues (e.g., component mis-positioning, Fitness for Duty program issues, etc.) that provide valuable lessons learned but do not potentially involve aging of SSCs within the scope of license renewal:

Comment 5

There are several instances where we believe that the proposed guidance is too prescriptive, containing information beyond what is needed to understand the proposed enhancements, sometimes specifying methods of implementation that should be left to the licensees or applicants. For example:

1. The third bullet on page A-6 appears to specify that on an ongoing basis, each case of plant specific and industry operating experience (OE) be subjected to an aging management review similar to what is done during the license renewal application process. This guidance should be simplified to focus on a more practical expected outcome for the OE reviews.
2. The fifth bullet on page A-6 provides detailed expectations related to training of personnel involved with review of aging-related operating experience. This guidance should be simplified, focusing on the objectives of the training.

Proposed Resolution

Proposed resolutions for the items identified above are as follows:

1. The third bullet on page A-6 could be revised to read: "Evaluation of plant specific and industry operating experience 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 existing AMPs or the need for new AMPs. The evaluations should be broad in nature, considering extent of condition and not limited in scope to specific systems or component types.” The final sentence of this third bullet on page A-6 regarding the establishment of criteria for revising AMPs or developing new AMPs is not needed, as the site corrective action process would address these aspects. Note that the first full bullet on page A-10 is also affected by this comment.

2. The fifth bullet on page A-6 could be replaced with the following: “Training on aging management is provided to those plant personnel who screen, assign, evaluate, and submit plant-specific and industry operating experience information. In general, the level of training should be commensurate with the overall responsibilities for implementing the aging management activities. When a committee or panel is used to screen operating experience, at least one member should have received appropriate training on aging management.” The corresponding bullet on page A-10 is also affected by this comment.

Comment 6

On page A-9, the overall content of the first bullet should be made more consistent with the first sentence, focusing on not excluding information on license renewal SSCs or AMPs.

Proposed Resolution

The second sentence of the first bullet on page A-9 could be revised to read: “For example, the processes do not exclude information on license renewal structures and components identified in the integrated plant assessment...” Similarly, the last sentence could be revised to read: “In addition, the processes do not exclude the AMPs credited for...”

Comment 7

The last five lines in the fourth bulleted item on page A-6 appear to suggest some required action beyond retaining the results of AMP-related testing or inspection that meets the acceptance criteria. The text currently reads: “...when applicable acceptance criteria are met, results are retained for future use and evaluation to determine whether it is necessary 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.”

Proposed Resolution

It is suggested that this last portion of this bulleted item be simplified to read: “...when acceptance criteria are met, results are retained for potential future use.”