

December 9, 2013

MEMORANDUM TO: Stephen D. Dingbaum
Assistant Inspector General for Audits
Office of the Inspector General

FROM: Michael R. Johnson **/RA/**
Deputy Executive Director for Reactor
and Preparedness Programs
Office of the Executive Director of Operations

SUBJECT: STAFF RESPONSE TO THE AUDIT OF U.S. NUCLEAR
REGULATORY COMMISSION'S OVERSIGHT OF ACTIVE
COMPONENT AGING (OIG-14-A-02)

Your report dated October 28, 2013, entitled "Audit of NRC's Oversight of Active Component Aging (OIG-14-A-02)," includes the staff's formal comments of the original draft audit. These formal comments were transmitted in a memorandum dated September 27, 2013, and are listed as Appendix B to OIG-14-A-02. You responded to these formal comments in Appendix C to OIG-14-A-02. The staff has reviewed the audit report, including your responses to the staff's formal comments.

This audit report contains two recommendations that request additional actions by the staff in response to the findings of the audit.

Recommendation 1:

This recommendation states that the Executive Director for Operations (EDO) should:

Perform and document a thorough and systematic evaluation of the need for an NRC program to oversee the management of active component aging activities, all within the context of the current Reactor Oversight Program (ROP) environment. Evaluation elements are to include, but should be limited to, the need for:

- (a) program policies, goals, and objectives, and
- (b) program feedback and corrective actions for continual improvement.

The ROP provides a framework for ensuring that both active and passive aging issues with the potential to impact safety are addressed in a timely manner. This framework provides assurance that the U.S. Nuclear Regulatory Commission (NRC) will identify safety-significant,

CONTACT: John W. Thompson, NRR/DIRS
301-415-1011

age-related failures of active components. Further, the NRC has processes in place to systematically evaluate the results of the ROP, along with several other data sources. The staff considers the intent of your recommendation is already met by the current program. A more detailed discussion underpinning the staff's position is provided in the staff's September 27, 2013, memorandum (Appendix B to OIG-14-A-02).

Recommendation 2:

This recommendation states that the EDO should, "...develop and incorporate the mechanisms for monitoring, collecting, and trending age-related data for active components within NRC policy and procedures."

As previously stated and discussed in greater detail in our September 27, 2013, memorandum, the staff collects or has access to operating experience data gathered from reportable events, international events, industry failure data, and inspection findings. This data is routinely screened for significance and trending and analysis, regardless of cause. The staff considers the intent of your recommendation is already met by the current program.

If you have any questions or concerns, please have your staff contact John Thompson at (301) 415-1011.

cc: Chairman Macfarlane
Commissioner Svinicki
Commissioner Apostolakis
Commissioner Magwood
Commissioner Ostendorff
SECY

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 Commissioner Magwood
 Commissioner Ostendorff
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ADAMS Accession No.: pkg.: ML13310A210, memo: ML13310A296

*e-mail concurrence

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