

Analysis of Public Comments on Draft Regulatory Issue Summary 201X-XX, “Maintaining the Effectiveness of License Renewal Aging Management Programs”

Introduction

Comments on this draft Regulatory Issue Summary (RIS) are available electronically at the Nuclear Regulatory Commission (NRC)'s electronic Reading Room at <http://www.nrc.gov/reading-rm/adams.html>. From this page, the public can gain entry into the NRC's Agencywide Documents Access and Management System (ADAMS), which provides text and image files of NRC's public documents. The NRC received comments from the Nuclear Energy Institute (NEI), which is a nuclear industry group. The NEI submitted its comments by letter dated February 18, 2014, which is available in the NRC's ADAMS under Accession Number ML14055A366. No other comments were received. Overall, NEI indicated that the nuclear industry supports the RIS. NEI also provided some suggested changes to the document in the form of a mark-up. The following analysis addresses these suggested changes. The NRC has summarized the NEI's comments for conciseness and clarity.

NRC Analysis of Public Comments

Comment: On page 2 of the draft RIS, NEI proposed to add the words “as a minimum” to the discussion regarding which systems, structures, and components (SSCs) are subject to the quality assurance criteria of Appendix B to Title 10 of the Code of Federal Regulations (10 CFR) Part 50, “Domestic Licensing of Production and Utilization Facilities.” Per this proposal, the discussion would state that certain criteria in 10 CFR Part 50, Appendix B, apply “as a minimum” only to safety-related SSCs.

NRC Response: The NRC disagrees with this suggestion. Although the NRC's regulations represent the minimum standards to which licensees must adhere to ensure the safe operation of their plants, and licensees may choose to go above and beyond these standards, the intent of the subject discussion is to summarize the requirements of 10 CFR Part 50, Appendix B, by stating the type of SSCs to which these requirements apply. Specifically, 10 CFR Part 50, Appendix B, only requires application of the quality assurance program to safety-related SSCs. Absent some other obligation, the NRC does not require licensees to implement the provisions of 10 CFR Part 50, Appendix B, for any other type of SSC. The NRC believes that the language in the draft RIS is a more direct and concise way of stating this applicability and, therefore, disagrees with the additional language proposed by the NEI.

Comment: On page 3 of the draft RIS, NEI proposed in two locations to state that renewed license holders are only required to implement their license renewal aging management programs and activities in the “period of extended operation,” instead of “upon their receipt of renewed licenses,” or more simply “post-renewal.”

NRC Response: The NRC disagrees with this suggestion. Conditions included as part of a renewed license or statements included in the final safety analysis report (FSAR) can change the effective dates of specific aging management programs and activities, including those activities for accomplishing the corrective actions, confirmation process, and administrative controls aspects of aging management under certain portions of the licensee's quality assurance program. Such license conditions and statements in the FSAR can change the implementation date to the period of extended operation or some other time. However, in accordance with 10 CFR 54.31, a renewed license supersedes the operating license previously in effect and becomes effective immediately upon issuance. Therefore, in the absence of such a license condition or specific implementation date stated in the FSAR, the aging management program or activity becomes immediately effective upon issuance of the renewed license. As such, renewed license holders must determine the implementation schedule for a given program or activity based on the plant-specific current licensing basis. To capture these plant-specific aspects of implementation, the NRC will indicate in the RIS that the aging management programs and activities become effective upon the issuance of the renewed license or upon any specific effective date stated in the renewed license or FSAR.

Comment: On page 3 of the draft RIS, NEI proposed alternate text to indicate that the bulleted descriptions of the corrective actions, confirmation process, and administrative controls elements of aging management only represent a summary.

NRC Response: The NRC agrees with this suggestion. Appendix A.1 of NUREG-1800, Revision 2, "Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants," dated December 2010, which is available in the NRC's ADAMS under Accession Number ML103490036, provides the full descriptions of these three elements.

Comment: On page 4 of the draft RIS, NEI proposed to add the words "specific sections" to indicate that only certain parts of a renewed license holder's 10 CFR Part 50, Appendix B, quality assurance program are invoked for SSCs subject to aging management.

NRC Response: The NRC agrees with this suggestion in part. All current holders of renewed licenses have addressed the quality assurance aspects of aging management by crediting only those parts of their quality assurance programs that implement Criterion VI, "Document Control," and Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. However, because a licensee's quality assurance program may not address these criteria under specific sections, the NRC will use "specific portions" as a more general phrase to address the intent of this comment.

Comment: On page 4 of the draft RIS, NEI proposed to replace "more stringent" with "more effective" to describe changes to inspection methods that may be needed as part of corrective actions for maintaining the effectiveness of aging management programs and activities.

NRC Response: The NRC disagrees with this suggestion. Although the ultimate objective of any corrective action would be to re-establish activities that effectively manage the effects of

aging, the examples listed in this discussion are intended to highlight possible changes to aging management activities that go beyond the ones previously employed by the licensee. For example, the nature of an aging mechanism at a specific location may warrant VT-1 inspections instead of VT-3 inspections, because a VT-1 inspection would yield more detailed information about the specific location. After further consideration, the NRC has decided to use “more rigorous” in the RIS to capture this concept.

Comment: On page 5 of the draft RIS, NEI proposed to add several additional words to indicate that only portions of the corrective actions and document control provisions of the quality assurance program apply to the SSCs subject to aging management.

NRC Response: The NRC disagrees with this suggestion. The additional words proposed by the NEI would suggest that only partial implementation of the corrective actions and document control aspects of the quality assurance program are needed for license renewal. However, full implementation of both these aspects of the quality assurance program is needed to satisfy the requirements of 10 CFR Part 50, Appendix B, and the specific quality assurance commitments incorporated into the FSARs of current renewed license holders. The corrective actions and document control aspects of the quality assurance program apply to safety-related and nonsafety-related SSCs subject to aging management. Applicability to these SSCs also fulfills the corrective actions, confirmation process, and administrative controls elements for the aging management programs.