



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
WASHINGTON, D.C. 20555-0001

OFFICE OF THE
INSPECTOR GENERAL

July 23, 2014

MEMORANDUM TO: Chairman Macfarlane

FROM: Hubert T. Bell */RA/*
Inspector General

SUBJECT: ACTION REQUEST ON AUDIT OF NRC'S OVERSIGHT OF
ACTIVE COMPONENT AGING (OIG-14-A-02)
RECOMMENDATIONS

In accordance with [Management Directive 6.1, Resolution and Followup of Audit Recommendations](#), this memorandum requests that you take the action necessary to ensure that the agency implements the recommendations contained in the Office of the Inspector General (OIG) report, *Audit of NRC's Oversight of Active Component Aging (OIG-14-A-02)* issued on October 28, 2013. As part of the recommendation follow-up process, the agency's May 14, 2014, correspondence to OIG ([ML14127A157](#)) reflects an overall misunderstanding and misinterpretation of the report content, and therefore erroneously concludes that the audit recommendations are irrelevant. Management Directive 6.1 states that the Chairman will resolve differences between the EDO and OIG with regard to recommendations in audit reports.

The Issue

Active component degradation in aging plants is a phenomenon that will not likely decrease over time. The [audit report](#) acknowledges that the agency has developed programs for the oversight of passive component aging, in particular via the License Renewal program and associated inspection and audit activity. In the mid-1990s, the agency, on the basis of detailed analyses, opted to not include active components in the License Renewal program. However, the Reactor Oversight Program (ROP) has been implemented since that time. Senior agency managers continue to insist that the ROP is sufficient for oversight of active components, and OIG acknowledges that these managers may be correct. Yet, management's claims are not based on any rigorous study or evidence to demonstrate that the assumptions regarding NRC's oversight of active component aging in the pre-ROP era remains valid today. In fact, agency staff are not uniformly in agreement with management on this topic, and the audit report

provided additional evidence that inspectors face challenges in applying the Maintenance Rule and Part 50, Appendix B in their efforts to oversee active components. Whether this is due to insufficient training and experience or to impacts the ROP may have had in how these (and other) regulations may be applied to active component aging oversight is, without a rigorous evaluation, sheer speculation on anybody's part.

I urge you to take the necessary steps to ensure the agency implements the report recommendations related to conducting a thorough analysis of the active component aging oversight program within the ROP context and formalizing the agency's monitoring and trending of active component age-related failures.

We are confident that NRC values the audit process and respectfully asks that your office address this matter as soon as possible.

If you have questions or concerns, please call me at 415-5930 or Steve Dingbaum at 415-5915.

cc: Commissioner Svinicki
Commissioner Magwood
Commissioner Ostendorff
EDO