

**Recommendations from NRR/IOEB Study on Components Exceeding Recommended Service Life
- Planned Actions and Current Status -**

	2012 Active Component Failure Study Recommendations	Planned/Completed Actions	Status
1	Issue an Operating Experience (OpE) COMMunication describing the study findings and recommendations.	OpE COMMunication issued in June 2012. OpE COMMunications are distributed to NRC staff only.	Complete
2	Present study findings and recommendations to the Office of Nuclear Regulation (NRR) Executive Team in a "Significant Topics" briefing.	Briefed the NRR Executive Team in November 2012.	Complete
3	Consider issuing a generic communication to alert the industry that operating important-to-safety equipment beyond its qualified service life without adequate justification is contrary to regulatory requirements and NRC expectations.	The staff is developing the basis for a NRC generic communication, most likely a Regulatory Information Summary (RIS). This basis will be finalized upon completion of a "concurrence" Task Interface Agreement (TIA) on a closely-related issue identified at three NRC Region 3 plants involving continued licensee operation of safety-related relays beyond their service life. The draft TIA and its implications were briefly mentioned at the Nov, 2014 bimonthly Reactor Oversight Process Working Group meeting. The final TIA will be posted on the external NRC website. The RIS will then be processed.	Jan 2015 (TIA) Jan 2016 (RIS)
4	Consider how inspectors could be better prepared to identify instances in which licensees are operating systems, structures and components (SSCs) important-to-safety beyond their reasonable expected service life without an adequate engineering justification. Additional guidance and training could be used to alert more inspectors on how these issues can be pursued using 10 CFR Part 50 Appendix B (Quality Assurance) criteria.	Revise selected Inspection Procedures (e.g., Inspection Manual Chapter 0612) and conduct associated inspector seminars. Seminars may be delivered using telecommunications and/or through the semi-annual resident inspector counterpart meetings.	Oct 2015 (procedures) Jan 2016 (seminars)
5	Brief the NRC regional office branch chiefs responsible for Component Design Basis Inspections (CDBIs) and the regional OpE points of contact to alert them of the findings of this study.	Several regional office managers were briefed in November 2012. An updated briefing was conducted on November 3, 2014, for the four regional branch chiefs responsible for CDBIs (and their respective division directors) to clarify planned actions and to solicit additional comments.	Complete
6	Conduct a Temporary Instruction (TI) (i.e., one-time inspection) to evaluate whether licensees are documenting appropriate engineering justifications for SSCs in service beyond qualified service life. Results may inform further staff actions, such as enhancements to the baseline inspection program.	The staff will make a decision on whether there is a need for a TI to collect data about licensees' management of component service life. This decision will be based in part on NRC/industry dialogue following development of a Generic Communication and our analysis of any follow-on initiatives proposed by industry.	Decision by Feb 2015
7	Consider engaging industry to propose a revision to NRC Regulatory Guide 1.160 ("Maintenance Rule" guidance) and NUMARC 93-01 to increase discussion of the validity of time-based (periodic refurbishment/replacement) preventive maintenance and/or life cycle management.	Industry representatives were briefed regarding the need for additional regulatory guidance and industry attention to this issue. This will naturally occur as a consequence of the other planned activities as described in response to Recommendations 3 and 6 above.	Complete