



OFFICE OF THE  
INSPECTOR GENERAL

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

January 14, 2015

MEMORANDUM TO: Mark A. Satorius  
Executive Director for Operations

FROM: Stephen D. Dingbaum */RA/*  
Assistant Inspector General for Audits

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

REFERENCE: EXECUTIVE DIRECTOR FOR OPERATIONS  
MEMORANDUM DATED DECEMBER 15, 2014

Attached is the Office of the Inspector General's analysis and status of recommendations 1 and 2 discussed in the agency's response dated December 15, 2014. Based on OIG's analysis of this response, recommendations 1 and 2 are resolved.

Please provide an updated status of the resolved recommendations by June 19, 2015. If you have questions or concerns, please call me at 415-5915, or R.K. Wild, Team Leader, at 415-5948.

Attachment: As stated

cc: M. Galloway, OEDO  
K. Brock, OEDO  
J. Arildsen, OEDO  
W. Dean, NRR  
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## Audit Report

### AUDIT OF NRC'S OVERSIGHT OF ACTIVE COMPONENT AGING

#### OIG-14-A-02

#### Status of Recommendations

Recommendation 1: 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 ROP environment. Evaluation elements are to include, but should not be limited to, the need for:

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

Agency Response Dated  
December 15, 2014:

The staff will complete the recommendations from the Office of Nuclear Reactor Regulation (NRR), Operating Experience Branch's (IOEB) Study on Components Exceeding Recommended Service Life. This study's recommendations, the plan for accomplishing the recommendations, and the current status on the completion of the actions addressing the recommendations are provided as a table in Enclosure 2.

OIG Analysis:

The agency's proposed actions to complete the actions associated with the *IOEB Study* recommendations in [Enclosure 2](#) meet the intent of the OIG recommendation. OIG notes that the agency's planned/completed actions to address *IOEB Study* Recommendations 1, 2, 5, and 7 are complete. OIG will continue to monitor the agency's planned/completed actions for *IOEB Study* Recommendations 3, 4, and 6, including

1. Development of a basis for a generic communication, such as a Regulatory Information Summary (RIS), pending the outcome of the Task Interface Agreement (TIA) identified in Enclosure 2.

## **Audit Report**

### **AUDIT OF NRC'S OVERSIGHT OF ACTIVE COMPONENT AGING**

**OIG-14-A-02**

#### **Status of Recommendations**

Recommendation 1 (cont.):

2. Revising applicable Inspection Manual Chapters (IMC) and Inspection Procedures (IP). During discussions between agency staff and managers and OIG, the agency stated that IMC 0612, Appendix E, would be modified to incorporate an example to convey that equipment found to be beyond its service life should be considered more-than-minor during inspection issue screening.
3. Implement the proposed Temporary Instruction (TI) to evaluate whether licensees are documenting appropriate engineering justifications for active components in service beyond qualified service life.

**Status:** Resolved.

## Audit Report

### AUDIT OF NRC'S OVERSIGHT OF ACTIVE COMPONENT AGING

OIG-14-A-02

#### Status of Recommendations

Recommendation 2: Develop and incorporate the mechanisms for monitoring, collecting, and trending age-related data for active components within NRC policy and procedures.

Agency Response Dated  
December 15, 2014:

The staff will monitor and trend selected system and/or component failure information, using an existing, quarterly data source that typically includes an average of 1000 event entries. NRC staff will use this data to establish a threshold for further review, and when a threshold is exceeded, NRC staff will perform a focused analysis of the variance.

OIG Analysis:

The agency's action partially meets the intent of the recommendation. OIG will close the recommendation upon agency development of and OIG review of guidance the staff develops to address the recommendation to include a handbook, office instruction, or similar guidance document to provide direction and permanency to trending of age-related failures. Closure will also be based on OIG review of the results of the agency's trending reviews. The handbook/office instruction should include language to the effect that the data will be reviewed to identify age-related failures.

**Status:** Resolved.