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To: [Thompson, John](#)
Cc: [Treadway, Ryan I](#); [Zimmerman, Tony](#)
Subject: [External_Sender] RIS on Service Life
Date: Thursday, January 28, 2016 12:03:21 PM

John,

I was reviewing the draft RIS titled NRC DRAFT REGULATORY ISSUE SUMMARY YYYY-#####: DISPOSITION OF INFORMATION RELATED TO THE TIME PERIOD THAT SAFETY-RELATED STRUCTURES,

SYSTEMS OR COMPONENTS ARE INSTALLED from the January 20th meeting. I agree that a licensee has a responsibility to evaluate service/qualification life extensions beyond the vendor recommended life, that the licensee should know what the service/qualification life is if it is stated in vendor documentation provided to the licensee, and that these life/qualification periods of time should be incorporated in PM programs. I noticed that there is no discussion or responsibility assigned to vendors when a vendor issues new service/qualification lives for equipment they have already sold to licensees. If a vendor sells a licensee a component without a defined service life, and later determines that it is necessary to document a service life or revise a service life in a technical bulletin or technical manual change, it seems that there should be an obligation of the vendor to the purchaser to clearly call out this new service life and the basis for it in a letter to the licensee. I am not sure that in any or all cases this change would constitute a Part 21 notification to the NRC. However, changes in service/qualification life needs to be something that is not obscurely hidden in a vendor technical manual change. I think addressing this situation in the RIS would help industry during NUPIC audits of vendors, and for the NRC Vendor Inspection Branch, in reviewing new life determination/reduction situations during the required vendor QA program implementation reviews.

Thanks,

Joe

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