

## **Discussion Topics on the Protective Coating Monitoring and Maintenance Aging Management Program for the River Bend License Renewal**

### Background:

10 CFR § 54.21(a)(3) of 10 CFR requires an applicant to demonstrate that the effects of aging for structures and components will be adequately managed so that the intended function(s) will be maintained consistent with the current licensing basis for the period of extended operation. One of the findings that the staff must make to issue a renewed license (10 CFR § 54.29(a)) is that actions have been identified and have been or will be taken with respect to the managing the effects of aging during the period of extended operation on the functionality of structures and components that have been identified to require review under § 54.21, such that there is reasonable assurance that the activities authorized by the renewed license will continue to be conducted in accordance with the current licensing basis (CLB). As described in SRP LR, an applicant may demonstrate compliance with 10 CFR 54.21(a)(3) by referencing the GALL Report. In order to complete its review and enable making a finding under 10 CFR § 54.29(a), the staff requires additional information in regard to the matters described below.

10 CFR 54.21(d) states, “[t]he FSAR supplement for the facility must contain a summary description of the programs and activities for managing the effects of aging...”

LRA Section A.1.35, “Protective Coating Monitoring and Maintenance,” does not state that the Program is implemented in accordance with the latest revision of Regulatory Guide (RG) 1.54.

SRP-LR Table 3.0-1, “FSAR Supplement for Aging Management of Applicable Systems,” for AMP XI.S8 recommends that the USAR supplement include a statement about implementation of the program in accordance with RG 1.54, Rev. 1 or latest revision.

### Issue:

The licensing basis for this program for the period of extended operation will not be consistent with staff-issued guidance documents if the USAR supplement does not include a statement about implementation of the program in accordance with RG 1.54, Rev. 1 or latest revision.

The staff cannot complete its review of the Protective Coating Monitoring and Maintenance Program USAR supplement without additional information or reviewing the changes to LRA Section A.1.35 necessary to address whether the Program is consistent with the latest revision of RG 1.54.

### Request:

State the basis for why LRA Section A.1.35 does not cite implementation in accordance with RG 1.54. Alternatively, what are the changes that will be incorporated into LRA Section A.1.35 to include these requirements?