

Background

LR-ISG-2011-05, "Ongoing Review of Operating Experience," provides guidance on the review of operating experience during the period of extended operation. LR-ISG-2011-05, Appendix A describes the "Acceptable Use of Existing Programs," and also, "Areas of Further Review."

Appendix A notes in "Areas of Further Review:"

"The programmatic activities for the ongoing review of plant-specific and industry experience concerning age-related degradation and aging management should be described in the license renewal application, including the FSAR supplement," and

"Alternate approaches for the future consideration of operating experience are subject to NRC review on a case-by-case basis."

Issue

The license renewal application (LRA) should address the information contained in the ISG, including the "Acceptable Use of Existing Programs," and, "Areas for Further Review," whether the guidance is followed or an alternative approach is presented for the staff's review.

The staff's determined that LRA, Appendix B, Section 5.0.4, addressed the guidance contained in LR-ISG-2011-05, Appendix A, "Acceptable Use of Existing Programs."

However, the staff did not determine that the LRA addressed the following items of LR-ISG-2011-05, Appendix A, "Areas of Further Review," or provided an alternative approach:

- All revisions to NUREG-1801, "Generic Aging Lessons Learned (GALL) Report," should be considered as a source of operating experience and evaluated accordingly. NRC and industry guidance documents and standards applicable to aging management also should be considered as sources of operating experience. There should be written plans and expectations for identifying such documents and processing them as operating experience.
- All incoming plant-specific and industry operating experience should be screened to determine whether it may involve age related degradation or impacts to aging management activities.
- A specific identification code (i.e., "Aging") should be used in the corrective action program to identify operating experience concerning age-related degradation applicable to the plant. A definition should be provided so that this code can be assigned consistently by plant personnel. The entries associated with this code should be periodically reviewed to determine whether trending is necessary. Any adverse trend should be entered into the corrective action program for evaluation.

- Operating experience items identified as potentially involving aging should receive further evaluation. This evaluation should specifically take into account the following: (a) systems, structures, and components, (b) materials, (c) environments, (d) aging effects, (e) aging mechanisms, (f) AMPs, and (g) the activities, criteria, and evaluations integral to the elements of the AMPs. The assessment of this information should be recorded with the operating experience evaluation. If it is found through evaluation that any effects of aging may not be adequately managed, then a corrective action should be entered into the 10 CFR Part 50, Appendix B, program to either enhance the AMPs or develop and implement new AMPs
- The results of implementing each AMP (i.e., data from inspections, tests, analyses, etc.) should be evaluated to determine whether the effects of aging are adequately managed. These evaluations should be conducted regardless of whether the acceptance criteria of the particular AMP have been met. A determination is made as to whether the frequency of future inspections should be adjusted, whether new inspections should be established, and whether the inspection scope should be adjusted or expanded. If there is an indication that the effects of aging may not be adequately managed, then a corrective action is entered into the 10 CFR Part 50, Appendix B, program to either enhance the AMP or develop and implement new AMPs.
- Any enhancements necessary to fulfill the above criteria should be put in place no later than the date the renewed operating license is issued and implemented on an ongoing basis throughout the term of the renewed license.
- The programmatic activities for the ongoing review of plant-specific and industry experience concerning age-related degradation and aging management should be described in the license renewal application, including the FSAR supplement. Alternate approaches for the future consideration of operating experience are subject to NRC review on a case-by-case basis.

Staff Request

The staff requests that the applicant indicate how the guidance listed in the identified items of the LR-ISG-2011-05, Appendix A, "Areas of Further Review," (as listed above) is met by the applicant's operating experience program, as enhanced and documented in the USAR supplement, or provide an alternative approach for the staff's review.