

# DRAFT – UNCERTIFIED INFORMATION

## Question

“Operating Experience Program” Teleconference 05/24/2018

## Response

To clarify how the guidance listed in LR-ISG-2011-05, Appendix A, “Areas of Further Review,” is met by the RBS operating experience program, additional information is provided in LRA Appendix A, Updated Safety Analysis Report Supplement, Section A.1. LRA Section A.1 provides the USAR supplement summary description of the activities for ongoing review of the operating experience. On issuance of the renewed license, this summary description will be incorporated into the licensing basis.

The changes to LRA Appendix A, Section A.1 follow with additions underlined.

The integrated plant assessment for license renewal identified aging management programs necessary to provide reasonable assurance that structures and components subject to aging management review will continue to perform their intended functions consistent with the current licensing basis for the period of extended operation. This section describes the aging management programs and activities required during the period of extended operation. Aging management programs will be implemented prior to entering the period of extended operation.

The corrective action, confirmation process, and administrative controls of the RBS (10 CFR Part 50, Appendix B) Quality Assurance Program are applicable to all aging management programs and activities during the period of extended operation. RBS quality assurance (QA) procedures, review and approval processes, and administrative controls are implemented in accordance with the requirements of 10 CFR 50, Appendix B. The RBS Quality Assurance Program applies to safety-related and important to safety structures and components. Corrective actions and administrative (document) control for both safety-related and nonsafety-related structures and components are accomplished in accordance with the established RBS corrective action program and document control program and are applicable to all aging management programs and activities during the period of extended operation. The confirmation process is part of the corrective action program and includes reviews to assure adequacy of corrective actions, tracking and reporting of open corrective actions, and review of corrective action effectiveness. Any follow-up inspection required by the confirmation process is documented in accordance with the corrective action program.

Operating experience from plant-specific and industry sources is identified and systematically reviewed on an ongoing basis. The RBS corrective action program, which is implemented in accordance with the quality assurance program, effects the documentation and evaluation of plant-specific operating experience. The RBS operating experience program, which meets the provisions of NUREG-0737, "Clarification of TMI Action Plan Requirements," Item I.C.5, "Procedures for Feedback of Operating Experience to Plant Staff," systematically evaluates industry operating experience. The operating experience program includes active participation in the Institute of Nuclear Power Operations' operating experience program, as endorsed by the NRC.

Codes are used in the corrective action program that provide for the comprehensive identification and categorization of aging-specific issues for plant systems, structures, and components within the scope of license renewal.

In accordance with these programs, site-specific and industry operating experience items are screened to determine whether they involve lessons learned that may impact aging management programs (AMPs). Items are evaluated, and affected AMPs are either enhanced or new AMPs are developed, as appropriate, when it is determined that the effects of aging are not adequately managed. Plant-specific operating experience associated with managing the effects of aging is reported to the industry in accordance with guidelines established in the operating experience review program.

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The results of implementing aging management programs (e.g., data from inspections, tests, analyses) are evaluated to determine whether the effects of aging are adequately managed. These evaluations are 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. If the effects of aging are not being 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 aging management activities.

Training provided for personnel responsible for submitting, screening, assigning, evaluating, or otherwise processing plant-specific and industry operating experience, as well as for personnel responsible for implementing AMPs, is based on the complexity of the job performance requirements and assigned responsibilities. Training is scheduled on a recurring basis, which accommodates the turnover of plant personnel and the need for new training content.

Revisions to NUREG-1801, "Generic Aging Lessons Learned (GALL) Report" are developed to incorporate lessons learned from LRA reviews and from relevant industry operating experience. For Revision 2, NRC staff reviewed industry operating experience for the period from January 2004 to approximately April 2009 to identify recommended modifications to the GALL Report. The staff from the Division of License Renewal (DLR) analyzed operating experience information during a screening review of domestic operating experience, foreign operating experience from the international Incident Reporting System database, and NRC generic communications. The operating experience review program at RBS includes review of operating experience from the same domestic and foreign sources and from NRC generic communications. Thus, the RBS operating experience review program includes the review of operating experience documented within each revision of NUREG-1801.

Evaluation of operating experience related to managing the effects of aging includes the consideration of affected plant systems, structures, and components; materials; environments; aging effects, aging mechanisms; aging management programs (AMPs); and the activities, criteria, and evaluations integral to the aging management programs.

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