

## **NRR-DMPSPEm Resource**

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**From:** Wong, Albert  
**Sent:** Wednesday, May 30, 2018 4:55 PM  
**To:** Mr. William F. Maguire  
**Cc:** RidsNrrDmlr Resource; RidsNrrDmlrMrpb Resource; RidsNrrPMRiverBend Resource; RidsOgcMailCenter Resource; Wilson, George; Donoghue, Joseph; Sayoc, Emmanuel; Wong, Albert; Rogers, Bill; Oesterle, Eric; Alley, David; Martinez Navedo, Tania; Bailey, Stewart; Wittick, Brian; Ruffin, Steve; Bloom, Steven; Regner, Lisa; Turk, Sherwin; Sowa, Jeffrey; Parks, Brian; Pick, Greg; Kozal, Jason; Young, Cale; Young, Matt; Werner, Greg; McIntyre, David; Dricks, Victor; Moreno, Angel; Burnell, Scott; 'Broussard, Thomas Ray'; Lach, David J; SCHENK, TIMOTHY A; 'Coates, Alyson'; Pereira, Dennis  
**Subject:** SUMMARY OF A TELEPHONE CONFERENCE CALL HELD ON MAY 21, 2018, BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND ENTERGY REGARDING THE NEED FOR ADDITIONAL INFORMATION TO SUPPORT THE RIVER BEND STATION LICENSE RENEWAL APPLICATION (CAC NO. MF9757)  
**Attachments:** Enclosure1 - List of May 21, 2018 Clarification Call Participants.pdf; Enclosure2 - RAI discussed during the 052118 Clarification Call.pdf

Docket No. 50-458

Dear Mr. Maguire:

The U.S. Nuclear Regulatory Commission (NRC or the staff) and representatives of Entergy Operations, Inc. (the applicant) held a tele-conference call on May 21, 2018, to discuss an issue related to operating experience that recently had risen from staff's review of the River Bend Station, Unit 1 license renewal application. The conference call was held to facilitate efficiency in staff's review by ensuring that the applicant understood the staff's concerns and that those concerns were appropriately addressed in the final responses.

The conference call participants are listed in Enclosure 1. Enclosure 2 presents staff's concerns in the form of a Request for Additional Information (RAI), and the resolution of the discussions. Mr. David Lach of your staff agreed to prepare a draft response to be further discussed with the NRC staff in a future public meeting scheduled in late May 2018. The public meeting has since been canceled because the applicant provided additional information (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18149A638) on this topic to obviate the need of issuing a formal RAI. The NRC staff will place a copy this e-mail in the NRC ADAMS.

Sincerely,

Emmanuel Sayoc, Project Manager *Albert Wong for*  
License Renewal Projects Branch (MRPB)  
Division of Materials and License Renewal  
Office of Nuclear Reactor Regulation

Docket No. 50-458

Enclosures:  
As stated

OFFICE	PM:MRPB:DMLR	BC: MRPB:DMLR	PM: MRPB:DMLR
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DATE	05/24/2018	05/30/2018	05/30/2018

**OFFICIAL RECORD COPY**

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**Subject:** SUMMARY OF A TELEPHONE CONFERENCE CALL HELD ON MAY 21, 2018, BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND ENTERGY REGARDING THE NEED FOR ADDITIONAL INFORMATION TO SUPPORT THE RIVER BEND STATION LICENSE RENEWAL APPLICATION (CAC NO. MF9757)

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**Received Date:** 5/30/2018 4:55:32 PM

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**Post Office:** BN7PR09MB2914.namprd09.prod.outlook.com

Files	Size	Date & Time	
MESSAGE	1685	5/30/2018 4:55:32 PM	
Enclosure1 - List of May 21, 2018 Clarification Call Participants.pdf			58251
Enclosure2 - RAI discussed during the 052118 Clarification Call.pdf			93903

**Options**  
**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**

ENCLOSURE 1 - LIST OF PARTICIPANTS FOR THE MAY 17, 2018 TELEPHONE  
CONFERENCE CALL

PARTICIPANTS	AFFILIATIONS
Eric Oesterle	U.S. Nuclear Regulatory Commission (NRC)
Billy Rogers	NRC
Emmanuel Sayoc	NRC
Albert Wong	NRC
Garry Young	Entergy Nuclear Operations Inc. (Entergy)
David Lach	Entergy
Alan Cox	Entergy
Herbert Rideout	Entergy
Steve McKissack	Entergy
Lori Potts	Entergy
Mark Spinelli	Entergy
Heidi Cannon	Entergy
Jim Morgan	Entergy
Lisa Borel	Entergy

## ENCLOSURE 2 - THE OPERATING EXPERIENCE RAI DISCUSSED DURING THE MAY 21, 2018 TELEPHONE CONFERENCE CALL AND ITS RESOLUTION

The following draft RAI was discussed with the applicant during the call. The resolution is summarized in the parentheses.

### **Draft RAI 3-0-5 Operating Experience**

The staff's draft RAI 3-0-5, dated May 23, 2018 can be found in ADAMS Accession No. ML18143B686.

### **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.

**(Resolution: The applicant stated that they understood staff's concerns, and would provide a draft response to the staff to be discussed in a public telephone call scheduled in late May 2018.)**