



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

February 23, 2012

Mr. Ken Langdon
Site Vice President
Nine Mile Point Nuclear Station, Unit 1
Constellation Energy, LLC
P.O. Box 63
Lycoming, NY 13093

SUBJECT: AGING MANAGEMENT PROGRAMS AUDIT AT THE NINE MILE POINT
NUCLEAR STATION, UNIT 1 (TAC NO. ME6075)

Dear Mr. Landon:

On October 31, 2006, the Nine Mile Point Nuclear Station, Unit 1 (NMP1), was granted a renewed operating license to operate an additional twenty years from August 22, 2009, to August 22, 2029. On November 1-3, 2011, the U.S. Nuclear Regulatory Commission visited NMP1 to review the implementation of its aging management programs for license renewal since NMP1 entered the period of extended operation. The summary of the audit is enclosed.

If you have any questions, please contact me by telephone at 301-415-2981 or by e-mail at bennett.brady@nrc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Bennett M. Brady".

Bennett M. Brady, Sr. Project Manager
Program Operations Branch
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket No. 50-220

Enclosure:
As stated

cc w/encl: Listserv

SUMMARY OF AGING MANAGEMENT PROGRAMS AUDIT AT THE NINE MILE POINT NUCLEAR POWER STATION

I. Summary

During the week of November 1 – 3, 2011, the U.S. Nuclear Regulatory Commission (NRC) staff performed an audit of aging management programs (AMPs) at the Constellation Energy, LLC's, Nine Mile Point Nuclear Station, Unit 1 (NMP1). The purpose of the audit was to review the implementation of AMPs that had been reviewed by the NRC during NMP1's application for license renewal. NMP1 entered its period of extended operation on September 19, 2009. The audit was performed at the NMP1 facility located in the Town of Scriba, New York. The primary focus of the staff's audit was a sample review of the implementation results of the AMPs and the licensee's assessment of the AMPs.

The information collected from this audit and from similar audits of other plants in their period of extended operation will be used by the NRC in assessing the technical and regulatory needs for subsequent license renewal reviews.

Prior to the audit, Constellation Energy set up a portal on the Internet and provided the NRC staff Web access to the portal. The staff examined the license renewal application for NMP1, the staff's Safety Evaluation Report, the Program Basis Document for each AMP, and NMP1's self-assessment of the AMPs which were available on the portal. During the audit, the staff further examined the implementing procedure documents which the AMPs put into practice, the condition reports, and work orders related to each AMP. The staff interviewed AMP owners and staff responsible for the implementation of each of the AMPs.

The NRC staff also reviewed the changes that have been made to the commitments the licensee made during the license renewal review process. Changes to these commitments are allowed under Title 10 of the *Code of Federal Regulation* (CFR) 50.59 if such changes meet criteria as specified in 10 CFR 50.59(c)(2).

A final briefing was held with the licensee on November 3, 2011, to discuss the preliminary findings of the audit. The audit team provided general observations regarding the licensee's implementation of the AMPs:

- The AMPs at NMP1, as approved through the license renewal application review, have been updated at least once prior to beginning the period of extended operation, and have been translated into a large number of implementing procedures.
- AMP owners were generally knowledgeable about their specific programs and the documentation required for implementation of each program. However, some of the AMP owners were relatively new and managed multiple AMPs.
- Controls were in place to maintain documentation, such as procedures that are "hardened" so that those specifically associated with license renewal can't be changed without approval from the Program Owner or License Renewal Program Manager.
- NMP1 had done its own self-assessment of the implementation of a sample of its license renewal AMPs.

- Plant personal were trained in identifying aging. Checklists were included with procedures to verify that aging was or was not occurring.

In trying to gain an understanding of how AMPs have changed since implementation and any aging related issues that may have led to such changes, the staff was not able to easily trace the issues in condition reports or the licensee's Corrective Action Program, as aging degradation was not specifically singled out as a category. The staff also felt that the licensee should work to maintain knowledge of the history and evolution of its AMPs to insure that a culture of actively seeking and managing aging will be maintained.

II. Major Documents Reviewed

- a. License Renewal Program Basis Documents for all AMPs
- b. Inspection Procedures for all AMPs
- c. 10 CFR 50.59 Evaluations
- d. Selected Condition Reports
- e. Updated Final Safety Analysis Report
- f. Technical Specifications
- g. Aging Management Trend Reports
- h. Generic Aging Lessons Learned (GALL) Report, R2 Delta Evaluation
- i. Fleet Use of Operating Experience Procedures
- j. Fleet Trend Codes
- k. Commitment Management Procedures

III. NRC Audit Team Members

| | | | |
|---------------|---------|--------------|---------|
| Bennett Brady | NRR/DLR | Amy Hull | RES/DE |
| Cliff Doult | NRR/DLR | Seung Min | NRR/DLR |
| Jim Gavula | NRR/DLR | Abdul Sheikh | NRR/DLR |
| Bruce Lee | RES/DE | Ata Istar | NRR/DLR |

IV. Applicant Personnel Contacted During Audit

| | | |
|---------------|---------------------|------------|
| M. Fallin | B. Corcoran | P. Collins |
| R. Saunderson | J. Wadsworth | G. Inch |
| J. Stevenson | B. Sullivan | |
| G. Inch | R. Bahai | |
| R. Corieri | J. Blasiak | |
| P. Konu | B. Carter | |
| C. Willett | C. Widay-Poindexter | |
| S. Houston | K. Dellinger | |
| P. Finnerty | T. Roche | |
| B. Shanahan | P. Kehoe | |
| G. Connor | B. Felicita | |
| J. Park | S. Homoki | |

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Sincerely,
/RA/

Bennett M. Brady, Sr. Project Manager
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Division of License Renewal
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*concurrence via e-mail

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| OFFICE | LA:RPB2:DLR* | PM:RPOB:DLR | BC:RPOB:DLR | PM:RPOB:DLR |
| NAME | lKing | BBrady | YDiaz | BBrady |
| DATE | 2/22/2011 | 2/23/2012 | 2/23/2012 | 2/23/2012 |

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Letter to K. Langdon from B. Brady dated February 23, 2012

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