

2009
FirstEnergy Nuclear Operating Company **fenoc**

ACRS: The Latest Chapter
ACRS Interface:
Utility Perspective

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ACRS Experience

- Interaction with ACRS
- Utility Preparation
- Utility Interaction
- Emergent Item Resolution
- Summary

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Interaction with ACRS

- ACRS interaction required for License Renewal
 - Occurs near the end of the review process
- ACRS Committee provides independent review of NRC Safety Evaluation and the Licensee Application
- ACRS panel consists of seasoned industry experts that are technically competent
- License Renewal interaction typically involves 2 meetings
- ACRS provides recommendation to Commission

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Utility Preparation

- **ACRS members will review the submittal, RAI's, the SER, and plant history**
- **Utility presentation; NRC staff presentation**
- **Expect detailed questions**
 - Technical, Industry Operating Experience, Historical performance
 - Ability to detect and correct aging
 - Robust corrective action program
- **Determine the closure path for SER open items**

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Utility Preparation (cont.)

- **Well prepared presenters**
 - Technically competent support team
 - Select program owners & TLAA subject matter experts
 - Environmental and PRA subject experts
- **Preparation documents**
 - RAI response
 - Recent Industry Operating Experience
- **Preparation of site staff**
 - Dry runs
 - Anticipate questions
 - Benchmark meetings

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Utility Interaction

- **ACRS questions were relevant and similar to NRC Staff**
- **Utility personnel were well prepared with concise/accurate responses**
- **Due to the depth of regulatory review, Utility and NRC positions were mutually understood**

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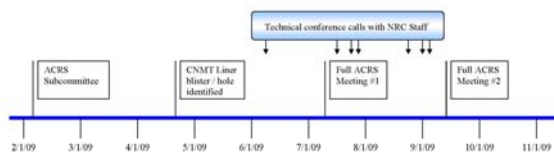
Utility Interaction (cont.)

- **Technical issues may arise during review**
 - ACRS interest anticipated
 - Safety significance
 - Cause
 - Corrective action sufficiency
 - Example: Containment liner defect identified during 2009 ASME Code inspection
 - Identification was after ACRS LRA Subcommittee
 - SER with open items already issued
 - Timing of issue challenged review schedule

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Utility Interaction (cont.)



- **Five months between Scheduled Mtgs.**
 - Draft SER to final SER
- **Two months for Open Item closure & ACRS review**
- **Required significant utility / NRC Staff interaction**

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Emergent Item Resolution

- **Conference calls held with NRC Staff to discuss containment liner**
- **Relevant issues and concerns were addressed**
- **Practicalities of implementation were considered in corrective actions**
 - Physical capabilities
 - Industrial and Radiological safety
- **Guidance in ASME code does not address the specifics of this issue**
- **NRC regional office and Resident briefed frequently – kept informed**
- **The 3rd ACRS meeting was the best way to approach independent review of resolution**

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Summary

- **ACRS will provide a technical challenge**
- **Proper preparation prevents poor performance**
- **Recognize when License Renewal issues are also current operating issues**
- **Operating Experience may lead to corrective actions beyond ASME Code compliance**
- **Frequent communications with NRC Staff**
 - Ensure sufficiency of proposed actions prior to ACRS meeting
 - Ensure physical and safety constraints of corrective action implementation are considered

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