

2009

FirstEnergy Nuclear Operating Company

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ACRS: The Latest Chapter

ACRS Interface:

Utility Perspective

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NRC Public Regulatory Information Conference
March 9, 2010

ACRS Experience

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

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**

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**

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

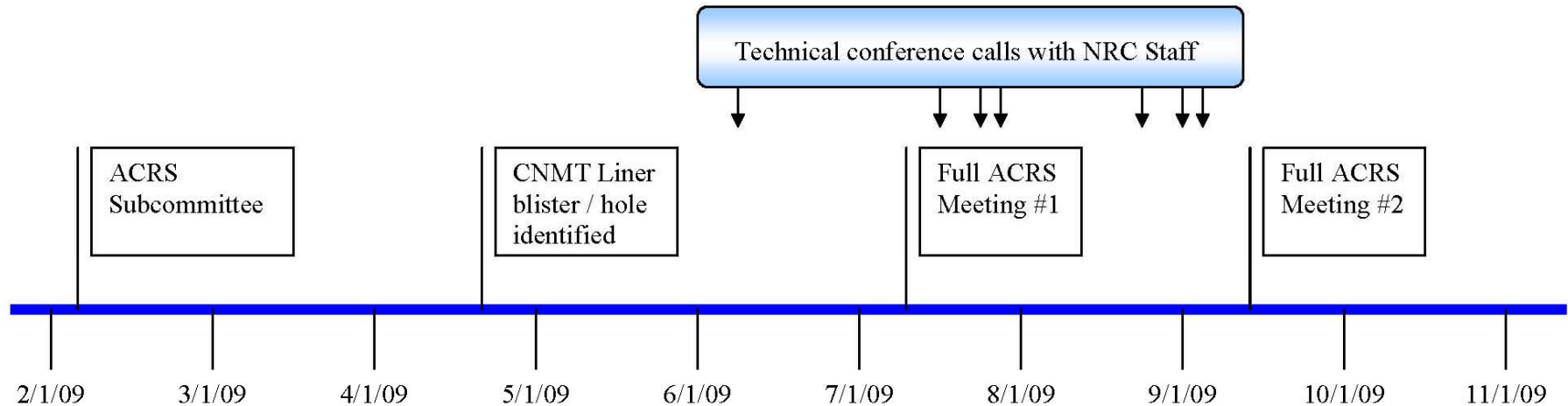
Utility Interaction

- **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**

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

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**

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**

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