

## ***Operating Experience Reviews for Aging Management Programs***

- NRC Program element recommendations for aging management programs (AMPs) recommend that relevant operating experience (OE) be factored into the development of the program elements for AMPs
- Criteria for OE described in Section A.1.2.3.10, “Operating Experience” in NRC Branch Technical Position (BTP) RLSB-1 (NUREG-1800, Section A.1.2.3.10)
- Relevant OE that needs to be addressed and factored into AMP program elements include:
  - plant-specific OE resulting from past implementation of the AMP proposed for aging management which demonstrates the program elements for the AMP will achieve adequate aging management under 10 CFR 54.21(a)(3)
  - plant-specific OE resulting from past implementation of the AMP proposed for aging management that demonstrates the program elements for the AMP would need to be adjusted to achieve adequate aging management
  - relevant generic OE
  - relevant OE resulting from implementation of activities outside the scope of the AMP of review whose results could impact the program elements for the AMP such that the program elements would need to be adjusted

## ***SRP-LR OE Program Element Criteria***

- “Operating experience with existing programs should be discussed. The operating experience of aging management programs, including past corrective actions resulting in program enhancements or additional programs, should be considered. A past failure would not necessarily invalidate an aging management program because the feedback from operating experience should have resulted in appropriate program enhancements or new programs. This information can show where an existing program has succeeded and where it has failed (if at all) in intercepting aging degradation in a timely manner. This information should provide objective evidence to support the conclusion that the effects of aging will be managed adequately so that the structure or component intended function(s) will be maintained during the period of extended operation.”
- “An applicant may have to commit to providing operating experience in the future for new programs to confirm their effectiveness.”

## ***NRC License Renewal Reviews of Relevant OE***

- NRC typically reviews both plant-specific OE and generic OE for their impacts on the program elements of the AMPs that are used for aging management in a LRA
- For GALL-based AMPs, the staff performs its reviews of the OE as part of the NRC's scheduled audits of the GALL-based AMPs in the LRA:
  - Performed by NRC audit reviewer on the OE program element discussions for those GALL-based AMPs assigned to the reviewer
  - Current audit process also includes a review of pertinent OE documented in an applicant's condition report or work control database
- For plant-specific AMPs, the staff performs its reviews of the OE as part of the staff's review of the plant-specific AMPs.
- Additional reviews of relevant OE are performed by the Regional inspectors during the license renewal inspections.

## ***Types of NRC Determinations on NRC OE Reviews***

- Example 1: No OE discussion given.
- Example 2: Past implementation of an existing AMP has yet to detect any evidence of the aging effect that the program manages and an applicant concludes that this demonstrates that the program is effective in managing aging.
- Example 3: An AMP is a new program that has yet to be implemented at the facility and the applicant draws a conclusion that there is not any OE impacting the program elements for the new AMP - without assessing whether there is any relevant generic OE in the industry or plant-specific OE occurring from the implementation of other processes, activities, or programs that could impact the proposed program elements for the new AMP
- Example 4: There is relevant existing plant-specific OE data or generic OE data available which would indicate the need to augment the criteria in one or more of an AMP's program elements - yet the applicant has not factored in OE results or data into adjusting the program element criteria that the OE would impact.