

ATTACHMENT 31

OPERATING EXPERIENCE REVIEW RESPONSIBILITIES

Overview

The intent of this document is to establish responsibilities for U.S. Nuclear Regulatory Commission (NRC) staff and contractors reviewing operating experience for license renewal. This document sets forth the expectation that headquarters-based NRC staff audit teams are to evaluate and independently verify plant-specific operating experience during reviews of license renewal applications (LRAs). Audit team members are expected to follow the guidelines in this document when performing reviews and audits of LRAs.

Background

The NRC's Office of the Inspector General (OIG) audited the effectiveness of the license renewal program, as documented in OIG-07-A-15, "Audit of the NRC's License Renewal Program," dated September 6, 2007 (ML072490486). The audit report concludes that, overall, the NRC has developed a comprehensive license renewal process to evaluate applications for extended operation. However, the OIG identified areas where recommended improvements would enhance program operations. One recommendation pertains to the NRC staff's evaluation of operating experience. The OIG suggested that the NRC establish requirements and management controls to standardize the conduct and depth of license renewal operating experience reviews.

Discussion

The NRC headquarters staff considers operating experience to determine whether the LRA meets the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR), Part 54, "Requirements for Renewal of Operating Licenses for Nuclear Power Plants." NUREG-1800, Revision 1, "Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants" (SRP-LR), dated September 2005, instructs the NRC staff to evaluate operating experience when reviewing (a) scoping and screening results, (b) aging management review results, and (c) time-limited aging analyses.

The SRP-LR references NUREG-1801, Revision 1, "Generic Aging Lessons Learned (GALL) Report," dated September 2005, which identifies aging management programs determined to be acceptable to manage the aging effects of systems, structures and components for license renewal. The NRC staff reviewed industry-wide operating experience in developing the GALL Report aging management programs. An LRA typically includes information on industry operating experience identified after issuance of the GALL Report because the GALL Report already addresses industry operating experience before its publication. If an application references the GALL Report approach for managing aging effects, then the NRC staff will use the GALL Report as the basis for assessing the application. In these assessments the NRC staff confirms that the applicant:

- "... has stated that the applicable aging effects and industry and plant-specific operating experience have been reviewed by the applicant and are evaluated in the GALL Report,"

- "... has addressed operating experience identified after the issuance of the GALL Report," and
- "... has identified those aging effects ... that are contained in the GALL Report as applicable to its plant."

The NRC staff's procedures and acceptance criteria for reviewing aging management review results are detailed in SRP-LR Sections 3.1 to 3.6.

Both headquarters staff and regional inspectors have responsibilities for reviewing plant-specific operating experience during the license renewal process. Regional inspectors follow guidance in Inspection Procedure (IP) 71002, "License Renewal Inspection;" headquarters staff following guidance in the SRP-LR. According to IP 71002 and the SRP-LR, the distinction between the responsibilities of the headquarters staff and regional inspectors are:

- Regional inspectors perform inspections to verify the accuracy of information in the license renewal application, including operating experience
- Headquarters staff review the information in the application, including operating experience, to make a determination as to whether the application meets the requirements of 10 CFR Part 54

Furthermore, the headquarters-based NRC staff audit team will verify select plant operating experience during the onsite license renewal audits. The basic methodology is to:

- (1) independently search licensee records for potential operating experience issues,
- (2) examine the results of this search to find those issues that concern aging degradation, and
- (3) determine whether the applicant appropriately considered these issues in the LRA.

The independent search of licensee records may include corrective actions, system health reports, inspection results, and other sources of operating experience information. In most cases the audit team can easily retrieve operating experience information by searching the licensee's condition report or corrective action database. The audit team will use appropriate key words or phrases to find operating experience that may warrant further examination. These terms may be derived from such things as the parameters monitored by a program, the aging effects within the scope of a program, any past program augmentations, or current industry operating experience. For example, the audit team may retrieve operating experience related to the licensee's fuel oil chemistry program by searching the database for "particulates," "contamination," and "water," all of which are parameters of importance to that program. The audit team will review the pertinent operating experience and determine whether it was appropriately addressed in the application. Follow-up questions may be necessary to ensure that the applicant appropriately considered the operating experience for license renewal. The audit team will document the results of its independent verification of operating experience in the audit summary report, as shown in License Renewal Project Manager Handbook Attachment 32, "Audit Report Guidance."