

Davis-BesseNPEm Resource

From: dorts@firstenergycorp.com
Sent: Wednesday, July 11, 2012 3:35 PM
To: Harris, Brian
Cc: CuadradoDeJesus, Samuel; custer@firstenergycorp.com
Subject: FENOC Letter L-12-243 -- Response to Davis-Besse License Renewal RAI on Operating Experience
Attachments: L-12-243 Amd 28 & RAI OE_Rev B.pdf

Brian..... attached is a copy of FENOC Letter L-12-243 providing the response to the NRC request for additional information related to Operating Experience for Davis-Besse License Renewal, and Amendment 28 to the License Renewal Application.

Should you have questions regarding the attached letter, please contact Cliff Custer or me.

Thank you,

Steve Dort
Davis-Besse License Renewal

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L-12-243

10 CFR 54

ATTN: Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT:

Davis-Besse Nuclear Power Station, Unit No. 1
Docket No. 50-346, License Number NPF-3
Reply to Request for Additional Information for the Review of the Davis-Besse Nuclear Power Station, Unit No. 1, License Renewal Application (TAC No. ME4640) and License Renewal Application Amendment No. 28

By letter dated August 27, 2010 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML102450565), FirstEnergy Nuclear Operating Company (FENOC) submitted an application pursuant to Title 10 of the *Code of Federal Regulations*, Part 54 for renewal of Operating License NPF-3 for the Davis-Besse Nuclear Power Station, Unit No. 1 (Davis-Besse). By letter dated June 12, 2012 (ML12160A016), the Nuclear Regulatory Commission (NRC) requested additional information to complete its review of the License Renewal Application (LRA).

The Attachment provides the FENOC reply to the NRC request for additional information. The NRC request is shown in bold text followed by the FENOC response. The Enclosure provides Amendment No. 28 to the Davis-Besse LRA.

There are no regulatory commitments contained in this letter. If there are any questions or if additional information is required, please contact Mr. Clifford I. Custer, Fleet License Renewal Project Manager, at 724-682-7139.

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 11, 2012.

Sincerely,



Barry S. Allen

Davis-Besse Nuclear Power Station, Unit No. 1
L-12-243
Page 2

Attachment:

Reply to Request for Additional Information for the Review of the Davis-Besse Nuclear Power Station, Unit No. 1 (Davis-Besse), License Renewal Application, Section B.1.4

Enclosure:

Amendment No. 28 to the Davis-Besse License Renewal Application

cc: NRC DLR Project Manager
NRC Region III Administrator

cc: w/o Attachment or Enclosure
NRC DLR Director
NRR DORL Project Manager
NRC Resident Inspector
Utility Radiological Safety Board

Attachment
L-12-243

Reply to Request for Additional Information for the Review of the
Davis-Besse Nuclear Power Station, Unit No. 1 (Davis-Besse),
License Renewal Application,
Section B.1.4
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Section B.1.4

Question RAI B.1.4-4

Background:

In request for additional information (RAI) B.1.4-1, issued on May 19, 2011, the staff asked the applicant to describe the programmatic activities that will be used to continually identify aging issues, evaluate them, and as necessary, enhance the aging management programs (AMPs) or develop new AMPs for license renewal. After reviewing the applicant's response dated June 24, 2011, the staff issued follow-up RAI B.1.4-2, requesting specific details to the applicant's Operating Experience Program (OEP). In its response dated March 9, 2012, the applicant provided further details about its program.

On March 16, 2012, the NRC issued LR-ISG-2011-05, "Ongoing Review of Operating Experience" to clarify the staff's position that license renewal AMPs should be informed, and enhanced when necessary, based on the ongoing review of both plant-specific and industry operating experience.

Issue:

In reviewing aspects of the applicant's program against the guidance set forth in LR-ISG-2011-05, the staff needs further clarification regarding training.

Request:

Where the applicant states in the LRA Section A.1 that "personnel responsible for screening, evaluating and submitting ... age-related operating experience items are qualified for the task," the staff is not clear what "qualified for the task" implies. In addition, the applicant's response to RAI B.1.4-2(e) is not clear in establishing the stated goals of the "needs analysis" for personnel training as it relates to age-related operating experience and maintenance of AMPs. Please provide updates to LRA Section A.1 and further clarification to your description regarding training related to operating experience, consistent with the guidance in LR-ISG-2011-05.

RESPONSE RAI B.1.4-4

The following information is derived from the training procedures and activities performed by FirstEnergy Nuclear Operating Company (FENOC) using the Systematic Approach to Training (SAT) processes published by the Institute of Nuclear Power Operations (INPO) National Academy for Nuclear Training.

Meaning of the term “qualified for the task”

The term “qualified for the task” has a specific meaning at FirstEnergy Nuclear Operating Company (FENOC). “Qualified” is defined in company training procedures as:

“The characteristics or abilities gained through education, experience, or training, as measured against established standards, that enable an individual to independently perform a required function. Qualification is synonymous with completion of a training activity or activities.”

FENOC personnel are required to complete specific training activities in accordance with FENOC training procedures to achieve qualification for position-specific job functions at Davis-Besse. Upon completion of the requisite training activities, qualifications are posted in an electronic qualification matrix.

Goals of the “needs analysis”

The Systematic Approach to Training process employed by FENOC includes the use of a “needs analysis” to determine training needs for a given position-specific job function. The needs analysis includes an evaluation of each job task to identify the training necessary to ensure individuals in a given position have the required knowledge and skills for independent performance of the job tasks. The needs analysis is used with applicable job and task analysis as part of the Systematic Approach to Training process to determine the topics, content and frequency of training necessary to train personnel and document that an individual is “qualified for the task.”

With respect to age-related operating experience and maintenance of aging management programs, the needs analysis will result in new training materials or modifications to existing training materials for those positions responsible for screening, evaluating, and submitting age-related operating experience items, and implementing changes to aging management programs.

LRA Section A.1, "Summary Descriptions of Aging Management Programs and Activities," "Operating Experience" subsection, is revised to include clarification in the description regarding training related to operating experience, and to better align the FENOC Operating Experience Program summary with License Renewal Interim Staff Guidance LR-ISG-2011-05, "Ongoing Review of Operating Experience."

See the Enclosure to this letter for the revision to the Davis-Besse LRA.

Enclosure

Davis-Besse Nuclear Power Station, Unit No. 1 (Davis-Besse)

Letter L-12-243

**Amendment No. 28 to the
Davis-Besse License Renewal Application**

Page 1 of 3

**License Renewal Application
Section Affected**

Section A.1

The Enclosure identifies the change to the License Renewal Application (LRA) by Affected LRA Section, LRA Page No., and Affected Paragraph and Sentence. The count for the affected paragraph, sentence, bullet, etc. starts at the beginning of the affected Section or at the top of the affected page, as appropriate. Below each section the reason for the change is identified, and the sentence affected is printed in *italics* with deleted text ~~*lined out*~~ and added text *underlined*.

<u>Affected LRA Section</u>	<u>LRA Page No.</u>	<u>Affected Paragraph and Sentence</u>
A.1	Page A-9	3 rd paragraph, and 1 st bullet

In response to RAI B.1.4-4, the third paragraph and the first bulleted item of LRA Section A.1, "Summary Descriptions of Aging Management Programs and Activities," previously added by FENOC letter dated March 9, 2012 (ML12094A383), are revised to read as follows:

Operating Experience

~~The intent of evaluating and incorporating operating experience lessons learned, including aging-related lessons learned, is prevention. The lessons learned are used to improve plant operation, equipment material condition, and aging management to minimize equipment degradation and prevent loss of equipment intended functions. Operating experience from plant-specific and industry sources is captured and systematically reviewed on an ongoing basis in accordance with the quality assurance program, which meets the requirements of 10 CFR Part 50, Appendix B, and the operating experience program, which meets the requirements of NUREG-0737, "Clarification of TMI Action Plan Requirements," Item I.C.5, "Procedures for Feedback of Operating Experience to Plant Staff." The operating experience program interfaces with and relies on active participation in the Institute of Nuclear Power Operations' operating experience program, as endorsed by the NRC. The FENOC Operating Experience Program processes and procedures for the ongoing review of operating experience include the following attributes:~~

- ~~Personnel responsible for screening, evaluating and submitting (to the industry) aging-related operating experience items are qualified for the task. Training on age-related degradation and aging management is provided to those personnel responsible for implementing aging management programs and who may submit, screen, assign, evaluate, or otherwise process plant-specific and industry operating experience to ensure they are qualified for the task. This training is to occur on the frequency determined by FENOC training procedures and processes, and includes provisions to accommodate the turnover of plant personnel.~~
- While the programs and procedures may specify reviews of certain sources of information, such as NRC generic communications and Institute of Nuclear Power Operations reports, they allow for any potential source of relevant plant-specific or industry operating experience information.

- The processes are adequate so as to not preclude the consideration of operating experience related to aging management. The processes allow for appropriately gathering information on structures and passive components within the scope of license renewal, their materials, environments, aging effects, and aging mechanisms, and the aging management programs credited for managing the effects of aging, including the activities under these programs (e.g., inspection methods, preventive actions or evaluation techniques).
- Plant-specific operating experience, including aging-related operating experience, is documented in condition reports and processed using the FENOC Corrective Action Program. Condition reports for adverse conditions and related documents captured in the Corrective Action Program database are quality records and are auditable and retrievable.
- Industry operating experience, including aging-related operating experience, is entered into the Operating Experience Program database and screened for applicability to FENOC. Documents captured in the Operating Experience Program database are retrievable.
- Evaluations of internal and external aging-related operating experience issues associated with structures and passive components include consideration of the affected structure or component, material, environment, aging effect, aging mechanism, and aging management program, with feedback to the affected aging management program owner for consideration of the impact to aging management program effectiveness.
- Aging management program owners review data collected by program activities, use the Corrective Action Program to document adverse conditions to ensure they will be addressed and corrected, maintain required records for the program, maintain the program current, and implement revisions as needed based on program results and internal or external operating experience evaluations. Revision of existing or development of new aging management programs based on operating experience evaluations is performed through corrective actions using the Corrective Action Program, or by action items identified in the Operating Experience Program database.
- Noteworthy plant-specific aging-related operating experience is shared with the other FENOC sites and the industry. The Operating Experience Program procedure provides guidance on sharing internal operating experience.