

**From:** James Davis  
**To:** Bford@entergy.com; Dellis1@entergy.com  
**Date:** 06/29/2006 3:40:55 PM  
**Subject:** Non-Safety Related SCs

Here is the question I discussed with you on the phone, Brian. How are non-safety related SCs handled in terms of elements 7, 8, and 9? Will there be a commitment and an FSAR writeup to handle non-safety related SCs? I have attached the writeup from the Browns Ferry SER for information.

Jim

**CC:** Kenneth Chang ; Peter Wen; Ram Subbaratnam

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**Subject:** Non-Safety Related SCs  
**Creation Date** 06/29/2006 3:40:55 PM  
**From:** James Davis

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entergy.com PM BFord (Bford@entergy.com) dellis1 (Dellis1@entergy.com)	Transferred	06/29/2006 3:41:43
nrc.gov OWGWPO03.HQGWDO01 PM KXC2 CC (Kenneth Chang )	Delivered	06/29/2006 3:40:55
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MESSAGE	605	06/29/2006 3:40:55 PM
Element 7, 8, and 9.wpd	11296	06/29/2006 11:08:20 AM

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### 3.0.4 Quality Assurance Program Attributes Integral to Aging Management Programs

Pursuant to 10 CFR 54.21(a)(3), a license renewal applicant is required to demonstrate that the effects of aging on SCs subject to an AMR will be adequately managed so that their intended functions will be maintained consistent with the CLB for the period of extended operation.

SRP-LR, Branch Technical Position RLSB-1, "Aging Management Review - Generic," describes ten attributes of an acceptable AMP. Three of these ten attributes are associated with the quality assurance activities of corrective action, confirmation processes, and administrative controls. Table A.1-1, "Elements of an Aging Management Program for License Renewal," of Branch Technical Position RLSB-1 provides the following description of these quality attributes:

- Corrective actions, including root cause determination and prevention of recurrence, should be timely.
- The confirmation process should ensure that preventive actions are adequate and that appropriate corrective actions have been completed and are effective.
- Administrative controls should provide a formal review and approval process.

SRP-LR, Branch Technical Position IQMB-1, "Quality Assurance For Aging Management Programs," noted that those aspects of the AMP that affect quality of SR SSCs are subject to the quality assurance (QA) requirements of 10 CFR Part 50, Appendix B. Additionally, for NSR SCs subject to an AMR, the existing 10 CFR Part 50, Appendix B, QA program may be used by the applicant to address the elements of corrective action, the confirmation process, and administrative controls. Branch Technical Position IQMB-1 provides the following guidance with regard to the QA attributes of AMPs:

- SR structures and components are subject to 10 CFR Part 50, Appendix B, requirements, which are adequate to address all quality-related aspects of an AMP consistent with the CLB of the facility for the period of extended operation.

For NSR SCs that are subject to an AMR for license renewal, an applicant has an option to expand the scope of its 10 CFR Part 50 Appendix B program to include these structures and components to address corrective actions, the confirmation process, and administrative controls for aging management during the period of extended operation. In this case, the applicant should document such a commitment in the FSAR supplement in accordance with 10 CFR 54.21(d).