

From: James Davis
To: erachp@comcast.net
Date: 06/29/2006 2:59:04 PM
Subject: Re: QA for aging management of NSR components

Erach,

I looked to see what the QA branch put in the Browns Ferry SER and here is what I found.

"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)."

I will send a question to the applicant and ask if they intend to expand the scope of their Appendix B program to include NDR SCs and if the commitment to do this will go in their FSAR supplement. As far as your write up goes, for Element 7 repeat what is said above. For Element 8 and 9 say see Element 7.

Jim

>>> <erachp@comcast.net> 06/29/2006 9:31 AM >>>
Jim/Peter,

SRP section 3.3.2.2.15 states:

3.3.2.2.15 Quality Assurance for Aging Management of Nonsafety-Related Components

Acceptance criteria are described in Branch Technical Position IQMB-1 (Appendix A.2, of this SRP-LR.)

SRP section 3.3.3.2.15 states:

"The applicant's aging management programs for license renewal should contain the elements of corrective actions, the confirmation process, and administrative controls. Safety-related components are covered by 10 CFR Part 50, Appendix B, which is adequate to address these program elements. However, Appendix B does not apply to nonsafety-related components that are subject to an AMR for license renewal. Nevertheless, the applicant has the option to expand the scope of its 10 CFR Part 50, Appendix B program to include these components and address the associated program elements. If the applicant chooses this option, the reviewer verifies that the applicant has documented such a commitment in the FSAR Supplement. If the applicant chooses alternative means, the branch responsible for quality assurance should be requested to review the applicant's proposal on a case-by-case basis."

The same statement appears in each SRP section 3.1, 3.2, 3.3, 3.4, 3.5, 3.6. How do we handle this? There should be one set of standard words that is applied in each of the AMR sections.

The following is what is stated in the Oyster Creek Audit Report shell that we are following:

3.3.2.2.15 Quality Assurance for Aging Management of Nonsafety-Related Components

OCGS LRA Section 3.3.2.2.15 is reviewed by NRR DE staff and will be addressed separately in Section 3 of the SER related to the OCGS LRA.

The applicant states in LRA Appendix B.0.3:

PNPS quality assurance (QA) procedures, review and approval processes, and administrative controls are implemented in accordance with the requirements of 10 CFR Part 50, Appendix B. The Entergy Quality Assurance Program applies to PNPS safety-related structures and components. Corrective actions and administrative (document) control for both safety-related and nonsafety-related structures and components are accomplished per the existing PNPS corrective action program and document control program.

Please advise.

Erach

CC: Dan Hoang; Duc Nguyen; James Medoff; Peter Wen

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