

NRC INSPECTION MANUAL

DLR

INSPECTION PROCEDURE 71013

SITE INSPECTION FOR PLANTS WITH A TIMELY RENEWAL APPLICATION

PROGRAM APPLICABILITY: IMC 2515

71013-01 INSPECTION OBJECTIVES

01.01 To determine whether commitments made by the licensee to implement actions such as proposed license conditions, other regulatory commitments accepted by the staff during the course of license renewal, selected aging management programs (AMPs), and time-limited aging analyses (TLAAs) are implemented or completed

01.02 To verify the license renewal application is updated annually in accordance with the requirement to submit changes to the current licensing basis (CLB) during the U.S. Nuclear Regulatory Commission (NRC) review of the license renewal application as required by 10 CFR 54.21(b)

01.03 To verify the “newly identified” systems, structures, and components (SSCs) are or will be included in the annual updated final safety analysis report (UFSAR) updates as required by 10 CFR 54.37(b)

01.04 To verify the description of the AMPs and related activities covered in §01.01 that are contained in the UFSAR supplement are consistent with the programs the licensee agreed to implement

01.05 To verify changes to the regulatory commitments the licensee agreed to implement or complete for license renewal are evaluated in accordance with NEI 99-04, “Guidelines for Managing NRC Commitment Changes” as endorsed by regulatory issue summary (RIS) 2000-017, and changes to the license renewal activities incorporated as part of the UFSAR are evaluated in accordance with the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) 50.59

71013-02 INSPECTION REQUIREMENTS

02.01 General Inspection Requirements.

- a. Verify that the licensee adequately completed the commitments made to implemented actions such as proposed license conditions, other regulatory commitments accepted by the staff during license renewal, AMPs and TLAAAs.
- b. Verify the license renewal application is updated annually in accordance with the requirement to submit changes to the CLB during NRC review of the license renewal application, according to 10 CFR 54.21(b).

- c. Verify that “newly identified” SSCs are or will be included in the annual UFSAR updates as required by 10 CFR 54.37(b) and the guidance provided in RIS 2007-016.
- d. Verify the UFSAR supplement as revised describes the AMPs and TLAAs in the SER for license renewal. Also verify the UFSAR supplement description matches the AMP or TLAA being implemented and that changes, caused by the inclusion of “newly identified” SSCs, were included in the UFSAR supplement.
- e. Verify the licensee properly evaluated, and reported when necessary, changes to regulatory commitments in accordance with NEI 99-04 as endorsed by RIS 2000-017. Review changes to license renewal activities incorporated as part of the UFSAR in accordance with 10 CFR 50.59. Review planned changes to AMPs, TLAAs and other license renewal actions.

71013-03 INSPECTION GUIDANCE

03.01 General Guidance.

In accordance with 10 CFR 2.109(b), if the licensee of a nuclear power plant files a sufficient application for renewal of an operating license at least 5 years before the expiration of the existing license, the existing license will not be deemed to have expired until the application has been finally determined. As such, the licensee will continue to conduct activities in accordance with the facility’s current licensing basis and this may involve operation of the plant beyond the expiration date of the original operating license. Inspection procedure (IP) 71013 was developed for the inspection of license renewal programs for licensees with timely renewal applications to allow for timely verification by NRC inspectors that the licensee has implemented its commitments to AMPs, TLAAs, regulatory commitments accepted by the staff during license renewal as well as commitments to proposed license conditions agreed to by the licensee while the application is being determined and before entering its post-40-year license period. In this case, IP 71003, “Post-Approval Site Inspection for License Renewal,” would not be applicable. The intent is to perform either IP 71013 or IP 71003, but not both. The Regions should perform IP 71013 at those plants with license renewal applications that have not yet been determined. The Regions should perform IP 71003 at those plants with renewed operating licenses.

03.02 Inspection Schedule.

A majority of this inspection is to be performed following the issuance of an SER for license renewal but prior to the expiration date of the original operating license. This may vary as changes occur in the license renewal review process. The inspections are scheduled to support completion of the review in sufficient time for licensees to make any necessary corrections to its AMPs before entering the period of operation beyond the expiration date of the original operating license. Since certain programs and activities may or may not be implemented or completed at the time this inspection occurs, the inspection may be performed in three phases to accommodate the site’s implementation schedule, with the potential issuance of three separate inspection reports. Performing this inspection using a three-phase approach is a recommendation and not a requirement.

- a. Phase I: This portion of the inspection is likely to occur during the second to last and/or last refueling outage prior to the expiration date of the original operating license.

This Phase of the inspection is intended to observe the implementation of select AMPs and activities described in the commitments made to proposed license conditions, the UFSAR supplement, AMPs, TLAAs and other regulatory commitments accepted by the staff during license renewal, as well as any testing, or visual inspections of SSCs which are only accessible at reduced power levels. Those SSCs may be located inside the containment, and other high radiation areas. This inspection may occur at each unit of a multi-unit site.

- b. Phase II: This portion of the inspection is likely to occur three months to a year prior to the expiration date of the original operating license, depending on the site's implementation schedule of outages and license renewal activities.

This Phase of the inspection is intended to be a one-time major team inspection per site. However, for multi-unit sites, subsequent Phase II inspections may be conducted, as deemed necessary by regional management. Subsequent Phase II inspections at multi-unit sites may not require the same level of effort as the Phase II inspection for the first unit. The inspectors will assess the adequacy and effectiveness of the implementation and/or completion of the programs and activities described in the regulatory commitments accepted by the staff during license renewal, UFSAR supplement program descriptions, TLAAs, and commitments made to proposed license conditions as agreed to by the licensee while the application for renewal is being determined, as well as evaluate the need for any additional follow-up inspections under this inspection procedure or as part of the reactor oversight program (ROP).

- c. Phase III: This portion of the inspection is likely to occur beyond the expiration date of the original operating license in accordance with the implementation schedule of the commitments made to proposed license conditions, AMPs, TLAAs and other regulatory commitments accepted by the staff during license renewal.

This Phase of the inspection is intended to review the implementation of the commitments made to proposed license conditions, regulatory commitments accepted by the staff during license renewal, TLAAs and AMPs with implementation schedules that extend beyond the expiration date of the original operating license, as agreed to by the licensee while the application for renewal is being determined. Additionally, this phase may be implemented to review corrective actions for issues of concern identified during Phases I and II inspections.

If, during the planning, execution, or documentation of this procedure, the NRC determines the operating license will not be renewed, inspection efforts should cease. If, during the planning, execution or documentation of this procedure, the NRC approves and renews the operating license, the inspection efforts should shift to the corresponding portion of IP 71003, "Post-Approval Site Inspection for License Renewal."

03.03 Document Review.

Inspectors should familiarize themselves with the requirements and guidance related to license renewal. The inspectors should also familiarize themselves with the specific license renewal application and associated SER for the plant being inspected. License renewal requirements and guidance documents that should be reviewed prior to this inspection include:

- 10 CFR Part 54, "Requirements for Renewal of Operating Licenses for Nuclear Power Plants"
- The statement of consideration published with the revision to 10 CFR Part 54 in the Federal Register, Vol. 60, No. 88, Monday, May 8, 1995, pages 22461 to 22495
- The SER and applicable supplements for the plant(s) to be inspected
- Appendix A of the SER, if applicable
- The UFSAR supplement as revised during the license renewal application review

03.04 Inspection Sample Attributes.

In selecting samples, consideration should be given to attributes such as:

- The risk significance of SSCs associated with the regulatory commitments, using insights gained from sources such as the NRC's "Significance Determination Process (SDP) Risk Informed Inspection Notebooks," Revision 2
- The extent of previous license renewal audits and inspections of AMPs
- The extent that baseline inspection programs will inspect an SSC or commodity group
- The type and maturity of the AMP, for example, programs such as the selective leaching one-time inspection program, or infrequent inspection activities may take priority over long-standing programs such as the Steam Generator Tube Integrity Program, which are routinely inspected
- Issues that were addressed in an Atomic Safety Licensing Board (ASLB) hearing or Advisory Committee on Reactor Safeguards (ACRS) committee meeting
- Issues that were in the public domain at the time of the license renewal application review

03.05 Level of Effort.

This inspection is performed before the expiration date of the original operating license (with the exception of Phase III which may occur after the expiration of the original operating license). Additionally, the number of AMPs, regulatory commitments, TLAAs and commitments made to proposed license conditions vary broadly from plant to plant. Therefore, this procedure does not contain a predetermined sample size for each component of the inspection that would uniformly represent each plant. As such, the lead inspector will determine the sample size and extent of review of the commitments made to proposed license conditions, AMPs, TLAAs and regulatory commitments prior to performing these inspections. The lead inspector should ensure that the team comprehensively inspects a majority (recommended greater than 70%) of the number of: (1) new AMPs or enhancements to existing AMPs, (2) regulatory commitments, (3) TLAAs, and (4) commitments made to proposed license conditions to assess the adequacy and effectiveness of the license renewal program. Some sites may not require the same level of inspection effort as others and may be inspected using a smaller sample size. Also some multi-unit sites may contain units with similar designs, and therefore may not require the same level of inspection at the additional units as was received for the first unit. The lead inspector should use discretion in determining the inspection sample size at multi-unit sites with similar designs between the units.

03.06 Inspection Sample Selection.

Although the renewed operating license has not been issued, the licensee may have agreed to complete certain license renewal activities to support entering the period of extended operation.

The sample section should be based upon the AMPs, TLAAs, regulatory commitments, and also commitments made to proposed license conditions the licensee has agreed to implement while the license renewal application is being determined.

- a. Selection of Commitments Made to Proposed License Conditions: The sample may include a review of selected commitments made to proposed license conditions. A sample population of commitments made to proposed license conditions will be inspected to the extent necessary to determine that the license conditions were implemented consistent with the licensee's commitments. Inspection of the commitments made to proposed license conditions should include a review of supporting documentation to determine if the licensee has taken the appropriate actions, including corrective action, to satisfy a particular license condition. Appropriate technical expertise should be requested from the license renewal program office if needed.
- b. Selection of Regulatory Commitments: The sample should include a review of selected regulatory commitments which were accepted by the staff during the course of the license renewal application review and describes a modification or enhancement to a program, or future actions necessary for compliance with 10 CFR Part 50 or 10 CFR Part 54. The selected regulatory commitments will be inspected to the extent necessary to determine that the commitments were implemented, and any modifications were completed in accordance with NEI 99-04 as endorsed by RIS 2000-017. The inspection team should determine there is reasonable assurance the commitment tracking program is effective. The inspection of regulatory commitments should include a review of supporting documentation to determine if the licensee has taken the appropriate actions, including corrective action, to satisfy a particular commitment. Appropriate technical expertise should be requested from the license renewal program office if needed.
- c. Selection of AMPs: The sample should include a review of selected AMPs that are new, or have been modified or enhanced. The selected AMPs will be inspected to the extent necessary to determine that updates, modifications and implementation occurred consistent with the licensee's commitments. AMP activities, bases and acceptance criteria should be appropriately proceduralized. The license renewal program office recommends that the inspector include as part of his or her sample selection the Buried and Underground Piping and Tanks Program, the One-Time Inspection Program, and the Selective Leaching Program on the basis that these programs may involve new or unique inspection or testing activities that are being performed by the licensee for the first time or may identify inspection or test results that the licensee may not have experienced in the past. Appropriate technical expertise should be requested from the license renewal program office if needed.
- d. Selection of TLAAAs: The sample should include a review of selected TLAAAs that have an associated AMP in accordance with 10 CFR 54.21(c)(1)(iii). The inspector should verify that the AMP describes how the licensee will manage, update or refine the TLAA during the PEO. The inspector should verify that the AMP demonstrates how the licensee meets the acceptance criteria for the CLB. The AMP should contain the licensee's actions when the CLB acceptance criteria are exceeded. The licensee's actions may include taking the appropriate corrective actions to repair and/or replace impacted SSCs, recalculating the TLAA, or initiating additional inspection activities.

AMP activities, bases and acceptance criteria that relate to TLAA acceptance under 10 CFR 54.21(c)(1)(iii) should be appropriately proceduralized. There are currently three programs that the inspector may want to include as part of his or her sample selection: the Fatigue Monitoring Program, the Concrete Containment Tendon Prestress Program, and the Environmental Qualification of Electric Components Program. However, the inspector may want to contact the license renewal program office to identify which TLAAs were of significant interest during the license renewal application review for a particular plant to determine which TLAAs will be reviewed for this portion of the inspection. Also, for questions or concerns by the inspector during the review of highly specialized TLAAs, or for errors identified by the inspector to have significant impact on 10 CFR 54.21(c)(1)(i) or 10 CFR 54.21(c)(1)(ii), assistance should be requested from the license renewal program office.

- e. Inspection of Newly Identified Systems: Licensees may identify new SSCs that should be within the scope of its license renewal program at any time. Any “newly identified” SSCs may be inspected to the extent necessary to ensure that the licensee adequately evaluated and included applicable SSCs into its AMPs or TLAAs. Inspectors should contact Division of License Renewal (DLR) staff for: (1) information on generic communications that were issued naming newly identified SSCs, or (2) technical assistance regarding the review of new aging management programs that have been developed by the licensee.
- f. Inspection of the UFSAR supplement: The UFSAR supplement describes the AMPs and TLAAs in the SER for license renewal. This inspection verifies that the UFSAR supplement description matches the AMP or TLAA being implemented and that changes, caused by the inclusion of “newly identified” SSCs, were included in the UFSAR supplement. If the licensee has not submitted an UFSAR supplement update since implementing the AMP or TLAA, review the planned UFSAR supplement changes and verify that they are included in an appropriate tracking system.

03.07 Dispositioning Issues of Concern.

The renewed operating license may not be issued at the time this inspection occurs. Therefore, inspectors can document observations and issues of concern associated with the implementation and/or completion of commitments made to proposed license conditions, regulatory commitments, TLAAs and AMPs, which will be evaluated and dispositioned using the guidance in Inspection Manual Chapters 0612 and 2516, and may be used to determine the acceptability of the license renewal application.

71013-04 RESOURCE ESTIMATES

The total resource expenditure of this inspection procedure is estimated to be approximately 1,120 hours for a one-unit site, 2,052 hours for a dual-unit site, and 2,850 hours for a three-unit site. This resource estimate includes the preparation and documentation weeks. This resource estimate does not include the time spent travelling to and from the site. It is expected that the four Regions will coordinate the scheduling of license renewal inspections and share resources so as not to exceed the total resources allocated per year for all license renewal inspections.

71013-05 REFERENCES

IP 71003, "Post-Approval Site Inspection for License Renewal"

10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities"

10 CFR Part 54, "Requirements for Renewal of Operating Licenses for Nuclear Power Plants"

IMC 0308, "Reactor Oversight Process Basis Document"

IMC 0612, "Power Reactor Inspection Reports"

IMC 2515, "Light-Water Reactor Inspection Program – Operations Phase"

IMC 2516, "Policy and Guidance for the License Renewal Inspection Program"

NRR Office Instruction LIC-105, "Managing Regulatory Commitments Made by the Licensee to the NRC"

NEI 99-04, "Guidelines for Managing NRC Commitment Changes" Revision 0, July 1999

NUREG-1800, "Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants"

NUREG-1801, "Generic Aging Lessons Learned (GALL) Report"

NRC-approved Interim Staff Guidance positions relating to license renewal

Regulatory Issue Summary (RIS) 2007-16, "Implementation of the Requirements of 10 CFR 54.37(b) for Holders of Renewed Licenses"

RIS 2000-017, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff"

END

Attachment 1 – Revision History For 71013

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment and Feedback Resolution Accession Number
N/A	ML13032A102 09/25/13 CN 13-023	A four year historical search for commitments was performed. Change Notice 11-004 for temporary instruction (TI) 2516/001 was found related to timely renewal inspection activities. TI 2516/001, Review of License Renewal Activities, expires on December 31, 2013, at which point timely renewal inspection activities will be conducted in accordance with IP 71013.	N/A	N/A