

### REVIEW OF LICENSE RENEWAL ACTIVITIES

**PROGRAM APPLICABILITY:** This temporary instruction (TI) applies to Indian Point Nuclear Generating Unit 2 and Pilgrim Nuclear Power Station only.

#### 2516/001-01 INSPECTION OBJECTIVES

01.01 To report the status of the applicant's implementation of license renewal commitments, license conditions and selected aging management programs as described in a plant's license renewal safety evaluation report (LR-SER).

01.02 To verify that 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 that "newly identified" systems, structures, and components (SSCs) are included in the annual FSAR updates as required by 10 CFR 54.37(b) and the guidance provided in Regulatory Issue Summary (RIS) 2007-16, Revision 1, "Implementation of the Requirements of 10 CFR 54.37(b) for Holders of Renewed Licenses," dated April 28, 2010.

01.04 To verify that the applicant's description of the programs and activities for managing the effects of aging are consistent with the final safety analysis report (FSAR) supplement summary descriptions (included in Sections 3 and 4 of the LR-SER).

#### 2516/001-02 BACKGROUND

Recently, the NRC experienced challenges in the inspection of license renewal activities and documentation of inspection results associated with completion of Inspection Procedure (IP) 71003, "Post-Approval Site Inspection for License Renewal," at the Oyster Creek facility. These challenges resulted because (1) IP 71003 was structured to be completed after the license was renewed, (2) license renewal at Oyster Creek station was delayed, and (3) the NRC expected to verify that the applicant had implemented license renewal commitments before it entered the period of extended operation (i.e., the post-40-year license period). This TI is written to allow for timely verification by NRC inspectors that the applicant has made sufficient progress in implementing its license renewal commitments before entering its post-40-year license period and to allow documentation of these inspection activities while the operating

license is being considered for renewal.

This TI shall be performed in cases where holders of an operating license meet the criteria of 10 CFR 2.109, "Effect of Timely Renewal Application," for timely renewal but IP 71003 cannot be performed in a timely manner because the NRC's final decision regarding the renewal of the operating license may not allow sufficient time to plan and conduct post license-renewal inspection before the period of extended operation.

The primary purpose of this TI is to allow the NRC to verify selected commitments made by the applicant during the license renewal process when such verification requires access to areas normally not accessible during power operations and to verify that the applicant has successfully implemented commitments associated with other SSCs outside containment or high-radiation areas as described in its LR-SER before the applicant enters the period of extended operation (the post-40-year licensing period).

The focus of the TI will be to verify testing of SSCs and applicant implementation of aging management programs associated with SSCs that require inspector access to containment or to areas normally considered high-radiation areas during power operations. Additionally, inspectors will verify the applicant's completion of selected license renewal commitments, other than those requiring access to containment or to high-radiation areas, to ensure confidence that the applicant has made reasonable progress in completing its license renewal commitments before entering the period of extended operation. Any additional inspections to follow up on issues identified during this TI should be performed using IP 71003 if the license is renewed. Also, the NRC should have completed IP 71002, "License Renewal Inspection," before this TI is performed.

## 2516/001-03          INSPECTION REQUIREMENTS AND GUIDANCE

03.01 Review of License Renewal Commitments and License Conditions. Select a sample of completed commitments and license conditions to verify that the applicant has completed the actions necessary to comply with the draft license conditions in the NRC staff's LR-SER and has implemented the aging management programs and time-limited aging analyses (TLAAs) included in the LR-SER.

Inspectors should familiarize themselves with the requirements and guidance relating to license renewal in general. The inspectors should familiarize themselves with the specific license renewal application and associated LR-SER for the plant being inspected. License renewal requirements and guidance documents that should be reviewed before an inspection include the following:

- 10 CFR Part 54
- Statement of Consideration published with the revision to 10 CFR Part 54 in the *Federal Register*, Volume 60, No. 88, May 8, 1995, pages 22461 to 22495
- plant-specific license renewal application

- SER and Appendix A for the plant(s) to be inspected

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

- risk significance of the commitments, using insights gained from sources such as the NRC's "SDP Risk Informed Inspection Notebooks", Revision 2
- extent of previous license renewal audits and inspections of aging management programs
- extent that baseline inspection programs will inspect SSCs or a commodity group
- results of the one-time inspections (e.g., selective leaching inspection) to ensure that either there is no aging effect or the aging effects detected were properly evaluated
- draft license condition(s) to address existing plant issue(s)

Before performing these inspections, the lead inspector will determine the number and nature of proposed license conditions and commitments to be reviewed. The sample should include as many proposed license conditions and commitments, which were identified by the staff during the application review, as inspection resources will allow. The inspection will also include those proposed license conditions and commitments made by the applicant, which were either modified/enhanced or agreed upon by the staff, and selected in accordance with their risk significance.

The inspection team will inspect the proposed license conditions and commitments to the extent necessary to determine that they were implemented as described in the LR-SER and that any modification of commitments was done in accordance with 10 CFR 50.59, "Changes, Tests and Experiments," and established commitment management guidance. The inspection team should determine that there is reasonable assurance that the commitment tracking program is effective.

03.02 Verification of Annual Update. Verify that 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).

03.03 Verification of Inclusion of Newly Identified SSCs in the FSAR Updates. Verify that "newly identified" SSCs are included in the annual FSAR updates as required by 10 CFR 54.37(b) and the guidance provided in RIS 2007-16.

Applicants may identify new SSCs that should be within the scope of its license renewal program at any time. These SSCs are "newly identified" pursuant to 10 CFR 54.37(b), which has been further clarified in RIS 2007-16 as part of NRC generic communications. The NRC may also specify additional newly identified SSCs that one or more holders of renewed licenses must evaluate and include as applicable in its next FSAR update in accordance with 10 CFR 54.37(b).

Inspectors should contact NRR/Division of License Renewal (DLR) staff for (1) information on generic communications that were issued naming newly identified SSCs, or (2) technical assistance in the review of new aging management programs that have been developed by the applicant.

03.04 Review of License Programs. Verify that the applicant's description of the programs and activities for managing the effects of aging are consistent with the FSAR supplement summary descriptions (included in Sections 3 and 4 of the LR-SER).

The updated FSAR (UFSAR) supplement describes the aging management programs and TLAA approved by the NRC in the SER issued with the renewed license. This inspection will also verify that the applicant's aging management program or TLAA being implemented is consistent with the UFSAR description and that changes, caused by the inclusion of "newly identified" SSCs, were included in the UFSAR. If the applicant has not submitted an UFSAR update since implementing the program or TLAA, the inspection team will review the planned UFSAR changes and verify that they are included in an appropriate tracking system.

The inspectors should determine the basis for the removal or addition of SSCs or commodity groups to an aging management program and whether the basis was justified as a part of the annual update.

#### 2516/01-04 REPORTING REQUIREMENTS

The inspector should document the following aspects of the inspection for each inspected area or commitment, as appropriate:

- a. Identify how the inspection was conducted (i.e., the methods of inspection). Methods can include a walkdown, an in-office review, observation of tests, and discussion with plant personnel.
- b. Identify what was inspected. Include sufficient detail on which and how many samples were completed. If more than six documents were reviewed, then list the items in an attachment and reference the attachment in the scope section.
- c. Identify the inspection objectives and the criteria that were used
- d. Report the specific conditions that were not met and the planned completion dates for commitments that have not been completely implemented
- e. Include reference to applicant's corrective action documents that describe issues regarding license renewal commitment implementation to allow follow-up of identified commitment implementation issues in the future.

Issues of concern resulting from this TI shall be documented in an inspection report. An issue of concern in this area is a collection of well-defined observations that raise questions on the applicant's adequate implementation of proposed license conditions, commitment or aging management programs. For the purpose of this TI, issue of

concern only applies to passive components.

Potential safety issues that may involve performance deficiency by the applicant as defined in the NRC Inspection Manual Chapter (IMC) 0612, "Inspection Reports," shall be referred to the site resident inspection staff for follow-up, if needed, and determination of risk significance.

#### 2516/01-05            COMPLETION SCHEDULE

Portions of this TI should be completed during the outage preceding the beginning of the period of extended operation for the purpose of observing or verifying commitments of tests or other activities that require containment entries or access to rooms that would normally be posted as a high-radiation area or higher when the reactor is operating. The remaining portion of this TI can be completed at any other time before the period of extended operation. The team composition and size can vary for the purpose of conducting either the outage or nonoutage portion of this inspection. Also, additional inspection can be performed during the period of extended operation, after the license has been renewed, to follow up on issues identified during previous license renewal inspections. The inspections, with the exception of the followup portion to be conducted once the license is renewed and during the period of extended operation, should be completed by December 31, 2013.

#### 2516/01-06            EXPIRATION

This TI will expire on December 31, 2013.

#### 2516/01-07            CONTACT

For questions regarding performance of this TI or emergent issues, contact Chief, Renewal of Program Operations Branch (RPOB)/DLR/NRR, or Chief, Reactor Inspection Branch/Division of Inspection and Regional Support/NRR. The inspectors should request assistance from NRR technical staff if the visual inspection requires more extensive knowledge of aging effects to a specific structures or component.

#### 2516/01-08            STATISTICAL REPORTING

Direct inspection effort in implementing this TI should be charged to TI 2516-001. An IPE code of LI should be used for all direct inspection effort. An IPE code of LRP should be used for any indirect inspection effort for preparation and/or documentation.

2516/01-09

## RESOURCE ESTIMATES

The inspection resources required to complete this TI are the same as the inspection resources required to complete IP 71003. It has been estimated that this TI will require approximately 2 weeks of inspection time on site involving a team of four inspectors and an inspection lead. An additional week will be allocated each to inspection preparation, in-office review between 2 onsite weeks, and documentation of the inspection results. The team leader will require an additional week of preparation and an additional 2 weeks to finalize the inspection report. Based on these estimates, each inspection will require about 28 inspection weeks. It is estimated that each unit at each site will require an inspection; however, later inspections at multiunit sites may not require the same level of effort as the inspection of the first unit.

Completion of this TI will satisfy completion of IP 71003 inspection requirements. Inspection resources to complete this TI and IP 71003 should not exceed 28 inspection weeks.

2516/01-10

## TRAINING

No formal training is proposed for the performance of this TI. Regions should contact the DLR if they need technical support during the inspection of license renewal commitments.

2516/01-11

## REFERENCES

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

Statement of Consideration published with the revision to 10 CFR Part 54 in the Federal Register, Vol. 60, No. 88, May 8, 1995, pp. 22461 to 22495

Plant-specific license renewal application

SER and Appendix A for the plant(s) to be inspected

END

Attachment 1: Revision History

## Attachment 1

## Revision History for TI 2516/001

Commitment Tracking Number	Issue Date	Description of Change	Training Needed	Training Completion Date	Comment Resolution Accession Number
N/A	ML110620255 03/30/11 CN 11-004	Reviewed commitments and none found for 4 years. New temporary inspection procedure to provide inspection guidance related to verification of license renewal commitments.	No	N/A	N/A