

Changes and Clarifications to Technical Guidance

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Purpose of the Revision

- Consistency with revisions to 10 CFR 50.59 and 10 CFR 50.64(a)(4)
- Clarifications based on operating experience, public workshop input, and consistency with STS
- Combine/update existing guidance in two NRC IMC 9900 documents (Operability; Resolution of Degraded and Nonconforming Conditions); Make documents more process oriented

One Process Oriented Document

Operability Determination Process

- GL 91-18 endorsed two IMC 9900 documents (Operability; Resolution of Degraded Conditions)
- GL 91-18, Rev. 1 (10/97) revised Resolution of Degraded Conditions consistent with 50.59
- Draft guidance combines both documents to eliminate overlapping and potentially confusing guidance. In addition, document was revised to make it more process-oriented.

10 CFR 50.59

Clarifications Made to Reflect Revised 10 CFR 50.59

- Updated language from Operability document for consistency with 50.59
- Updated guidance on corrective actions, licensing basis, and Appendix B.
- Provided discussion and reference to RG 1.187 and NEI 96-07, Rev. 1, with respect to compensatory measures

10 CFR 50.65(a)(4)

Clarifications Made to Address 10 CFR 50.65(a)(4)

- Modified scope from SSCs discussed in the FSAR to SSCs within the scope of the Maintenance Rule
- Included process interface with 10 CFR 50.65(a)(4) in Assistance Navigator flowchart
- Added new Appendix B to discuss operability and process interface for assessment and management of risk during maintenance

Standard Technical Specifications

Clarifications Made to Address STS

- Consistency with STS
 - ▶ Completion Time vice Allowed Outage Time
 - ▶ LCO and SR Applicability
 - ▶ Support System Operability
- Risk-informed STS SR 3.0.3
 - ▶ Operability for missed TS surveillances

Operating Experience/Workshop Inputs

Clarification of Operability/Functionality

- Standard terminology
 - ▶ Operability - TS SSCs and their support SSCs
 - ▶ Functionality - other plant SSCs
 - ▶ Minimize confusion on “Big O/Little O”
- Scope of Guidance
 - ▶ Primarily discusses Operability
 - ▶ Principles considered for Functionality of other SSCs
- Operability/functionality and interface with other processes are illustrated in the draft Assistance Navigator flowchart

Operating Experience/Workshop Inputs

Change to Establish Who Makes the Call

- Who makes the call? Current guidance silent
- Licensed operators - People operating the plant are expected to make the call as to whether the SSCs are operable
- Inputs from other parts of organization dependent on issues

Operating Experience/Workshop Inputs

Changes to Establish Timing of Operability Determinations

- Terminology for timing of Operability Determinations (current guidance silent)
- Immediate - made at the time a potential degraded or nonconforming condition is identified
- Prompt
 - ▶ Usually within 24 hours, including SSCs with CTs \leq 24 hours
 - ▶ May be extended to CTs in TS
 - ▶ Reasonable expectation of operability must exist

Operating Experience/Workshop Inputs

Changes for Alternative Analyses

- Alternate analyses (current guidance silent)
 - ▶ May raise complex plant-specific issues
 - ▶ May be acceptable if consistent with CLB
 - ▶ Not a substitute for license amendment

- Alternate Source Term (AST) (guidance silent)
 - ▶ Incorporates latest guidance from NEI/NRC White Papers to address control room in-leakage testing
 - ▶ AST analytical methods may be used, but must meet current acceptance criteria in the CLB

Operating Experience/Workshop Inputs

Other Clarifications

- **Threshold for Operability**
 - ▶ Reasonable expectation (in current guidance); not absolute assurance
 - ▶ Alternatives considered were reasonable assurance or preponderance of evidence
- **Component reliability**
 - ▶ At some point, repeated failures may make SSCs not reliable (not meeting design assumptions) and should be evaluated for Operability
 - ▶ Maintenance Rule programs not a consistent standard for reliability since focus on maintenance effectiveness