

Industry Comments on NRC §50.69 proposals (9/26/01)

50.69(a)

Add definition of nuclear industrial treatment (slightly modified from workshop slide):

“Practices that provide adequate confidence that required functions will be satisfied under conditions as intended. Such practices are identified through applicable national, local and industry codes and standards, vendor recommendations, or operating experience. Implementation measures are applied commensurate with the relative importance and complexity of the activity, and are accomplished through plant procedures, guidelines, or by skilled personnel. The scope of treatment includes: design control, procurement, installation, inspection, testing, maintenance, assessment, and corrective action.”

§50.69(c)

General

In a performance based rule, the rule should focus on what a licensee must do rather than detailed, “how to” requirements. This draft rule states that a licensee has two options: Adopt Appendix T or use a categorization process that has been approved by the NRC. As such, sub-paragraphs (1) thru (5) could be deleted. If additional details are deemed necessary the following comments apply:

§50.69(c)(1)

CDF and LERF are accepted risk metrics, not core damage prevention and mitigation. Licensees should be provided the flexibility to use a full scope risk assessment rather than a full scope PRA.

§50.69(c)(2)(1)

Appears to be a repeat of (c)(1) above.

§50.69(c)(2)(ii)

Delete from “Determinationto addressing.”

§50.69(c)(2)(iii)

Delete “Consistency with”

Delete “SSC functions....(iv) above. The process described above provides the justification when coupled with the IDP review.

§50.69(c)(3)

Describes how to. Integrated sensitivity studies address potential RISC-3 degradation. See workshop slides.

§50.69(c)(4)

Delete. §50.69 is an application so what is meant by an application? Don't understand the phrase, " if pressure boundary integrity functions are being categorized."

§50.69(c)(5)

See workshop slide – and discussions

§50.69(d)

50.69(1)(ii) & (iii)

Delete and insert the following: "Special treatment controls, including performance or condition monitoring, are applied to RISC-1 and RISC-2 SSCs sufficient to provide reasonable assurance that the safety significant functions are satisfied."

50.69(d)(2)

Modify to state: "For SSCs that perform RISC-3 and RISC-4 functions:"

50.69(d)(2)(i)

Modify to state: "...to apply to RISC-3 and RISC-4 SSCs, ..."

50.69(d)(2)(ii) and (iii) and (3)

Delete and insert the following:

"The licensee shall use nuclear industrial treatment practices (see definition in 50.69(a)) to provide adequate confidence that design bases functions are maintained."

50.69(e)

Modify to state: "The following requirements are not applicable to RISC-3 or RISC-4 SSCs:"

1. 10 CFR Part 21
2. §50.44c ...list all the regulations listed in (e)(2)
3. §50.49
4. §50.55a
5. §50.55e
6. 50.65(a)1,2,3
7. §50.72
8. §50.73
9. The Type B and Type C testing requirements of Appendix J to 10 CFR 50 for both Options A and B (i and ii are redundant to categorization guidance).
10. Appendix A to Part 100 in regard to engineering design & testing.
11. 10 CFR Part 54

§50.69(f)

50.69(1)

Delete all references to license amendment. Modify to read as follows:

Unless implementing the requirements of Appendix T, a licensee shall submit the following information for NRC review prior to making any change in the application of NRC special treatment requirements permitted by this section.

(ii) Reference to or description of categorization methodology with a listing of any exceptions from NRC approved methods and a description of the alternative categorization method(s).

(iii) Reference to or description of the measures taken to assure that the quality of the PRA used in the categorization process is commensurate with the application

(vi) Delete

(vii) Incorporate into (ii)

§50.69(g) We believe the existing regulatory change control processes are sufficient. Categorization process being controlled through the commitment management process, and the §50.54(a) process controls changes to the industrial QA program description. A reduction in commitment is the elimination of one of the elements listed in the rule.

As such, §50.69(g) could be deleted.

50.69(h)

§50.69(h)(1)

The rule only needs to reference the need for program summary of industrial controls for RISC-3 SSCs.

§50.69(h)(2)

Delete – no need to be in a rule

§50.69(h)(4)

add RISC-1 and RISC-2 *safety-significant* function. Need to add language that is consistent with the existing §50.73, *see language in the workshop slide*.