

Telephone Conference Call Summary

Graded Management Measures on Items Relied On For Safety

DATE AND TIME

January 11, 2012, at 9:00 A.M. (Eastern)

CALL PARTICIPANTS

NRC

Christopher Tripp

Christopher Ryder

Westinghouse

Gerard Couture

Carl Snyder

Mark Rosser

SUMMARY

Christopher Ryder stated that the discussion is for information purposes only and should not be taken to imply the outcome of the U.S. Nuclear Regulatory Commission (NRC) staff's review of a future application for a license amendment.

The licensee discussed the use of graded management measure to ensure that items relied on for safety (IROFS) can perform their intended safety function. Currently, the licensee ensures that all IROFS can perform their intended safety function by inspecting and measuring IROFS, even those that do not change. Christopher Ryder stated several examples that he learned of during a site visit—the depth of fuel rod channels and the spacing of shelves for storing the channels do not change, but are still measured annually. Carl Snyder mentioned other examples where hundreds of measurements of passive components are taken to verify that the components have not changed. Gerard Couture stated that such efforts are distracting plant staff from focusing on issues that has significant safety concerns; he has heard of comments from production staff to that effect.

Gerard Couture stated that the annual verification of IROFS is a license commitment that was intended to focus attention on IROFS that can readily change, such as active and administrative IROFS, not passive IROFS. If the vendor of an IROFS recommends; for example, calibrating a sensor, or verifying an interlock on a semi-annual basis, then Westinghouse has the practice of performing the verification on the more restrictive basis. The annual interval is a default period.

Carl Snyder inquired about defining "safety boundaries" on sole-IROFS such that minor changes would not require preapproval by NRC. Christopher Tripp stated that the concern of the NRC staff is the safety-function, not minor changes that have no relevance to the safety function.

Christopher Tripp stated if an item, a component or an administrative action, is being relied on for safety, the item must be an IROFS. Given that the item is an IROFS, by regulation, the licensee must ensure that the item is capable of performing its intended safety function. The "annual" assurance is a commitment in the license application, not the regulations. The licensee can request a change in the commitment with an application to amend the license.

Enclosure

Christopher Tripp explained that the regulations do not prevent a licensee from categorizing IROFS, such as into active and passive IROFS and applying management measures accordingly to ensure that the IROFS can function as intended. There is no regulatory requirement that passive IROFS have to be measured each year. The license application may have a general commitment stating that the licensee will perform a surveillance walk-down of the entire facility every one or two years to assess that all aspects of the facility appear to be in their intended place. If safety aspects of passive IROFS have a distinctive physical safety margin, the licensee may be able to use the margin to justify that a visual assessment is sufficient to ensure that the IROFS can perform its intended safety margin. For example, if the fuel channel has a height of four inches to control criticality, but the height at which criticality would occur is several inches higher, the licensee may be able to justify that the 4-inch height can be assured observation instead of measurement.

For passive IROFS that are subjected to corrosion (for example, the wall thickness of a vessel), measurements would still be necessary. With data and experience, the licensee may be able to justify a period between measurements that is longer than one year.

PRINCIPAL CONTRIBUTOR

Christopher Ryder