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To: [Naquin, Tyrone](#)
Subject: [External_Sender] GNF-A SNM 1097 Chapter Updates - Additional Information
Date: Friday, November 06, 2015 12:26:07 PM

From the Standing Application, Chapter 11. Section 11.2.1

The configuration management (CM) program ensures that the information used to operate and maintain safety controls is kept current. Safety controls are systems, structures, components and procedures that prevent and/or mitigate the risk of accidents.

Your request is to eliminate the second sentence. What was the basis for that? And if the sentence didn't define 'safety controls' the way you would prefer, what am I to think of the term 'safety controls,' in the first sentence? As a reviewer, I'm led to believe that you felt compelled to remove the definition as it is in the standing app. So, what are safety controls?

In our review of Chapter 11, there were a couple of issues identified with the second sentence in section 11.2.1. First, the term safety control is meant to have the same definition as IROFS; however, configuration management applies to all safety controls, but not all safety controls are IROFS – for example there are additional controls in a criticality analyses or for fire code requirements (e.g. sprinkler systems) that are not listed as IROFS). Second, the current sentence gives a description of "safety controls" that is slightly narrower than the 10CFR70.4 IROFS definition ("structures, systems, equipment, components and activities of personnel that are relied on to prevent ... or mitigate potential accidents or consequences). To avoid confusion, we felt there was not a need in the Configuration Management section of Chapter 11 to define safety controls more narrowly than the IROFS regulatory definition.

From the Standing Application, 11.6.1

Criticality and radiological audits are performed quarterly (at intervals not to exceed 110 days) under the direction of the manager of the criticality safety function and the manager of the radiation safety function.

Your suggested Revision:

Criticality and radiological audits are performed periodically, in accordance with documented, approved practices, such that all applicable process and support areas will be audited at least every two (2) years.

I don't have so much question about your change request, but I would point out this, under Reason For Change:

You cite alignment with the 1520, Section 5.4.3.2, page 5-11. I wanted to point out that you are referencing Rev 1 of the 1520. Rev 2 was issued in June and does not use this language. I would like a clarification, in email with an appropriate citation from the current 1520.

The change table reference was not updated when NUREG 1520 Revision 2 was issued. The correct reference from NUREG 1520, Revision 2 is Section 5.4.3.1.6 (2) on page 5-12.