

**FAQ 14-04 (Final)**  
**Definition of Concurrent Failures**

**Plant:** Generic

**Date of Event:** NA

**Submittal Date:** July 16, 2014

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**Performance Indicator:** OR01, Occupational Exposure Control Effectiveness

**Site-Specific FAQ (Appendix D)?** No

**FAQ requested to become effective:** When approved.

**Question Section**

**NEI 99-02 Guidance needing interpretation (include page and line citation):**

*Rev. 7, "Clean" copy, page 64, footnote 14 below line 40:*

14 "Concurrent" means that the nonconformances occur as a result of the same cause and in a common timeframe.

**Event or circumstances requiring guidance interpretation:**

The resolution of Reaction Oversight Process FAQ 12-04 required development of a revision to a footnote in the section on Occupational Exposure Control Effectiveness (OR01). In Revision 7 of NEI 99-02, the crucial footnote is number 14 on page 66 of the line-in/line-out version, which reads as follows:

"Concurrent" means that the nonconformances occur as a result of the same cause and in a common timeframe."

**What is the NRC resident inspector's position?**

NA. This FAQ implements a White Paper approved by the ROP Working Group.

**Potentially relevant existing FAQ numbers**

FAQ 12-04 was the trigger for the White Paper.

**Response Section**

**Proposed Resolution of FAQ:**

See approved new wording below.

**If appropriate, provide proposed rewording of guidance for inclusion in the next revision:**

As a result of numerous discussions on the meaning and original intent of "concurrent nonconformances" during the resolution of FAQ 12-04, the following is the proposed new text of Footnote 14:

"Concurrent" means that the nonconformances occur as a result of the same cause and in a common timeframe. **Failing to take reasonable action that would end a nonconformance when new information (i.e., a survey indicates, or a knowledgeable individual finds evidence of, unidentified or unexpected radiological conditions) is presented, is itself a new and separate cause for the subsequent (or continued) Tech. Spec. nonconformance, and would not be concurrent with the original Technical Specification High Radiation Area Occurrence.**"

**Is a PRA update required to implement this FAQ?**

No

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**Is an MSPI Basis Document update required to implement this FAQ?**

No

**NRC Response**

This FAQ incorporates the definition of “concurrent failures” approved by the ROP Working Group through the white paper on the definition of “concurrent failures” (ADAMS Accession No. ML14041A251). The final approved wording of the change in NEI 99-02, Rev. 7, to implement the White Paper is as follows:

Footnote 14: “Concurrent” means that the nonconformances occur as a result of the same cause and in a common timeframe. **Failing to take an action that would have reasonably ended a nonconformance is itself a new and separate cause for the subsequent (or continued) Technical Specification nonconformance and would not be concurrent with the original Technical Specification High Radiation Area Occurrence. Actions that would reasonably end a nonconformance include performing a plant procedure (e.g., a radiation survey, or a verification that Locked High Radiation Area is locked) that would have identified the plant condition, or responding in a timely manner to new information (e.g., the results of a radiation survey, or evidence of the nonconforming radiological condition that is identified by a knowledgeable individual) that indicates the nonconformance.**