

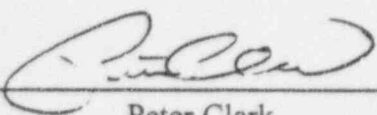


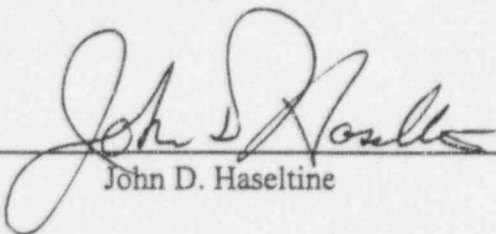
# Connecticut Yankee Decommissioning

## System Reclassification

GRPI

Revision 0

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#### Goals:

The goal of this effort is to provide a method for reclassifying systems from QA Category 1 to non-QA and/or augmented QA category. This GRPI is being developed in support of the Integrated Plan for Initial Decommissioning of Connecticut Yankee dated November 25, 1996.

#### Roles:

The roles and responsibilities for personnel associated with system reclassification are as follows;

- The Engineering Director will assign a Cognizant Engineer who will be responsible or the overall coordination of the reclassification of systems.
- The Cognizant Engineer will be responsible for the development of procedures and guidelines for reclassifying system.
- The Cognizant Engineer will coordinate the reclassification process and will maintain the database of reclassified systems.
- The Cognizant Engineer will solicit support from Engineering, Licensing, Safety Analysis and Operation on reclassifying systems.
- Licensing and Safety Analysis will provide design basis input (PSDAR, UFSAR, Technical Specification, Security Plan, QA Topical) which will be factored into the process and procedures for reclassifying system.
- Design Engineering will process system reclassification evaluations.
- Operations will oversee the results of Design Engineering's system reclassification evaluations.

#### Process:

The decommissioning activities that are tied to system reclassification are decommissioning cost estimate, PSDAR, UFSAR. Technical Specification, Security Plan, QA Topical, nuclear island design specification and DCM. The process for reclassifying system must consider all of these activities.

The system reclassification process will be developed using ANSI/ANS 51.1 *Nuclear Safety Criteria for the Design of Stationary Pressurized Water Reactor Plant* as a guide for reclassifying systems. This instruction applicable to in-service nuclear plants and the that applicable portions of the ANSI Standard will be adapted for the decommissioning process.

The initial phase of the reclassification process will consist of a series of team meetings to solicit input into reclassification and discuss the process and procedures that will be developed. These meeting will evaluate the following;

- Benefits associated with system reclassification and the schedule for performing the reclassification, i.e. now versus a year from now.
- The method, i.e. processes and procedures, that will be used for reclassifying systems.
- Licensing restraints associated with reclassification, i.e. can system reclassification occur prior to the revising and issuing the UFSAR, Technical Specification, Security Plan, QA Topical and PSDAR?

The current method of classifying system is the MEPL Program. However, the program is a complex program that was designed for in-service nuclear power plants and this process may not be appropriate for the decommissioned mode. The team will have to evaluate and determine if there are other options or processes that could be used for reclassifying systems. One possible process that has been mentioned is WCM 2.2-11, Disposition of Infrequently Used and Abandoned Equipment. The abandon equipment process is currently being used to identify systems that are not needed for decommissioning. This process could be modified for system reclassification. Another option that may also exist for system reclassification is the DCM revision that is being prepared to address nuclear plant decommissioning. The DCM revision could be adapted to address system reclassification.

#### **Interpersonal Relations:**

The process and procedures that are developed for reclassification of system will be integrated with the 16 major deliverables as identified in the Integrated Plan for Initial Decommissioning of Connecticut Yankee. The interpersonal relations that are associated with the reclassification of systems will involve the interaction with a number of groups and individuals that are outside of CY Engineering, Licensing and Operations organizations. These groups include;

- Engineering Programs support maybe required for input into the revised program for performing system reclassification evaluations.
- The nuclear island design specification and DCM revision must address the classification of new systems and the reclassification of obsolete systems.
- The reclassification of systems will involve a working relationship with Yankee personnel who have worked on similar areas for the Rowe decommissioning. Efforts will be taken to learn from Yankee's experiences.
- This effort will also consider "Industry Experience" for guidelines into reclassifying system. Nuclear Information Network Inquiries TI-17-12 and DE-7077 are currently posted and are requesting industry information, procedures and guidelines on reclassifying systems.
- The reclassification of systems will also need to consider "Systems needed for Decommissioning" and the status of those systems during various stages of decommissioning. The Cognizant Engineer that is assigned responsibility for identifying and maintaining a list of the "Systems needed for Decommissioning" will become closely involved in the reclassification process.

Revision 0 dated December 30, 1996