Summary of Changes to IMC 0609 Appendix A, "The Significance Determination Process for Findings At-Power," and its basis, IMC 0308 Attachment 3 Appendix A

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U.S.NRC
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Basis Document Changes

- Added a basis for each of the screening questions in IMC 0609 Appendix A.
- The basis for each question was created based on past Significance Determination Process (SDP) experience and the expert judgement of the Senior Reactor Analysts and Risk Analysts.
- Some simple risk assessments were performed to confirm the expert judgment.

At-Power SDP Changes

- Added direction to perform a peer review for Green detailed risk evaluations (DREs).
- Added background information consistent with the basis document for any of the screening questions that did not have additional guidance.
- Revised the LOCA initiator screening question.
- Added a new question about fuel handling errors over the core to align with changes to 0609 Att 4.
- Combined and revised the FLEX screening questions.

LOCA Initiators

Revised Exhibit 1, Question A.2 as follows:

After a reasonable assessment of degradation, could the finding have likely affected other systems used to mitigate a LOCA (e.g., Interfacing System LOCA)~~,~~ ~~resulting in a total loss of their function~~?

- a. If YES ➛ Stop. Go to Detailed Risk Evaluation section.
- b. If NO, screen as Green.

Fuel Handling Errors

New question A.4 added to Exhibit 3:

Did the finding result from fuel handling errors, a dropped fuel assembly, a misplaced fuel bundle, or crane operations over the core or anywhere in the refueling pathway that challenged fuel cladding integrity or resulted in a release of radionuclides?

- a. If YES ➛ Stop. Go to IMC 0609, Appendix M.
- b. If NO, screen as Green.

FLEX Screening Questions

- Revised question about spent fuel pool instrumentation and containment venting to add reference to 10 CFR 50.155.
- Consolidated 2 remaining questions into 1 and revised the wording.
- Existing FLEX question on equipment:

  Does the inspection finding involve a failure, unavailability, or degradation of equipment credited for use in satisfying the requirements of Order EA-12-049 that would result in a complete *loss of the ability to maintain or restore core cooling or containment capabilities* for an exposure period greater than the out of service time allowed in the licensee's FLEX final integrated plan?

New FLEX Question

Does the inspection finding involve equipment, training, procedures, and/or other programmatic aspects credited in any Phase 1 or 2 FLEX strategy such that any FLEX function (such as extended HPCI/RCIC/AFW operation, providing FLEX DC power, FLEX AC power, or FLEX RCS feed) could not be completed in accordance with existing plant procedures within the time allotted for an exposure period of greater than 21 days?

a. If YES ➛ Stop. Go to Detailed Risk Evaluation section.

b. If NO, screen as Green.