

## Items Associated with Performance of IP 37060 that May Benefit from Potential Enhancements

Working group milestones associated with enhancement of IP 37060 can be found in the Charter (ADAMS Accession No. ML20182A687). Next step in working group activities is to develop draft recommendations utilizing below list. Draft recommendations to be developed by the end of February 2021. Working group members should ensure that any draft recommendations do not have the potential to impose any new or different positions on how to meet the provisions of 10 CFR 50.69.

### When to Perform Inspection

- Evaluate if 10 CFR 50.69 Federal Register Notice [69 FR 68008] oversight considerations are met.
- Evaluate relocation of IP 37060 requirements to ROP Baseline.
- Evaluate the sequencing and timing of performing the initial inspection.
  - Consider two inspection activities (i.e. early inspection of licensee program and later inspection of how program implemented).
  - If one inspection activity maintained, consider timing of inspection after licensee adoption of 10 CFR 50.69.
- Evaluate when performance of additional inspections is warranted.
  - Consider ROP principles (i.e. conducting IP for performance issues, events, etc.).

### Inspection Requirements

- Evaluate inspection requirements for completion of the IP (i.e. create distinct requirement and guidance sections).
  - Consider requirement to verify that PRA model changes are appropriate.
  - Consider requirement to verify that common cause concerns are evaluated.
  - Consider requirement to review Corrective Action Program.
- Evaluate SSCs for sample selection.
  - Consider SSC performance, risk-significance, etc.

### Inspection Guidance

- Evaluate if additional guidance is warranted for the SSC categorization process.
  - Consider quantitative vs qualitative inputs into the categorization process.
  - Consider categorization for SSCs that interface with multiple systems but may not be within system boundaries (e.g. main steam bypass valves, pipe supports, etc.).
  - Consider passive component categorization.
  - Consider SSC categorization impact on pre-existing commitments.
- Evaluate if additional guidance is warranted for SSC treatment.
  - Consider RISC-1 & RISC-2 performance criteria.
  - Consider what is adequate RISC-3 alternate treatment (i.e. operations, procurements, functionality).
  - Consider RISC-3 piping treatment and replacement.
  - Consider welding criteria (including technician qualifications) for RISC-3 SSCs.
  - Consider operation leakage criteria.
  - Consider reference to industry documents / standards that discuss alternate treatment.

- Evaluate if additional guidance is warranted in other areas.
  - Consider event reporting per 10 CFR 50.69(g).
  - Consider adding a document request example letter as an enclosure to IP 37060 similar to one previously found in IP 71111.05T, Fire Protection (Triennial) (ADAMS Accession No. ML12328A158).

#### Training and Qualifications

- Evaluate if additional training is warranted.
  - Consider training for passive component categorization methods.
  - Consider if examples of actual implementation at sites may be beneficial.
- Evaluate if revision to inspector qualifications is warranted.

#### Inspection Team

- Evaluate inspection team member composition.
  - Consider qualifications of team members.
  - Consider knowledge of passive component categorization methods.
  - Consider experience with prior IP 37060 inspections.

#### Resource Estimates

- Evaluate if resource estimate needs to be adjusted.
  - Consider impact from any proposed recommendations to performance of inspection.
  - Consider revising resource estimate discussion to be similar to language found in other IPs (i.e. list total hours for direct inspection effort vice current FTE).

#### Other

- Evaluate if additional examples warranted for IMC 0612, Appendix E, “Examples of Minor Issues” (ADAMS Accession No. ML19247C385).