NRC FORM 658
(9-1999)

U.S. NUCLEAR REGULATORY COMMISSION

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DATE OF MEETING
**04/04/2001**

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| | |
|---|---|
| Docket Number(s) | **05000498, 05000499** |
| Plant/Facility Name | **South Texas Project, Units 1 and 2** |
| TAC Number(s) (if available) | **MA6057, MA6058** |
| Reference Meeting Notice | **Dated 3/23/01** |
| Purpose of Meeting (copy from meeting notice) | **To discuss the NRC's draft Safety Evaluation on the risk-informed multipart exemption request to the special treatment requirements in 10CFR Parts21, 50, and 100.** |

| NAME OF PERSON WHO ISSUED MEETING NOTICE | TITLE |
|---|---|
| **John A. Nakoski** | **Senior Project Manager** |

OFFICE
**NRR**

DIVISION
**DLPM**

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**PDIV-1**

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# AGENDA

WEDNESDAY, APRIL 4, 2001
**Room OWFN - 10B4**

| | |
|---|---|
| 8:00am - 8:05am | Introduction and Opening Remarks |
| 8:05am - 9:00am | Open Item 3.4, Containment Integrity |
| 9:00am - 10:00am | Open Item 3.5, Passive Pressure Boundary Function |
| 10:00am - 10:15am | Break |
| 10:15am - 12:00pm | NRC Comments on STPNOC's Proposed FSAR Section |
| 12:00pm - 1:00pm | Lunch |
| 1:00pm - 3:00pm | Status of Remaining Treatment Open Items (4.2, 8.1, 11.1, 18.1)<br>Considering NRC Comments on Proposed FSAR (Note: Open Items 10.1 and 10.2 will not be discussed - require licensee response) |
| 3:00pm | Meeting Ends |
| 3:00pm - 5:00pm | STPNOC uses room to consider NRC comments to Proposed FSAR |

THURSDAY, APRIL 5, 2001
**Room TWFN - 8A1**

| | |
|---|---|
| 8:00am - 8:05am | Opening Comments |
| 8:05am - 10:30am | Recap Discussions from April 4, 2001<br>Feedback from STPNOC on NRC Comments to Proposed FSAR |
| 10:30am - 10:45am | Break |
| 10:45am - 11:30am | Open Item 5.1, Change Control |
| 11:30am - 12:30pm | Lunch |

**Room OWFN - 9B4**

| | |
|---|---|
| 12:30pm - 4:00pm | Positions to be Presented to ACRS on Resolution of Treatment Open Items (Open Items 4.2, 7.1, 8.1, 10.1, 10.2, 11.1, 13.1, 18.1) |

## Draft Response
## Component Categorization with respect to Late Containment Failure

The STP PRA model describes containment response to a core damage event using four different containment response categories. One of the categories is Late Containment Failure, which makes up approximately 9% of all the containment responses to a core-damaging event. Late Containment Failure is defined as containment failure that occurs 4 hours after vessel breach and is dominated by station blackout scenarios. Approximately 77% of all Late Containment Failures are due to station blackout scenarios.

Most of the important components associated with mitigating Late Containment Failure are also those components that mitigate the station blackout itself. SSCs in the electrical distribution systems are particularly important in mitigating station blackout consequences as well as in recovery actions to restore electric power. Since station blackout scenarios are so important, other SSCs like containment spray and reactor containment fan coolers do not play an important role in mitigating Late Containment Failure. Failure to restore electric power from a station blackout event presumes there will be no SSCs (i.e., containment spray and reactor containment fan coolers will not be available) to mitigate the event, and thus results in late containment overpressurization. This assertion is supported by a component risk ranking analysis based solely on Late Containment Failure scenarios. The results of the analysis demonstrated that there was no change to the risk ranking of any component that has undergone the categorization process.

The following table provides a list of components whose categorization could have been further evaluated based on their contribution to late containment failure. However, there are several important items to note with respect to these components which would have resulted in their being initially properly categorized in the following table.

1. Neither of the systems shown below containing these components has gone through the categorization process. These systems are the 4.16kV AC Class 1E Power (PK) and the 480V AC Class 1E MCC and Distribution Panels (PL).
2. Non-symmetry in the ranking (i.e., Components in train A do not equal train B and/or train C) is due asymmetries in electrical loads and modeling assumptions. All corresponding components in the other trains are already ranked "high" by the PRA. In each case of non-symmetry the lower ranked component is just below the cutoff threshold while the higher ranked component is just above the cutoff threshold.
3. If these components had gone through the categorization process each of the components below would have been ranked "high" for symmetry reasons. Note, all of the components in the table below are breakers in the class 1E power supply system.

| UNIT 1 TAG/TPNS | System | SERVICE_DESC | Curren | Late Containment Contribution | | |
|---|---|---|---|---|---|---|
| | | | | Rank | RAW | FV |
| A1PKSG0E1A11 | PK | 4160V SWITCHGEAR E1A CUB 11 | M | H | 7.49 | 1.36E-02 |
| A1PKSG0E1A4 | PK | 4160V SWITCHGEAR E1A CUB 4 | M | H | 7.49 | 1.36E-02 |
| A1PKSG0E1A7 | PK | 4160V SWITCHGEAR E1A CUB 7 | M | H | 7.49 | 1.36E-02 |
| A1PLSG0E1A3A | PL | 480V LC E1A CUB 3A | M | H | 4.86 | 6.53E-03 |
| B1PLSG0E1B2E | PL | 480V LC E1B CUB 2E | M | H | 4.37 | 1.36E-02 |
| B1PLSG0E1B4F | PL | 480V LC E1B CUB 4F | M | H | 7.18 | 5.21E-03 |
| C1PLSG0E1C4D | PL | 480V LC E1C CUB 4D | M | H | 8.89 | 6.67E-03 |

The above breakers are important for accident mitigation, not only for providing electrical power, but also for opening in response to a sequencer actuation. The PRA model assumes that if any necessary breakers do not open, then the function of supplying electrical power is lost. Recovery of this event is not credited in the PRA. Therefore, these breakers are important for accident sequences that involve station blackout scenarios.

The overall conclusion of this analysis is that ranking based on late containment failure would not provide any additional information or insight to the categorization process.

Attachment 1

**Open Item 3.5**: STPNOC needs to provide sufficient risk-informed justification for application of the categorization process to passive functions (i.e., structural integrity, pressure boundary) of safety-related SSCs. For example, the staff has determined that the categorization process is not sufficiently robust to support the requested exemption from ASME Section XI Inservice Inspection requirements.

**Response:**

STPNOC has two risk-informed categorization processes applicable to the pressure boundary and structural integrity functions of SSCs. The first categorization process is the process described in STPNOC's exemption request for plant SSCs. The second is a risk ranking process established in conjunction with the NRC-approved relief request for risk-informed inservice inspection (RI-ISI) for ASME Class 1 piping under NRC Regulatory Guide 1.178, "An Approach for Plant-Specific Risk-Informed Decisionmaking: Inservice Inspection of Piping,"

The RI-ISI risk ranking process is based upon the EPRI methodology for RI-ISI. STPNOC has recently submitted a similar relief request based on this EPRI methodology for risk informing the ISI program for Class 1 socket welded piping and Class 2 piping under Regulatory Guide 1.178. STPNOC currently has no plans to submit a relief request for RI-ISI for Class 3 components.

STPNOC has conservatively categorized the pressure boundary functions of systems under its exemption categorization process. As evidence of the robustness of the exemption categorization process as applied to pressure boundary, STPNOC notes that, based on the categorizations performed to date, the following systems or portions of these systems (as well as the applicable components) are categorized as MSS or HSS for functions related to pressure boundary.

- Chemical & Volume Control
- Air starting system for the Standby Diesel Generator
- Lube oil system for the Standby Diesel Generator
- Feedwater
- Main Steam
- Reactor Coolant
- Residual Heat Removal
- Safety Injection
- Steam Generator Blowdown

Based upon its RI-ISI risk ranking process for ASME Class 1 and 2 piping, STPNOC is proposing two different approaches with respect to its exemption request to exclude LSS and NRS components from the scope of the ISI examination requirements in 10CFR 50.55a(g), depending upon whether the component is Class 1 or 2 or whether it is Class 3.

<u>STPNOC's Proposed Exemption for ASME Class 1 and 2 Components and Supports</u>

For the exemption request with respect to ISI for Class 1 and 2 components, STPNOC proposes to use the higher of the RI-ISI risk ranking or the categorization determined by the exemption process for the pressure boundary function. In cases where the RI-ISI ranking is Low and the GQA pressure boundary categorization is Low or NRS, the component would be subject to the exemption from the ISI examination requirements in 10CFR50.55a(g). In cases where either is medium or higher, the component would not be subject to the exemption from the ISI examination requirements in 10CFR50.55a(g). Instead, the component would be subject to either the RI-ISI program, based upon its risk ranking under that program, and/or the ISI examinations under the STPNOC ISI program.

STPNOC notes that its RI-ISI risk ranking process only applies to piping. For purpose of the exemption from the ISI examination requirements in 10CFR50.55a(g) with respect to other components, STPNOC will assign those components a pressure boundary risk that is the same as the risk ranking for the associated section of piping as described above. This methodology is consistent with STPNOC and industry experience that the consequences of pressure boundary failure and the potential degradation mechanisms for components other than piping are the same or less severe than that of the associated piping.

The following matrix summarizes STP's proposal with respect to ISI for ASME Class 1 and 2 components:

| | | **GQA Pressure Boundary Categorization** | |
|---|---|---|---|
| | | **HSS/MSS** | **LSS/NRS** |
| RI-ISI **Risk Rank** | High or Medium | The component is not subject to the exemption from ISI examination requirements in 10CFR50.55a(g). Piping is subject to RI-ISI, with a risk rank of high or medium, as applicable. Other components are subject to ISI in accordance with the STPNOC ISI program. | The component is not subject to the exemption from ISI examination requirements in 10CFR50.55a(g). Piping is subject to RI-ISI, with a risk rank of high or medium, as applicable. Other components are subject to ISI in accordance with the STPNOC ISI program. |
| | Low | The component is not subject to the exemption from ISI examination requirements in 10CFR50.55a(g). Piping is subject to RI-ISI, with a risk rank of low. Other components are subject to ISI in accordance with the STPNOC ISI program. | The component is subject to the exemption from ISI examination requirements in 10CFR50.55a(g) and is outside the scope of ISI. |

Since NRC has already determined that the RI-ISI process is sufficiently robust for risk ranking of passive functions (i.e., structural integrity and pressure boundary), and since STPNOC is not proposing (for purposes of the exemption) to categorize piping lower than its RI-ISI risk ranking, there is a sufficient technical justification for STPNOC's proposal to exclude LSS/NRS Class 1 and 2 piping (and supports) and its associated components (and supports) from the scope of the ISI examination requirements in 10CFR50.55a(g) to the extent that they have been risk ranked as low under the RI-ISI program.

STPNOC has performed a comparison of the RI-ISI risk ranking (based on EPRI methodology for RI-ISI) of Class 1 and Class 2 piping against the categorization for the pressure boundary function as determined by the exemption categorization process for the associated systems.

Results show that, with one exception, piping that is LSS or NRS under the exemption categorization process is also risk ranked as low under the RI-ISI methodology. The one exception is on the Auxiliary Feedwater (AFW) system, where portions of the piping are assigned an RI-ISI risk of medium compared to LSS as determined by the exemption categorization process. As indicated by the above matrix, those portions of the AFW system will not be subject to the exemption from the ISI examination requirements in 10CFR50.55a(g).

STPNOC also notes that, to date, it has not categorized the piping under the categorization process described in the exemption request. Until such time as the NRC approves the exemption request and piping is categorized under both processes, the piping (and supports) and its associated components (and supports) will remain under the scope of Section XI or RI-ISI, as applicable - - i.e., it will not be removed from the scope of ISI under 10CFR50.55a(g).

In order to provide additional assurance for Low or NRS systems, STPNOC will perform periodic system pressure tests, up to and including the Section XI equivalent tests. These tests will be performed on systems whose components have been ranked as Low or NRS, based on the higher of the RI-ISI program or the GQA pressure boundary categorization, as described above. Such tests will ensure that the systems are fully intact and that sufficient safety margin is maintained.

Thus, from a risk-informed perspective, STPNOC concludes that combining the exemption categorization process and the RI-ISI risk ranking process adequately evaluates the safety significance of the passive functions, such as pressure boundary and structural integrity, of Class 1 and 2 piping and its associated components.

<u>STPNOC's Proposed Exemption for ASME Class 3 Components and Supports</u>

As discussed above, STPNOC is not planning to request relief to extend its RI-ISI risk ranking process to ASME Class 3 components. Therefore, STPNOC cannot use the above matrix for Class 3 components. Instead, STPNOC is proposing that Class 3 components subject to ISI examination requirements in 10CFR50.55a(g) continue to meet these requirements, regardless of their GQA pressure boundary category, until the following evaluation is completed. This evaluation will consist of an abbreviated RI-ISI type analysis and a comparison of the results to the GQA pressure boundary categorization, as detailed below:

1) An evaluation of the probability and spatial effects consequences of pipe rupture would be performed as follows:

    a) For probability determinations, the evaluation would consider the extent to which degradation mechanisms exist that could result in rupture of the piping. Such degradation mechanisms include thermal fatigue, erosion-cavitation, corrosion, and stress corrosion. Water hammer would not be considered as it is not a degradation mechanism and would not be amenable to prevention through timely inspection.

    b) For spatial effects consequences, STPNOC would take advantage of studies already conducted for areas containing Class 2 piping. The components in those areas were assumed to fail due to flooding from rupture of the Class 2 piping. Based on failure of these components, the consequences on core damage from flooding of each area were determined. Class 3 components subject to ISI examination requirements and located in these areas would be assigned the same consequence category. Any areas containing Class 3 components subject to ISI examination requirements and that have not been previously evaluated would undergo an evaluation to determine the appropriate consequence. Class 3 components inside containment are excluded from this evaluation because components inside containment are designed to operate in a harsh environment and any spatial effects from postulated ruptures of Class 3 components inside containment are already bounded by existing analyses.

c) The probability and consequence evaluations above would be combined to determine a risk rank for the component, as was done under the RI-ISI program.

2) The results of the evaluation in 1(c) would be compared to the GQA pressure boundary categorization and the higher of the two used as the risk for ISI examination requirements.

3) Class 3 components categorized as Medium or High in (2) would not be exempt from the ISI examination requirements in 10CFR50.55a(g). Class 3 components categorized as Low would be exempt from these requirements. Class 3 components subject to ISI examination requirements that have not been assigned a risk in accordance with the process described in (1) above would continue to meet these requirements.

4) In order to provide additional assurance for Low or NRS systems, STPNOC will perform periodic system pressure tests, up to and including the Section XI equivalent tests. These tests will be performed on Class 3 systems whose components have been ranked as Low or NRS, based on the risk results in (2) above. Such tests will ensure that the systems are fully intact and that sufficient safety margin is maintained.

Not withstanding the specific ISI-related evaluations discussed above, STPNOC provides the following additional justification to support our position that the categorization process is sufficiently robust to support its application to passive functions for Class 3 components, given their lower safety significance.

STPNOC's categorization process evaluates the risk significance of individual SSCs using PRA insights and deterministic insights. All SSCs undergo the deterministic review process, and those SSCs modeled in the PRA also undergo the PRA categorization process. In the deterministic categorization process, the pressure boundary function is explicitly categorized. For each fluid system that has been reviewed under this process, the system function of maintaining pressure boundary has been evaluated for risk significance by the GQA Working Group using the process described in the exemption request. This process includes the assessment of the five critical questions. SSCs whose failure could compromise the pressure boundary function were then assigned the same category as the function.

As detailed in the description of the deterministic process, the critical questions are answered based on the impact and probability of the failure. Operational and historical data has shown that passive failures occur much less frequently than active failures. For example, EPRI report TR-110381, Risk-Based Snubber Inspection and Testing Guidelines, which was referenced in our response to RAI 19, states that dynamic testing has demonstrated that, structurally, ASME-designed valves and piping are inherently robust. This is consistent with historical data and indicates that catastrophic passive failures of ASME systems are highly unlikely. Pressure boundary failures are typically evidenced by small leaks that can quickly be detected, mitigated, and corrected. In addition, EPRI report TR-111880, Piping System Failure Rates and Rupture Frequencies for Use in Risk-Informed In-service Inspection Applications, provides experience data and conclusions that support STPNOC's evaluation of the risk significance of pressure boundary. The low probability of rupture of piping components was taken into account during the categorization of the pressure boundary function and its supporting components.

Class 3 components in systems or portions of systems where the pressure boundary function was categorized as LSS are typically not classified as high energy. For such components, credible leakage would not have a significant impact on system or plant operation. Typically, there are means for make-up to the system. Additionally, reliability in this area has been good. Component pressure boundary failures, when they occur, exhibit themselves primarily as leaks rather than ruptures. These leaks would quickly become evident during routine operator rounds, system engineer walkdowns, or other visual or system performance indication. The probability of component rupture in an ASME Class 3 system is very unlikely, and the probability of such a rupture occurring at the same time as a safety system being demanded to support accident or transient mitigation is even more remote and is not credible. Therefore, there is a sound basis for categorizing the pressure boundary function of most Class 3 components as LSS or NRS.

The exemption categorization process does not explicitly assign a category to the structural integrity function of components. However, consideration of the probability and impact of structural integrity failure is inherent in the component performance and reliability data (both STP and industry) used during the categorization process. Passive failures of selected pressure boundary components are also included in the PRA as initiating events, based on their impact on the plant and the frequency of occurrence. Additionally, spatial interaction analyses for internal flooding scenarios are also included. The PRA results show that internal floods are not dominant scenarios to either core damage or large early release. Furthermore, other types of spatial interactions are not important for Class 3 components. In addition, most Class 3 systems are not high energy systems. For those systems that are not high energy, pipe whip and jet impingement are not a significant concern, and a postulated rupture of the system would not result in a harsh environment. Furthermore, the probability of a rupture of a Class 3 system at the same time as a safety system being demanded to support accident or transient mitigation is very remote and not credible. Finally, Section 3.6.1.3.2 of the Updated Final Safety Analysis Report for STP identifies various design features that are in place to protect other systems from the effects of pipe failures, including separation of piping from other safety systems, use of barriers and shields, and use of piping restraints. Based upon all of the above, it is apparent that, from a risk-informed perspective, the importance of Class 3 components is limited to the pressure boundary function, not structural integrity. Therefore, there is no technical basis for requiring the exemption categorization process to explicitly account for structural integrity failures of passive components.

Finally, as noted above, with one exception involving a portion of the AFW system, the category assigned to the pressure boundary function under the exemption categorization process is the same as or higher than the category assigned to the associated piping under the NRC-approved RI-ISI risk ranking process for STP. This is a further indication of the robustness of the exemption categorization process, as applied to both pressure boundary and structural integrity functions.

Thus, from a risk-informed perspective, STPNOC concludes that its exemption categorization process adequately evaluates the safety significance of the passive functions, such as pressure boundary and structural integrity, of Class 3 components.

## 13.7 RISK-INFORMED SPECIAL TREATMENT REQUIREMENTS

### 13.7.1 Introduction

NRC regulations in 10 CFR Parts 21, 50, and 100 contain special tr.atment requirements that impose controls to ensure the quality of components that are safety-related, important to safety, or otherwise come within the scope of the regulations. These special treatment requirements go beyond normal commercial and industrial practices, and include quality assurance (QA) requirements, qualification requirements, inspection and testing requirements, and Maintenance Rule requirements. STP has been granted an exemption from the special treatment requirements. Table 13.7-1 identifies the regulations from which an exemption was granted and the scope of the exemption. This exemption only pertains to special treatment requirements; it does not change the ~~design and functional~~ requirements ~~for components.~~ ***of 10 CFR Parts 50 and 100 that specify design or functional requirements for SSCs; i.e., the requirements that specify the safety functions to be performed by a system or component (including features to prevent adverse impacts upon the safety function of one SSC due to the failure of another SSC). Also it does not change any design or functional requirements in the other sections of the STP FSAR or requirements of the STP Technical Specifications.***

STP has a risk-informed process for categorizing the safety/risk significance of components. This process is described in Section 13.7.2. Components with no or low safety significance have been exempted from the scope of most of the NRC regulations that impose special treatment requirements, and instead are subject to normal industrial and commercial practices. Additionally, components with medium or high safety significance are evaluated for enhanced treatment. Components retain their original regulatory requirements unless they have been recategorized using the process described below. The treatment for the various categories of components is described in Section 13.7.3. As part of this process, STP also performs continuing evaluations and assessments, which are described in Section 13.7.4. Finally, STP applies quality assurance to this process, and controls changes to the process, as described in Section 13.7.5.

### 13.7.2 Component Categorization Process

13.7.2.1 <u>Overview of Categorization Process</u>. The process utilized by STP in categorizing components consists of the following major tasks:

1. Identification of functions performed by the subject plant system.
2. Determination of the risk significance of each system function.
3. Identification of the system function(s) supported by that component.
4. Determination of a risk categorization of the component based on probabilistic risk assessment (PRA) insights (where the component is modeled)
5. Development of a risk categorization of the component based on deterministic insights.
6. Designation of the overall categorization of the component, based upon the higher of the PRA categorization and the deterministic categorization.
7. Identification of critical attributes for components determined to be safety/risk significant.

The processes for determining the risk categorization and deterministic categorization of a component are described in more detail in Sections 13.7.2.3 and 13.7.2.4.

Based upon these processes, a component is placed into one of four categories: 1) high safety/risk significant (HSS), 2) medium safety/risk significant (MSS), 3) low safety/risk significant (LSS), and 4) non-risk significant (NRS). This categorization process does not, in and of itself, affect the other classifications of the component (e.g., safety, seismic, ASME classification).

The process is implemented by a Working Group comprised of individuals experienced in various facets of nuclear plant operation and reviewed by an Expert Panel. This integrated decision process is described in more detail in Section 13.7.2.2.

13.7.2.2 Comprehensive Risk Management Process. The integrated decision-making process used by STP is controlled by procedure. The integrated decision-making process incorporates the use of an Expert Panel and Working Groups. The Expert Panel is comprised of qualified senior level individuals and is responsible for oversight of the program and for reviewing the activities and recommendations of the Working Group. The Working Group is comprised of experienced individuals who apply risk insights and experience to categorize components in accordance with the process described in this Section and make recommendations to the Expert Panel.

The Expert Panel and Working Group have expertise in the areas of risk assessment, quality assurance, licensing, engineering, and operations and maintenance. The combined membership of the Expert Panel and Working Group includes at least three individuals with a minimum of five years experience at STP or similar nuclear plants, and at least one individual who has worked on the modeling and updating of the PRA for STP or similar plants for a minimum of three years.

Procedures control the composition of and processes used by the Expert Panel and Working Group. Procedures also identify training requirements for members of the Expert Panel and Working Group, including training on probabilistic risk assessment, risk ranking, and the graded quality assurance process. Finally, the procedures specify the requirements for a quorum of the Expert Panel and Working Group, meeting frequencies, the decision-making process for determining the categorization of components, the process for resolving differing opinions among the Expert Panel and Working Group, and periodic reviews of the appropriateness of the programmatic control and oversight of categorized components.

13.7.2.3 PRA Risk Categorization Process. A component's risk categorization is initially based upon its impact on the results of the PRA. **[COMMENT: No discussion of sensitivity studies included in this section of the categorization process.]**

STP's PRA calculates both a core damage frequency (CDF) and a large early release frequency (LERF). The PRA models internal initiating events at full power, and also accounts for the risk associated with external events.

The PRA configuration control program incorporates a feedback process to update the PRA Model. The updates are segregated into two categories:

- The plant operating update incorporates plant design changes and procedure changes that affect PRA-modeled components, initiating event frequency updates, and changes in SSC unavailability that affect the PRA model. These changes will be incorporated into the model on a period not to exceed 36 months.

- The comprehensive data update incorporates changes to plant-specific failure rate distributions and human reliability, and any other database distribution updates (examples would include equipment failure rates, recovery actions, and operator actions). This second category will be updated on a period not to exceed 60 months.

The PRA model may be updated on a more frequent basis if an update would result in a significant increase in the CDF.

Only components that are modeled in the PRA are given an initial risk categorization. The PRA risk categorization of a component is based upon its Fussell-Vessely (FV) importance, which is the fraction of the CDF and LERF to which failure of the component contributes, and its risk achievement worth (RAW), which is the factor by which the CDF and LERF would increase if it were assumed that the component is guaranteed to fail. Specifically, PRA risk categorization is based upon the following:

| PRA Ranking | Criteria |
|---|---|
| High | RAW ≥ 100.0 or<br>FV > 0.01 or<br>FV > 0.005 and RAW ≥ 2.0 |
| Medium (Further Evaluation is Required) | FV < 0.005 and 100.0 > RAW ≥ 10.0 |
| Medium | FV ≥ 0.005 and RAW < 2.0 or<br>FV < 0.005 and 10.0 > RAW ≥ 2.0 |
| Low | FV < 0.005 and RAW < 2.0 |

13.7.2.4 Deterministic Categorization Process. Components are subject to a deterministic categorization process, regardless of whether they are also subject to the risk categorization process using PRA insights. This deterministic categorization process can result in an increase, but not a decrease (from the PRA risk), in a component's categorization. **[COMMENT: Needs to discuss the application of the RI-ISI methodology for passive pressure boundary function categorization of ASME Class 1, 2, & 3 components.]**

A component's deterministic categorization is directly attributable to the importance of the system function supported by the component. In cases, where a component supports more than one system function, the component is classified based on the highest safety classification of the function supported. In categorizing the functions of a system, the Working Group considers five critical questions regarding the function, each of which is given a different weight. These questions and their weight are as follows:

| QUESTION | WEIGHT |
|---|---|
| Is the function used to mitigate accidents or transients? | 5 |
| Is the function specifically called out in the emergency operating procedures (EOPs) or Emergency Response Procedures (ERPs)? | 5 |
| Does the loss of the function directly fail another risk-significant system? | 4 |
| Is the loss of the function safety significant for shutdown or mode changes? | 3 |
| Does the loss of the function, in and of itself, directly cause an initiating event? | 3 |

Based on the impact on safety if the function is unavailable and the frequency of loss of the function, each of the five questions is given a numerical answer ranging from 0 to 5. This grading scale is as follows:

"0" - Negative response

"1" - Positive response having an insignificant impact and/or occurring very rarely

"2" - Positive response having a minor impact and/or occurring infrequently

"3" - Positive response having a low impact and/or occurring occasionally

"4" - Positive response having a medium impact and/or occurring regularly

"5" - Positive response having a high impact and/or occurring frequently

The definitions for the terms used in this grading scale are as follows:

Frequency Definitions –

- Occurring Frequently – continuously or always demanded
- Occurring Regularly – demanded > 5 times per year
- Occurring Occasionally – demanded 1-2 times per cycle
- Occurring Infrequently – demanded < once per cycle
- Occurring Very Rarely – demanded once per lifetime

Impact Definitions –

- High Impact – a system function is lost which likely could result in core damage and/or may have a negative impact on the health and safety of the public

- Medium Impact – a system function is lost which may, but is not likely to, result in core damage and/or is unlikely to have a negative impact on the health and safety of the public

- Low Impact – a system function is significantly degraded, but no core damage and/or negative impact on the health and safety of the public is expected
- Minor Impact – a system function has been moderately degraded, but no core damage or negative impact on the health and safety of the public
- Insignificant Impact – a system function has been challenged, ' ut no core damage or negative impact on the health and safety of the public

Although some of these definitions are quantitative, both of these sets of definitions are applied based on the collective judgment and experience of the Working Group.

The numerical values, after weighting, are summed; the maximum possible value is 100. Based on the sum, functions are categorized as follows:

| SCORE RANGE | CATEGORY |
|---|---|
| 0 – 20 | NRS |
| 21 – 40 | LSS |
| 41 – 70 | MSS |
| 71 – 100 | HSS |

A function with a low categorization due to a low sum can receive a higher risk classification if any one of their five questions received a high numerical answer. Specifically, a weighted score of 25 on any one question results in an HSS categorization; a weighted score of 15-20 on any one question results in a minimum categorization of MSS; and a weighted score of 9-12 on any one question results in a minimum categorization of LSS. This is done to ensure that a component with a significant risk in one area does not have that risk masked because of its low risk in other areas.

In general, a component is given the same categorization as the system function that the component supports. However, a component may be ranked lower than the associated system function.

General notes are used to document component risk justification, where needed, for similar component types that are treated the same from system to system. Components covered by a general note are evaluated by the Working Group to ensure proper applicability of the note and appropriateness of the risk categorization. The use of general notes is an administrative tool that allows for increased efficiency in the documentation of justifications of large numbers of similar components. General notes are not used for system functions.

13.7.2.5 Defense in Depth and Safety Margins. For the following reasons, the exemption and the categorization process maintain defense in depth and sufficient safety margins:

**[COMMENT: Discussion on Containment Integrity as defense in depth may be needed here]**

- Functional requirements and the design ~~configuration~~ *bases* of systems *will not be changed by this exemption.* ~~are retained.~~
- No existing plant barriers are removed or altered.
- Design provisions for redundancy, diversity, and independence are maintained.
- The plant's response to transients or other initiators is not affected.
- Preventive or mitigative capability of components is preserved.
- There is no change in any of the safety analyses in the UFSAR.
- Existing safety-related LSS and NRS components will not be replaced, absent good cause (e.g., obsolescence or failure). Since the existing safety-related LSS and NRS components were designed, procured, manufactured, and installed in accordance with the existing special treatment requirements, these components have inherent design margins to perform their intended functions that will not be adversely affected by this exemption.
- ~~Normal commercial and industrial practices~~ ***The treatment processes described in Section 13.7.3*** provide an appropriate and acceptable level of assurance that safety-related LSS and NRS components will be able to perform their intended functions.
- The corrective action program is applied to safety-related LSS and NRS components. This program provides reasonable assurance that deficiencies involving safety-related LSS and NRS components will be identified, corrected, and necessary action taken to ensure acceptable performance levels are maintained.

13.7.3 Treatment for Component Categories

13.7.3.1 Description of Treatment for Component Categories. The following treatment is provided for the various component categories:

- Safety-Related HSS and MSS Components – ***The purpose of treatment applied to safety-related HSS and MSS SSCs is to maintain compliance with NRC regulations and the ability of these SSCs to perform any risk-significant functions consistent with the assumptions in the categorization process.*** These components continue to receive the treatment required by NRC regulations and STP's associated implementing programs.

  Some safety-related components may be called upon to perform functions that are beyond the design basis or perform safety-related functions under conditions that are beyond the design basis. STP's PRA does not take credit for such functions unless there is basis for confidence that the component will be able to perform the functions (e.g., the functions are subject to special treatment; demonstrated ability of the component to perform the functions under the specified conditions). Additionally, to the extent that the PRA does credit such functions, the PRA assumes a reduced reliability for the function commensurate with the severity of the beyond design basis conditions in question and the special treatment provided to the function. However, if STP should decide to take credit for such functions beyond that described above, STP would use the process described in Section 13.7.3.2 to evaluate the risk-significant functions performed by these components that are not being treated under STP's current programs, and provide enhanced treatment for such functions.

- Non-Safety-Related HSS and MSS Components – ***The purpose of treatment applied to non-safety-related HSS and MSS SSCs is to maintain their ability to perform risk-significant functions consistent with the assumptions in the categorization process.*** These components will continue to receive any existing special treatment required by NRC regulations and STP's implementing programs. Additionally, the risk-significant functions of these components will receive consideration for enhanced treatment. This consideration is described in Section 13.7.3.2.

- <u>Safety-Related LSS and NRS Components</u> – These components receive STP's normal commercial and industrial practices. These practices are described in Section 13.7.3.3.

- <u>Non-Safety-Related LSS and NRS Components</u> – The treatment of these components is not subject to regulatory control.

- <u>Uncategorized Components</u> – Until a component is categorized, it continues to receive the treatment required by NRC regulations and STP's associated implementing programs, as applicable.

13.7.3.2 <u>Enhanced Treatment for HSS and MSS Components</u>. Non-safety-related HSS and MSS components may perform risk-significant functions that are not addressed by STP's current treatment programs.

When a non-safety-related component is categorized as HSS or MSS, STP documents the condition under the corrective action program and determines whether enhanced treatment is warranted to enhance the reliability and availability of the function. In particular, STP evaluates the treatment applied to the component to ensure that the existing controls are sufficient to maintain the reliability and availability of the component in a manner that is consistent with its categorization. This process evaluates the reliability of the component, the adequacy of the existing controls, and the need for any changes. If changes are needed, additional controls are applied to the component. In addition, the component is placed under the Maintenance Rule monitoring program, if not already scoped in the program (i.e., failures of the component are evaluated and Maintenance Rule Functional Failures (MRFF) involving the component are counted against the performance criteria at the plant/system/train level, as applicable). Additionally, as provided in the approved GQA program, non-safety-related HSS and MSS components are subject to the TARGETED QA program. These controls will be specifically 'targeted' to the critical attributes that resulted in the component being categorized as HSS or MSS. Components under these controls will remain non-safety-related, but the special treatments will be appropriately applied to give additional assurance that the component will be able to perform its HSS/MSS function when demanded.

As discussed in Section 13.7.3.1, STP's PRA does not take credit for the beyond-design basis functions of safety-related components, unless there is a basis for confidence that the component will be able to perform the functions. However, if STP should decide to take credit for a risk-significant function in a situation in which existing special treatment does not provide the applicable level of confidence, STP would use the process described above to evaluate enhanced treatment for the function.

These identified processes provide reasonable assurance that HSS and MSS components will be able to perform their safety significant functions. ***The validation of functionality of HSS and MSS SSCs (safety-related and non-safety-related) will consist of a documented engineering evaluation to determine what enhanced treatment, if any, is warranted for these SSCs to provide confidence that the applicable risk significant functions will be satisfied. The performance of these SSCs will be monitored sufficiently to assure their ongoing capability to perform their applicable functions credited in the PRA. The design control process will assure*** *that facility changes affecting the risk-significant functions of these SSCs credited in the PRA will continue to be capable of performing those functions.*

13.7.3.3 Normal Commercial and Industrial Practices for Safety-Related LSS and NRS Components

A description of STP's commercial practices is provided below. ***The purpose of the treatment practices applied to safety-related LSS and NRS SSCs is to maintain their design basis and functionality under all design-basis conditions.***

13.7.3.3.1 Design Control Process. The Station's Design Control Program is used for safety-related SSCs, including safety-related LSS and NRS SSCs). The Design Control Program complies with 10 CFR Part 50, Appendix B, and is described in the Operations Quality Assurance Plan (OQAP). ***The design control process for safety-related LSS and NRS SSCs will maintain and apply the original design inputs and assumptions to maintain the ability of these SSCs to perform their safety-related functions under design-basis conditions. Changes to the design basis of safety-related LSS and NRS SSCs will be controlled following the design control process satisfying 10 CFR Part 50, Appendix B.***

13.7.3.3.2 Procurement Process. ***The procurement process for replacement safety-related LSS and NRS SSCs will maintain and apply the original design inputs and assumptions to maintain the ability of these SSCs to perform their safety-related functions under design-basis conditions.*** Technical requirements (including applicable design basis environmental and seismic conditions) are ~~***specified***~~ ***satisfied*** for items to be procured, which include the original design inputs and assumptions for the item. ***As described below, one*** or more of the following methods ~~***are***~~ ***will be*** used to determine that the procured item can perform its safety-related function under design basis conditions, including applicable design basis environmental ***(temperature and pressure, humidity, chemical effects, radiation, aging, submergence, and synergistic effects)*** and seismic ***(earthquake motion, as described in the design bases, including seismic inputs and design load combinations)*** conditions:

- Vendor Documentation - ***Vendor documentation should be used when t***he performance characteristics for the item, as specified in vendor documentation (e.g., catalog information, certificate of conformance), satisfy ~~***STP's technical***~~ ***the original SSC's design*** requirements. ***If the vendor documentation does not contain this level of detail, then the design requirements could be provided in the procurement specifications. The vendor's acceptance of the procurement specifications without exception could be used as the basis for confidence that the replacement safety-related LSS or NRS SSC would remain capable of performing its safety-related functions under design basis conditions.***

- Equivalency Evaluation - An equivalency evaluation ***could be used when it is sufficient to*** determine~~***s***~~ that the procured item is equivalent to the item being replaced (e.g., a like-for-like replacement). ***An equivalency evaluation is sufficient to demonstrate component functionality under design basis harsh environmental conditions for identical components.***

- Engineering Evaluation - ***For minor differences, an*** engineering evaluation ***that*** compares the differences between the procured item and original item ***and demonstrates that the differences in material, size, shape, stressors, aging***

***mechanisms, and functional capabilities would not adversely affect the ability to perform the safety related functions of the SSC could be used to establish component functionality under design basis conditions.***

- Engineering Analysis - In cases involving ~~***design changes or***~~ substantial differences between the procured item and ~~***replacement***~~ ***original*** item, an engineering analysis ~~***may***~~ ***could*** be performed to determine that the procured item can perform its safety-related function under design basis conditions. The engineering analysis ~~***may***~~ ***would*** be based upon a computer calculation, evaluations by multiple disciplines, test data, or operating experience related to the procured item over its expected life. ***Where the differences are determined to result in a design change, STP will following the design control process for safety-related SSCs.***

**[COMMENT: Further discussions may be required on the level of detail required for an engineering analysis to address environmental design basis conditions.]**

- Testing - If none of the above methods are sufficient, commercial testing ***under simulated design basis conditions*** would be performed on the component. Margins ***and*** documentation~~***, and additional assurance***~~ specified in NRC regulations would not be required in these tests, since the components are LSS/NRS and do not warrant this additional assurance.

Documentation of the implementation of these methods is maintained. Additionally, documentation is maintained to identify the preventive maintenance needed to preserve the capability of the procured item to perform its safety-related function under applicable design basis environmental and seismic conditions for its expected life.

A Purchase Order is issued to the supplier, which specifies the item to be procured either by catalog identification or procurement specifications~~***, as applicable***~~.

STP uses the following commercial national consensus standards in the procurement process~~***, as necessary***~~ to provide confidence that components can perform their safety-related function:

X Standards required by the State of Texas to be used in the process.

X Standards used at STP for ***the procurement of SSCs consistent with STP's normal commercial and industrial practices.*** ~~***processes or component attributes that are not subject to NRC special treatment requirements.***~~

STP does not need to itemize the standards in use at STP or to perform an evaluation of all national consensus standards.

The procurement program provides for the identification and implementation of special handling and storage requirements ~~**(if required)**~~ to ensure that the item is not damaged or degraded during shipment to the site or during storage on site. These handling and storage requirements consider available recommendations from the vendor. STP may use an alternative to these recommendations if there is a ***technical basis that*** ~~continues to~~ ***supports the functionality of the safety-related LSS and NRS SSCs.*** ~~***basis for doing so.***~~ The basis does not need to be documented.

At the time of receipt, the received item is inspected to ensure that the item was not damaged in the process of shipping, and that the item received is the item ordered.

13.7.3.3.3 Installation Process. ***The installation process for safety-related LSS and NRS SSCs will be implemented to maintain the ability of these SSCs to perform their safety-related functions under design-basis conditions.*** STP uses the following commercial national consensus standards in the installation process~~, as necessary~~ to provide confidence that components can perform their safety-related function:

- X Standards required by the State of Texas to be used in the process.

- X Standards used at STP for ***the installation of SSCs consistent with STP's normal commercial and industrial practices.***~~*processes or component attributes that are not subject to NRC special treatment requirements.*~~

STP does not need to itemize the standards in use at STP or to perform an evaluation of all national consensus standards.

~~Appropriate~~ *Post-installation* testing ~~*is*~~ ***will be*** performed ~~*if the installation could affect an*~~ ***to provide confidence that the installed SSC will perform its safety function satisfactorily in service.*** ~~*SSC's safety-related function*~~. The test verifies that the SSC is operating within expected parameters and is functional. The testing may necessitate that the SSC be placed in service to validate the acceptance of its performance. Testing is not necessarily performed under design basis conditions.

13.7.3.3.4 Maintenance Process. ***The maintenance process for safety-related LSS and NRS SSCs will be implemented to maintain the ability of these SSCs to perform their safety-related functions under design-basis conditions through predictive, preventive, and corrective maintenance.*** Preventive maintenance tasks are developed for active structures, systems, or components factoring in vendor recommendations. STP may use an alternative to these recommendations if there is a ***technical basis that supports the functionality of the safety-related LSS and NRS SSCs.*** ~~*basis for doing so.*~~ The basis does not need to be documented. ***For SSCs with a designed life, STP will perform an analysis before the SSC exceeds this life to determine whether the SSC will remain capable of performing its safety-related function(s) beyond its designed life. The service conditions for SSCs with a designed life will be monitored to ensure the basis for the designed life remains valid.***

The frequency and scope of predictive maintenance actions are established and documented based on ~~various considerations such as~~ vendor recommendations, environmental operating conditions, safety significance, and operating performance history. STP may deviate from vendor recommendations ***where a technical basis supports the functionality of the safety-related LSS and NRS SSCs.*** ~~based on specific circumstances and sound business practices.~~ Such deviations are not required to be documented.

When an SSC deficiency is identified, it is documented and tracked through the Corrective Action Program. The deficiency is evaluated to determine the ~~*appropriate*~~ corrective maintenance to be performed.

Following maintenance activities that affect the capability of a component to perform its safety-related function, ~~***appropriate***~~ post maintenance testing is performed to provide confidence that the SSC is performing within expected parameters.

STP uses the following commercial national consensus standards in the maintenance process~~,~~ ~~***as necessary***~~ to provide confidence that components can perform their safety-related function:

X Standards required by the State of Texas to be used in the process.

X Standards used at STP for ***maintenance of SSCs consistent with STP's normal commercial and industrial practices.***~~***processes or component attributes that are not subject to NRC special treatment requirements.***~~

STP does not need to itemize the standards in use at STP or to perform an evaluation of all national consensus standards.

13.7.3.3.5 Inspection, Test, and Surveillance Process. ***The inspection, test, and surveillance process for safety-related LSS and NRS SSCs will be implemented to maintain the ability of these SSCs to perform their safety-related functions under design-basis conditions.*** The Station's inspection and test process is primarily addressed and implemented through the Maintenance process. As stated above, the Maintenance process addresses inspections and tests through corrective, preventive, and predictive maintenance activities. These activities factor in vendor recommendations into the selected approach. STP may use an alternative to these recommendations if there is a ***technical basis that supports the functionality of the safety-related LSS and NRS SSCs.*** ~~***basis for doing so.***~~ The basis does not need to be documented.

For ASME pumps and valves, the inspection, test, and surveillance process provides data/information that allows ~~***insights***~~ ***evaluation*** of operating characteristics sufficient to

conclude that the component will ***perform its safety function under design-basis conditions until the next time operational data/information is obtained*** ~~***likely satisfy its functional requirements.***~~

STP uses the following commercial national consensus standards in the inspection, test, and surveillance process~~,~~ ~~***as necessary***~~ to provide confidence that components can perform their safety-related functions:

X Standards required by the State of Texas to be used in the process.

X Standards used at STP for ***testing, inspecting, or surveillance of SSCs consistent with STP's normal commercial and industrial practices.*** ~~***processes or component attributes that are not subject to NRC special treatment requirements.***~~

STP does not need to itemize the standards in use at STP or to perform an evaluation of all national consensus standards.

13.7.3.3.6 Corrective Action Program. The Station's Corrective Action Program is used for both safety-related (LSS and NRS as well as HSS and MSS SSCs) and non-safety-related applications. The Corrective Action Program complies with 10 CFR Part 50 Appendix B, and is described in the OQAP.

13.7.3.3.7 Management and Oversight Process. ***The management and oversight process for safety-related LSS and NRS SSCs will be implemented to maintain the ability of these SSCs to perform their safety-related functions under design-basis conditions.*** The Station's management and oversight process is accomplished through approved procedures and guidelines. This process includes independent oversight, line self-assessments, and Maintenance Rule implementation (***plant,*** system, or train level for LSS and NRS ***components***). In addition, the Graded Quality Assurance Working Group periodically assesses SSC performance.

Procedures provide for the qualification, training, and certification of personnel~~, commensurate with the functions they perform~~. ~~Experienced personnel may be exempted from prerequisite training.~~ STP considers vendor recommendations in the training, qualification, and certification of personnel. STP may use an alternative to these recommendations if there is a ***technical basis that supports the functionality of the safety-related LSS and NRS SSCs.*** ~~basis for doing so.~~ The basis does not need to be documented. Additionally, STP uses the following commercial national consensus standards for qualification, training, and certification of personnel~~, as necessary~~ to provide confidence that components can perform their safety-related function:

X Standards required by the State of Texas to be used in the process.

X Standards used at STP for ***qualification, training, or certification of personnel, consistent with STP's normal commercial and industrial practices.*** ~~processes or component attributes that are not subject to NRC special treatment requirements.~~

STP does not need to itemize the standards in use at STP or to perform an evaluation of all national consensus standards.

Documentation, reviews, and record retention requirements for completed work activities are governed by Station procedures.

Procedures identify the types of inspection, test, and surveillance equipment requiring control and calibration, and the interval of calibration. Equipment that is found to be in error or defective is removed from service or properly tagged to indicate the error or defect, and a determination is made of the functionality of the ~~HSS/MSS~~ *safety-related* SSCs that were checked using that equipment.

***Planned changes to, or elimination of, commitments described in the FSAR or other licensing bases documentation that address issues identified in NRC generic communications (i.e., generic letters or bulletins), NRC orders, notices of violation, etc. related to safety-related LSS and NRS SSCs will be evaluated for the effect on the ability of these SSCs to perform their safety-related functions under design basis conditions in accordance with the current NRC endorsed version of NEI 99-04.***

13.7.3.3.8 Configuration Control Process. The Station's configuration control process is controlled through approved procedures and policies. The design control process ensures that the configuration of the Station is properly reflected in design documents and drawings.

13.7.4 Continuing Evaluations and Assessments
**[Please clarify that Section 13.7.4 only applies to SSCs that have been categorized and includes all categorized SSCs regardless of categorization]**

13.7.4.1 Performance Monitoring. STP has performance monitoring processes for the changes in the special treatment. This monitoring includes the following:

- Maintenance Rule Program – Specific performance criteria are identified at the plant, system, or train level. Regardless of their risk categorization, components that affect MSS or HSS functions will be monitored and assessed in accordance with plant, system and/or train performance criteria.

- Performance Reporting & Identification Database – This database collects both positive and negative indicators from the performance of plant activities, such as corrective maintenance, installation of modifications, and conduct of testing. The Quality organization provides oversight of this database.

- Corrective Action Program - Condition reports document degraded equipment performance or conditions, including conditions identified as a result of operator rounds, system engineer walk-downs, and corrective maintenance activities.

13.7.4.2 Feedback and Corrective Action. STP has feedback and corrective action processes to ensure that equipment performance changes are evaluated for impact on the component risk categorization, the application of special treatment, and other corrective actions. At least once per cycle, performance data is compiled and presented to the Working Group for review, which is performed for each risk-categorized system. Performance and reliability data are generally obtained from sources such as the Maintenance Rule Program and Operating Experience Review.

This process provides an appropriate level of assurance that any significant negative performance changes that are attributed to the relaxation of special treatment controls are addressed in a timely manner. Responsive actions may include the reinstatement of applicable controls up to and including the re-categorization of the component's risk significance, as appropriate.

13.7.4.3 Process for Assessing Aggregate Changes in Plant Risk. The Expert Panel is responsible for assessing and approving the aggregate effect on plant risk for risk-informed applications.

The process used to access the aggregate change in plant risk associated with changes in special treatment for components is based on periodic updates to the station's PRA and the associated PRA risk ranking sensitivity studies. **[COMMENT: Only place that the sensitivity studies are mentioned.]**

13.7.5 Quality Assurance and Change Control for the Risk-Informed Process

13.7.5.1 Quality Assurance for the PRA and Categorization Process.

STP has a PRA configuration control program, which is structured to ensure that changes in plant design and equipment performance are reflected in the PRA as appropriate. The PRA configuration control process is controlled by procedures and guidelines that ensure proper control of changes to the models.

13.7.5.2 Regulatory Process for Controlling Changes. Changes affecting Section 13.7 will be controlled in accordance with the following provisions:

a. *Changes in the Component Categorization Process as described in Section 13.7.2 may be made without prior NRC approval, unless the change would decrease the effectiveness of the process in identifying HSS and MSS components.*

b. *Changes in the Treatment of Component Categories as described in Section 13.7.3 may be made without prior NRC approval, unless the change would result in a reduction in the assurance of component functionality.*

c. *Changes in the Continuing Evaluations and Assessments as described in Section 13.7.4 may be made without prior NRC approval, unless the change would result in a decrease in effectiveness of the evaluations and assessments.*

d. *A report shall be submitted, as specified in 10 CFR 50.4, of each change made without prior NRC approval pursuant to these provisions. The report shall identify each change and describe the basis for the conclusion that the change does not involve a decrease in effectiveness or assurance as described above. The report shall be submitted within 60 days of the date of the change.*

e. *Changes to the descriptions of the categorization, treatment, and oversight (evaluation and assessment) processes in Sections 13.7.2, 13.7.3, and 13.7.4 that result in a decrease or reduction in the effectiveness or assurance of these processes as described above shall be submitted to the NRC for prior review and approval.*

- ~~*Changes in the Component Categorization Process as described in Section 13.7.2 may be made without prior NRC approval, unless the change would decrease the effectiveness of the process in identifying HSS and MSS components.*~~

- ~~*Changes in the Treatment of Component Categories as described in Section 13.7.3 may be made without prior NRC approval, unless the change would result in more than a minimal reduction in the assurance of component functionality.*~~

- ~~*Changes in the Continuing Evaluations and Assessments as described in Section 13.7.4 may be made without prior NRC approval, unless the change would result in more than a minimal decrease in effectiveness of the evaluations and assessments.*~~

~~*STP shall submit a report, as specified in 10 CFR 50.4, of each change made without prior NRC approval pursuant to these provisions. The report shall identify each change and summarize the basis for the conclusion that the change does not involve either a decrease/reduction in effectiveness as described above. The report shall be submitted within 60 days of approval of the change.*~~