

## ATTACHMENT 71111.02

INSPECTABLE AREA: Evaluations of Changes, Tests, or Experiments

CORNERSTONES: Initiating Events (10%)  
Mitigating Systems (80%)  
Barrier Integrity (10%)

INSPECTION BASES: This inspection monitors the effectiveness of the licensee's implementation of changes to facility structures, systems, and components (SSCs), risk significant normal and emergency operating procedures, test programs, and the updated final safety analysis report (UFSAR) in accordance with the requirements of 10 CFR 50.59. This inspection provides assurance that required license amendments have been obtained. It verifies aspects of Initiating Events, Mitigating Systems and Barrier Integrity cornerstones for which there are no indicators to measure performance.

LEVEL OF EFFORT: Biennially review approximately 5 to 7 licensee evaluations required by 10 CFR 50.59 for a 1- unit site, 6 to 8 for a 2-unit site, and 7 to 9 for a 3-unit site, respectively, and also approximately 10 to 15 changes, tests, or experiments that were screened out by the licensee for a 1-unit site, 12 to 17 for a 2-unit site, and 14 to 19 for a 3-unit site, respectively.

### 71111.02-01 INSPECTION OBJECTIVES

01.01 To verify that changes to tests or experiments not described in UFSAR (for example a SSC utilized in a way either outside the design basis or inconsistent with the safety analyses), and changes to the facility or procedures as described in the UFSAR, are reviewed and documented in accordance with 10 CFR 50.59. Verify that safety issues pertinent to the changes are resolved.

01.02 To verify that the licensee has obtained NRC approval prior to implementing those changes that require such approval as stated in 10 CFR 50.59.

### 71111.02-02 INSPECTION REQUIREMENTS

## 02.01 Sample Selection

- a. Review the list of evaluations performed by the licensee and select the number of completed evaluations as stated in the Level of Effort above, choosing samples from different cornerstones, and based on risk significance from any of the following:
  1. Tests or experiments not described in UFSAR.
  2. Changes to facility as described in UFSAR.
  3. Changes to procedures as described in UFSAR.

Include in the selection, evaluations associated with calculations, procedure revisions, modifications, non-routine operating configurations, and departures in methods of analyses.

- b. Select samples, as stated in the Level of Effort above, of changes, tests, or experiments that the licensee determined did not require 10 CFR 50.59 evaluations. Choose samples from different cornerstones based on risk significance.

## 02.02 Inspection

- a. Verify that the licensee has considered the conditions under which the licensee may make changes to the facility or procedures or conduct tests or experiments without prior NRC approval. Verify that the licensee has appropriately concluded that the change, test or experiment can be accomplished without obtaining a license amendment.
- b. Verify that safety issues related to the changes, tests, or experiments have been resolved.
- c. For the changes, tests, or experiments that the licensee determined that evaluations were not required, verify that the licensee's conclusions were correct and consistent with 10 CFR 50.59.

02.03 Identification and Resolution of Problems. Verify that the licensee is identifying problems related to 10 CFR 50.59 evaluations and entering them in the corrective action program. For a selected sample of problems associated with 10 CFR 50.59 evaluations, verify that the licensee has resolved the technical concerns and regulatory requirements. See Inspection Procedure 71152, "Identification and Resolution of Problems," for additional guidance.

71111.02-03 INSPECTION GUIDANCE

General Guidance

<b>Cornerstone</b>	<b>Inspection Objective</b>	<b>Risk Priority</b>	<b>Example</b>
Initiating Events	Verify whether facility changes or tests require license amendment	Changes or tests or experiments which increase the likelihood of initiating events	Performing a test that cuts off normal water source to the emergency service water pumps  Modifications to equipment in the switchyard
Mitigating Systems	Verify whether facility changes or tests require license amendment	Changes or tests or experiments which affect the ability to mitigate an accident	Decreasing the flow rate of an residual heat removal pump to less than that analyzed in the safety analysis report
Barrier Integrity	Verify whether facility changes or tests require license amendment	Changes or tests or experiments which affect barrier integrity	Increasing stroke time of a containment isolation valve to greater than that analyzed in the safety analysis report

This inspection procedure may be implemented in combination with Inspection Procedure 71111.17, Permanent Plant Modifications, to derive synergistic benefits from the simultaneous reviews of these two areas and to be more efficient.

Specific Guidance

03.01 No specific guidance

03.02 Obtain and review additional information (such as calculations and analyses) if needed to verify the samples selected.

03.03 No specific guidance

71111.02-04 RESOURCES ESTIMATE

The average resource expenditure for this inspection procedure is estimated as follows: 25 to 33 hours for a 1-unit site; 30 to 41 hours for a 2-unit site; and 35 to 46 hours for a 3-unit site.

This inspection should be performed by inspectors (e.g., engineering specialists) knowledgeable in the affected subject areas,

71111.02-05 COMPLETION STATUS

Inspection of the minimum sample size will constitute completion of this procedure in the RPS. That minimum sample size will consist of 15 samples for a 1-unit site (5 licensee safety evaluations and 10 changes, tests, and experiments); 18 samples for a 2-unit site (6 licensee safety evaluations and 12 changes, tests, and experiments); and 21 samples for a 3-unit site (7 licensee safety evaluations and 14 changes, tests, and experiments).

71111.02-06 REFERENCES

NRC Inspection Manual Part 9900, "10 CFR 50.59 Changes to Facility, Procedures, and Tests(Experiments)."

10 CFR 50.59, "Changes, tests, and experiments"

NRC Regulatory Guide 1.187, "Guidance for Implementation of 10 CFR 50.59, Changes, Test, and Experiments," Rev. Nov 2000.

NEI 96-07, Revision 1 (Nov 2000), Guidance for 10 CFR 50.59 Implementation.

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