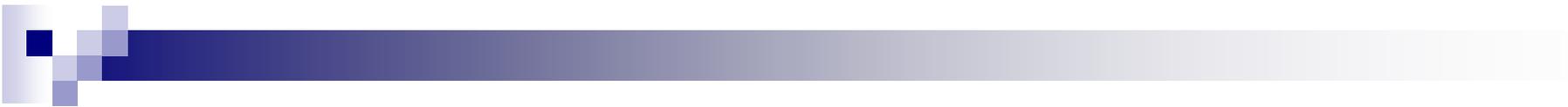




Management Measures

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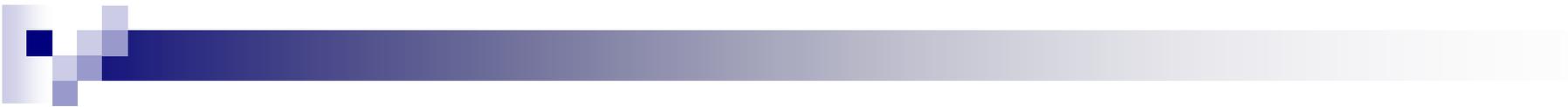


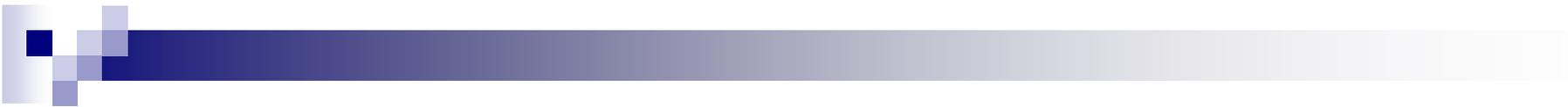
Management Measures Issues:

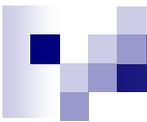
- Application of management measures for IROFS may be viewed as adding significant cost for program compliance
- Perception of burdensome management measures could encourage unnecessary limitation on IROFS or IROFS Boundary

Present Action/Discussion Objective:

- Provide guidance on appropriate application and cost burden of management measures
- Obtain industry views on issues

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- Items Relied On For Safety (IROFS) - structures, systems, equipment, components, and activities of personnel that are relied on to prevent potential accidents at a facility that could exceed the performance requirements in §§ 70.61 or to mitigate their potential consequences.
 - §70.61 Performance requirements - (e) Each engineered or administrative control or control system necessary to comply with paragraphs (b), (c), or (d) of this section shall be designated as an item relied on for safety. The safety program, established and maintained pursuant to §§ 70.62 of this subpart, shall ensure that each item relied on for safety will be available and reliable to perform its intended function when needed and in the context of the performance requirements of this section.

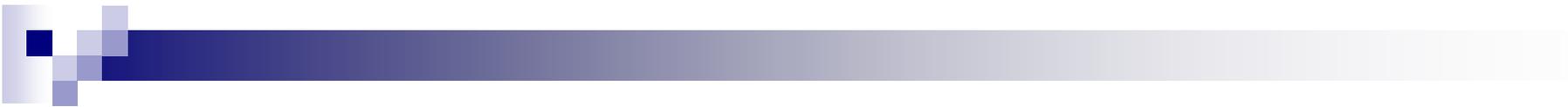
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- Management measures - the functions performed by the licensee, generally on a continuing basis, that are applied to items relied on for safety, to ensure the items are available and reliable to perform their functions when needed.
 - Management measures include:
 - configuration management,
 - maintenance,
 - training and qualifications,
 - procedures,
 - audits and assessments,
 - incident investigations,
 - records management, and
 - other quality assurance elements.



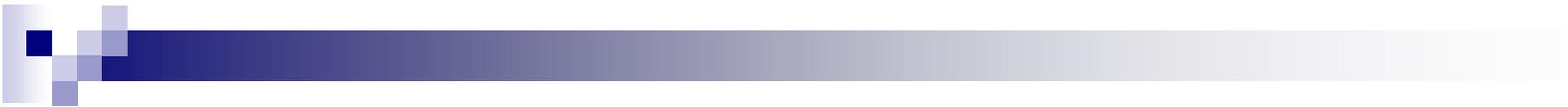
70.62 Safety Program and ISA

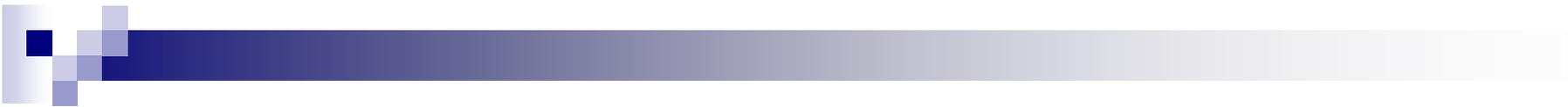
- (a) **Safety program.** (1) Each licensee or applicant shall establish and maintain a safety program that demonstrates compliance with the performance requirements of §§ 70.61. **The safety program may be graded such that management measures applied are graded commensurate with the reduction of the risk attributable to that item.** Three elements of this safety program; namely, process safety information, integrated safety analysis, and management measures.

- (d) *Management measures.* Each applicant or licensee shall establish management measures to ensure compliance with the performance requirements of §§ 70.61. **The measures applied to a particular engineered or administrative control or control system may be graded commensurate with the reduction of the risk attributable to that control or control system.** The management measures shall ensure that engineered and administrative controls and control systems that are identified as items relied on for safety pursuant to §§ 70.61(e) of this subpart are designed, implemented, and maintained, as necessary, to ensure they are available and reliable to perform their function when needed, to comply with the performance requirements of §§ 70.61 of this subpart.

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- In most cases management measures costs should be essentially fixed. Assurance of the functions for which the IROFS are relied upon involves necessary cost. How are management measures a **significant increase** or a **marginal burden** as a function of number of IROFS?

- For:
 - configuration management?
 - maintenance?
 - training and qualifications?
 - procedures?
 - audits and assessments?
 - incident investigations?
 - records management?
 - other quality assurance elements?

- 
- The management measures and/or QA program do not dictate or require specific technical requirements, codes, standards, inspections, or tests.
 - Those are driven or determined by the engineering design and safety analyses, and are the responsibility of the licensee. In many, if not most cases, the identical requirements will be specified for plant efficiency and process control whether or not the item is an IROFS.
 - The licensee specifies the functions relied upon and can apply, **in a graded manner**, the controls needed to assure availability.

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- Management measures' costs (design, procurement, testing, inspection) do not depend on quantity of IROFS. They are based on the complexity of the IROFS' functions that must be assured for safety prevention or mitigation.
 - What is the cost of having an audit program for 87 IROFS versus 88 IROFS?
 - If a significant burden, then - How? What? Why? When? Where?
 - Let's Discuss Specific Generic Examples