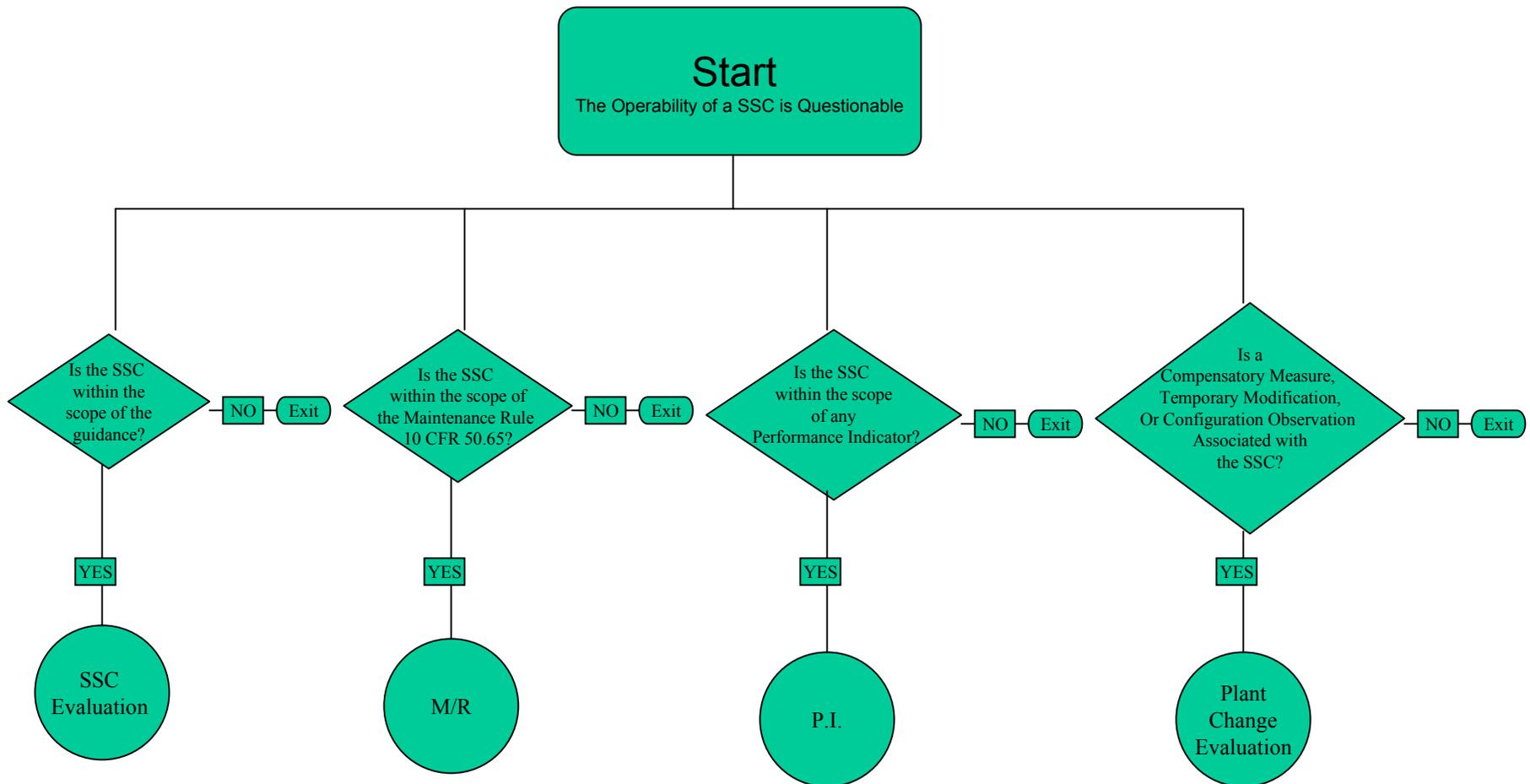
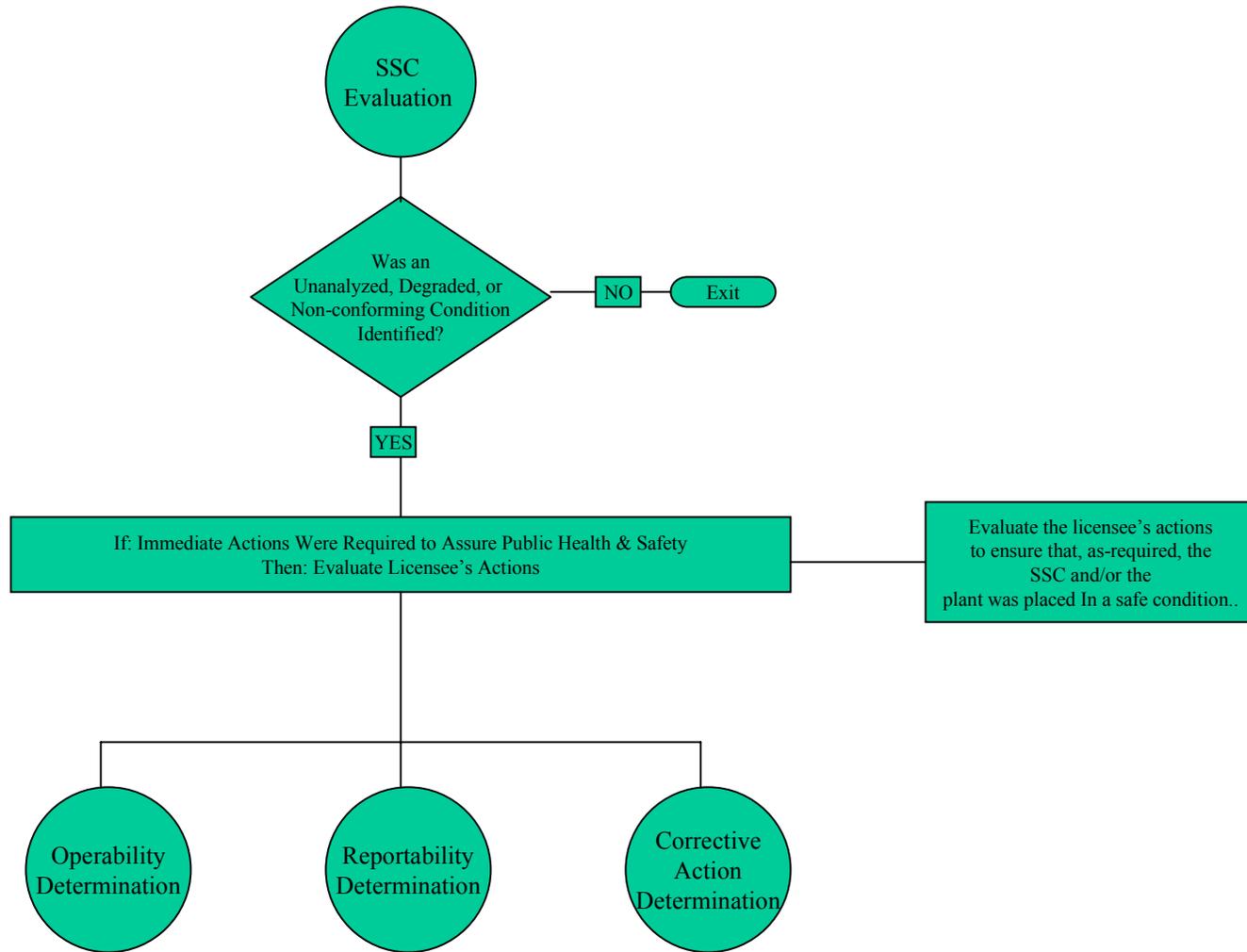
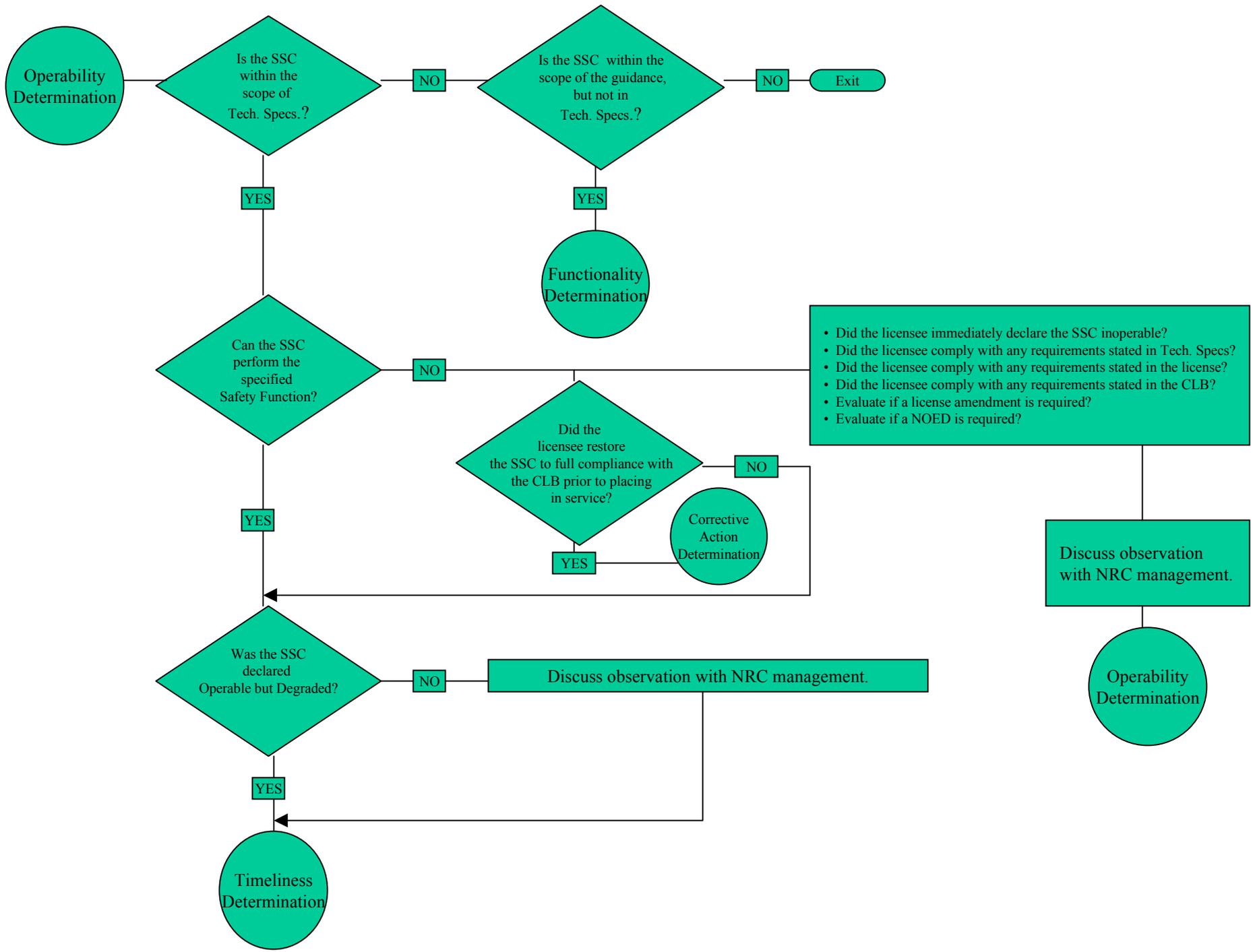


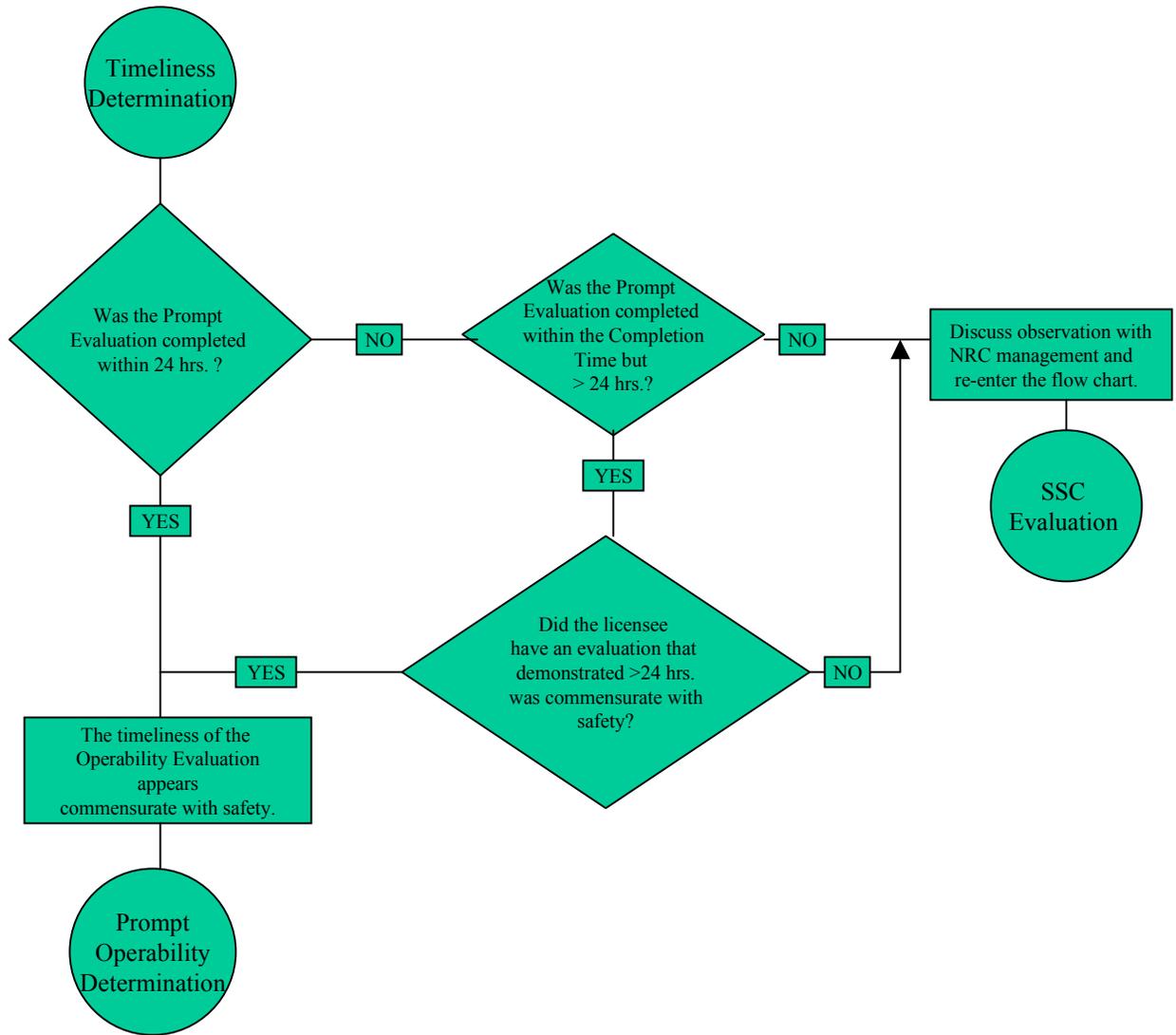
# Assistance Navigator

## “ Operability Determinations & Resolution of Nonconformances of SSC’s ”







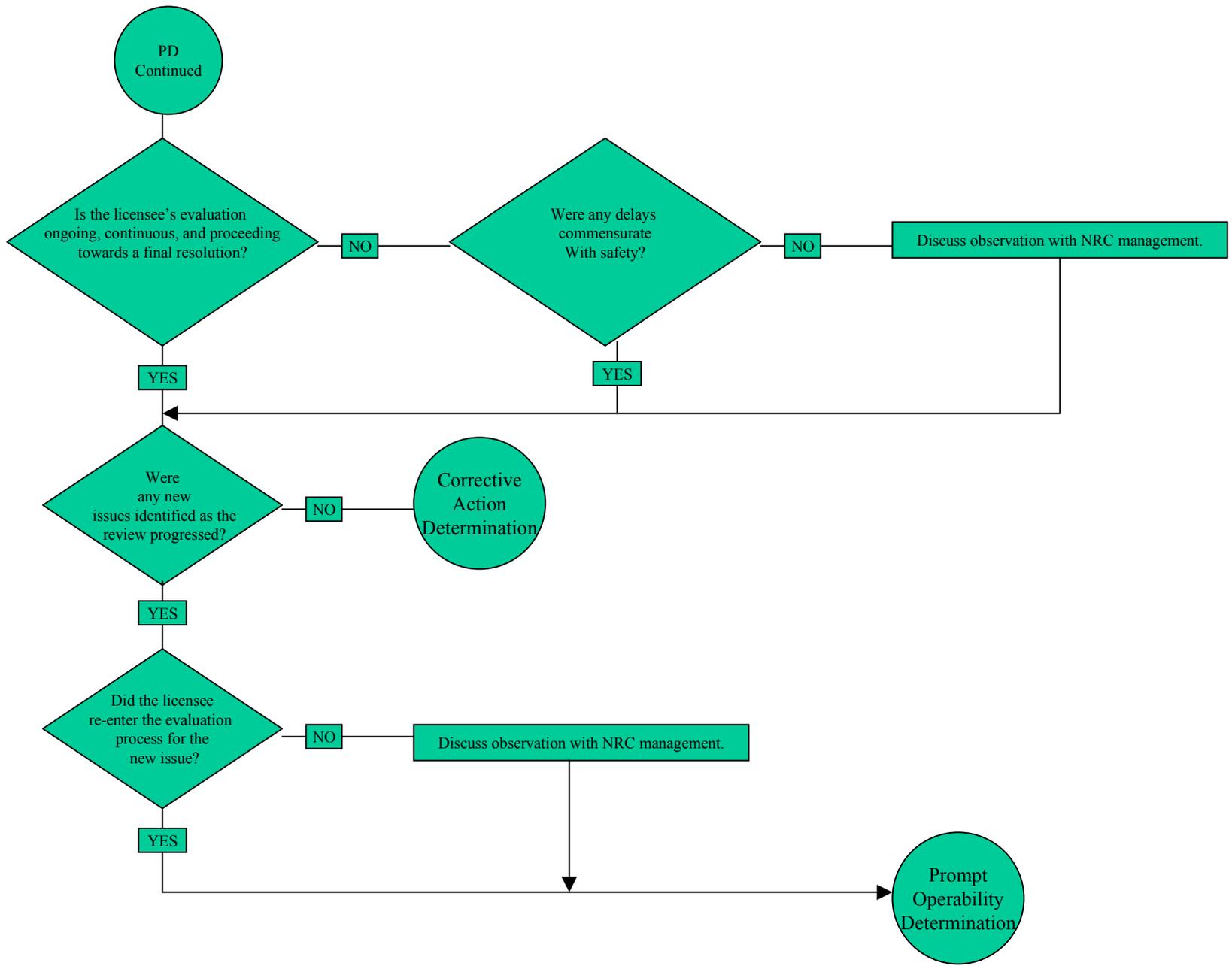


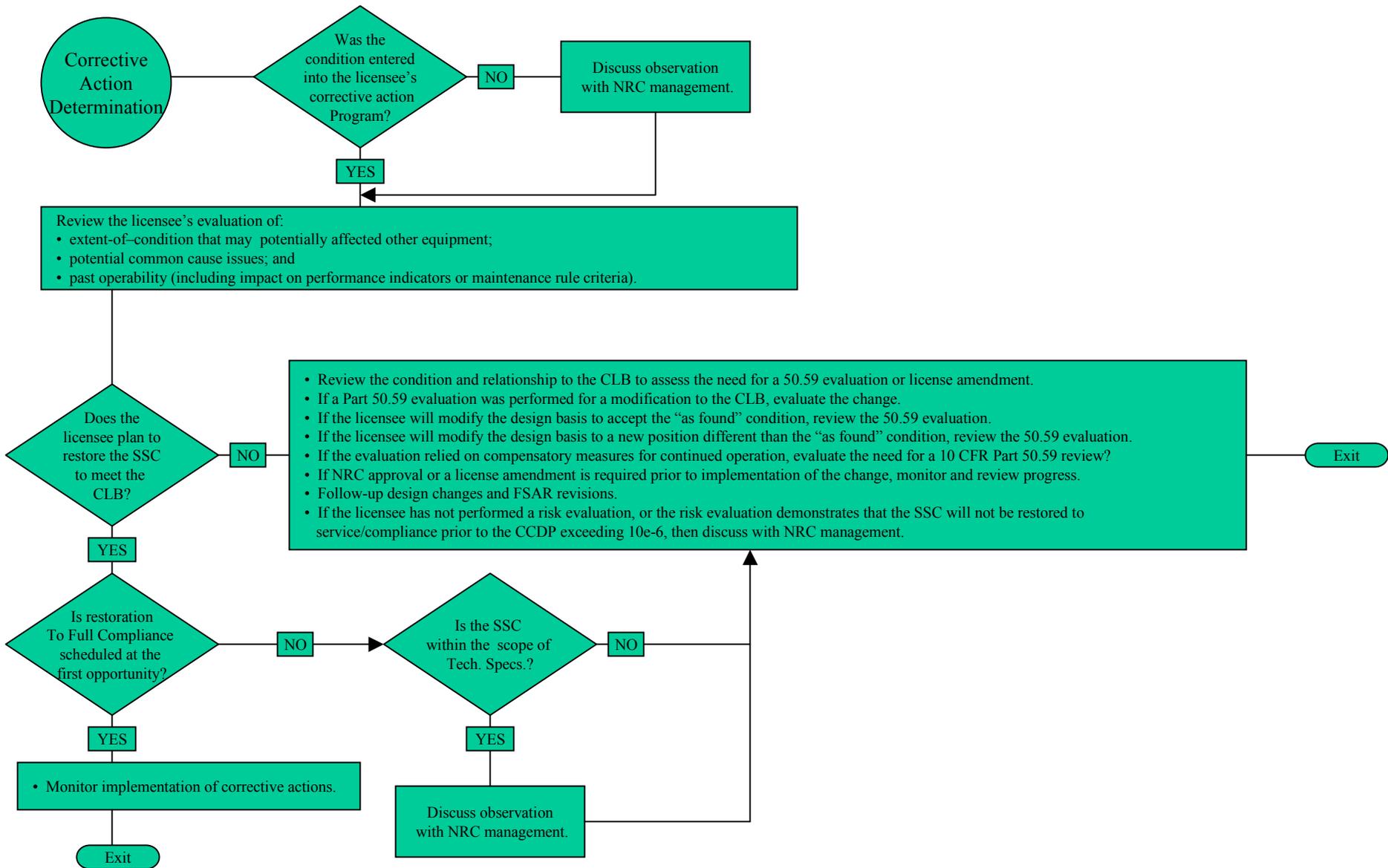
Prompt  
Operability  
Determination

- Did the scope, as a minimum:
  - Determine what equipment is degraded or potentially nonconforming?
  - Determine the safety functions of the equipment?
  - Determine the circumstances of the potential nonconformance, including the possible failure mechanism?
  - Determine the requirement or commitment established for the equipment, and why the requirement or commitment may not be met?
  - Determine by what means and when the potentially non conforming equipment was first discovered?
  - Determine the safest plant configuration including the effect of transitional action?
  - Determine the basis for declaring the affected system operable, through: analysis, test or partial analysis, operating experience, or engineering judgment?
- Does any item in the CLB impact the operability evaluation?
- Does the prompt evaluation appear to validate operability versus verify conformance to the CLB (Justify operation versus verify design basis or other CLB)?
- Does the prompt evaluation consider mission time for related safety functions?
- Does the prompt evaluation rely on testing to support continued operation?
- Does the prompt evaluation rely on compensatory measures for continued operation and if so was the need for a 10 CFR Part 50.59 review evaluated?
- Does the prompt evaluation consider obvious extent-of-condition issues?
- Did the evaluation consider the relationship between commitments, code requirements, and Tech. Spec. operable; and consider the most restrictive requirement?
- Evaluate any use of test, partial test, or analysis using different methods than initial design.

- If engineering judgment was used to support the determination of operable-but-degraded:
- Were sound engineering principals used and documented to support the evaluation?
  - If an expert testimony was used, were the credentials adequate to justify expertise, and was the basis for the conclusion documented?

PD  
Continued





Corrective Action Determination

Was the condition entered into the licensee's corrective action Program?

NO

Discuss observation with NRC management.

YES

Review the licensee's evaluation of:

- extent-of-condition that may potentially affected other equipment;
- potential common cause issues; and
- past operability (including impact on performance indicators or maintenance rule criteria).

Does the licensee plan to restore the SSC to meet the CLB?

NO

Exit

YES

Review the condition and relationship to the CLB to assess the need for a 50.59 evaluation or license amendment.

- If a Part 50.59 evaluation was performed for a modification to the CLB, evaluate the change.
- If the licensee will modify the design basis to accept the "as found" condition, review the 50.59 evaluation.
- If the licensee will modify the design basis to a new position different than the "as found" condition, review the 50.59 evaluation.
- If the evaluation relied on compensatory measures for continued operation, evaluate the need for a 10 CFR Part 50.59 review?
- If NRC approval or a license amendment is required prior to implementation of the change, monitor and review progress.
- Follow-up design changes and FSAR revisions.
- If the licensee has not performed a risk evaluation, or the risk evaluation demonstrates that the SSC will not be restored to service/compliance prior to the CCDP exceeding 10e-6, then discuss with NRC management.

Is restoration To Full Compliance scheduled at the first opportunity?

NO

Is the SSC within the scope of Tech. Specs.?

NO

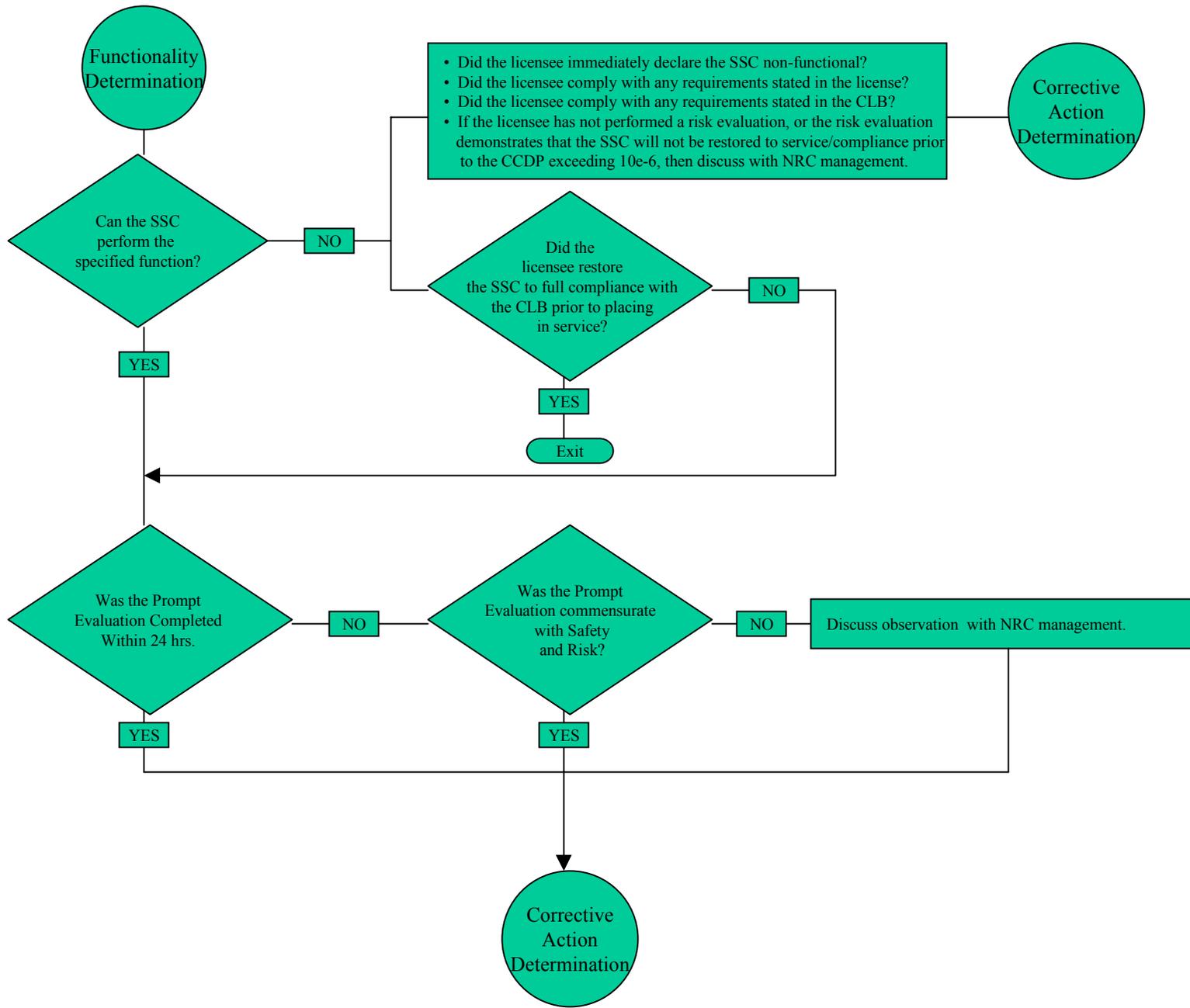
YES

Monitor implementation of corrective actions.

Exit

YES

Discuss observation with NRC management.



Functionality Determination

Can the SSC perform the specified function?

YES

NO

- Did the licensee immediately declare the SSC non-functional?
- Did the licensee comply with any requirements stated in the license?
- Did the licensee comply with any requirements stated in the CLB?
- If the licensee has not performed a risk evaluation, or the risk evaluation demonstrates that the SSC will not be restored to service/compliance prior to the CCDP exceeding 10e-6, then discuss with NRC management.

Corrective Action Determination

Did the licensee restore the SSC to full compliance with the CLB prior to placing in service?

YES

Exit

NO

Was the Prompt Evaluation Completed Within 24 hrs.

YES

NO

Was the Prompt Evaluation commensurate with Safety and Risk?

YES

NO

Discuss observation with NRC management.

Corrective Action Determination

