

Step 7: Identify Qualitative Considerations to be Addressed

Qualitative considerations are developed as an input to the IDP. Such considerations include, but are not limited to:

- Surveillance test and performance history of the components and system associated with the STI adjustment.
- Uncertainty associated with the quantitative process.
- The impact of systems not quantified using the internal event PRA.
- The impact of systems for which LERF results are not available.
- The impact of systems for which external events and shutdown PRA are not available.
- Past industry and plant-specific experience with the functions affected by the proposed changes.
- Impact on defense-in-depth protection.
- Vendor-specified maintenance frequency.
- Test intervals specified in applicable industry codes and standards, e.g., ASME, IEEE, etc.
 - Document that a review of both the committed and current version of applicable industry codes and standards was performed.
 - Any deviations from STIs specified in applicable industry codes and standards currently committed to in the plant licensing basis shall be reviewed and documented consistent with the considerations specified within this step (Step 7).
- Impact of a SSC in an adverse or harsh environment.
- Benefits of detection at an early stage of potential mechanisms and degradations that can lead to common cause failures.
- Document that assumptions in the plant licensing basis would not be invalidated when performing the surveillance at the bounding interval limit for the proposed STI change. For example, if the assumptions in the plant licensing basis would be invalidated at the bounding STI, the STI could be limited accordingly or a more conservative acceptance criteria could be established, as appropriate.
- The degree to which the surveillance provides a conditioning exercise to maintain equipment operability, for example, lubrication of bearings or electrical contact wiping (cleaning) of built up oxidation, and limit the STI accordingly.

Deleted: Review both committed and current codes and standards.

- The existence of alternate testing of SSCs affected by the STI change.

The above list of qualitative considerations is not intended to be a complete list. The System Engineering Team will add other qualitative consideration based on their expertise, knowledge of the specific SSC under consideration, and past experience. The IDP in their review of the STI change follows through these qualitative considerations.

The qualitative considerations are summarized and documented in Step 15 and presented to the IDP (Step 16) along with the quantitative considerations from Step 14 and qualitative or bounding analyses from Steps 10a, 10b, and 10c.