

From: Michael S. Peck *MS*
To: William B. Jones
Date: Wed, Nov 2, 2005 1:34 PM
Subject: FYI: CWY - Regarding MSIVs

Mr. Jones:

Please see the following exert from the new (GL 91-18) "PART 9900: TECHNICAL GUIDANCE OPERABILITY DETERMINATIONS & FUNCTIONALITY ASSESSMENTS FOR RESOLUTION OF DEGRADED OR NONCONFORMING CONDITIONS ADVERSE TO QUALITY OR SAFETY"

Section 2.1 Scope of SSCs for Operability Determinations

The operability determination process is used to assess operability of SSCs described in TSs. The scope of SSCs considered within the operability determination process is as follows:

a. SSCs required to be operable by TSs. These SSCs may perform required support functions for other SSCs required to be operable by TSs (e.g., emergency diesel generators and service water).

b. SSCs that are not explicitly required to be operable by TSs, but that perform required support functions (as specified by the TSs definition of operability) for SSCs that are required to be operable by TSs

2.2 Scope of SSCs for Functionality Assessments

Functionality assessments should be performed for SSCs not described in TSs, but which warrant programmatic controls to ensure that SSC availability and reliability are maintained. In general, these SSCs and the related controls are included in programs related to Appendix B to 10 CFR Part 50, "Quality Standards and Records," and the maintenance rule (10 CFR 50.65). Additionally, SSCs warrant functionality assessments within the processes used to address degraded and nonconforming conditions because they perform specified functions described in the Updated Final Safety Analysis Report (UFSAR), technical requirements manual, emergency plan, fire protection plan, regulatory commitments, or other elements of the current licensing basis (CLB).

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