ATTACHMENT 71111.17

INSPECTABLE AREA: Evaluations of Changes, Tests, or Experiments and Permanent Plant Modifications

CORNERSTONES: Initiating Events
Mitigating Systems
Barrier Integrity

INSPECTION BASES: The 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. The inspection provides assurance that required license amendments have been obtained.

The inspection monitors the implementation of modifications to structures, systems, and components (SSCs). Modifications to one system may also affect the design bases and functioning of interfacing systems as well as introduce the potential for common cause failures.

This inspectable area verifies aspects of the Initiating Events, Mitigating Systems, and Barrier Integrity cornerstones for which there are no indicators to measure performance.

LEVEL OF EFFORT Triennially review 6 to 12 licensee evaluations required by 10 CFR 50.59 and 12 to 25 changes, tests, or experiments that were screened out by the licensee.

Triennially review 5 to 15 permanent plant modifications

71111.17-01 INSPECTION OBJECTIVES

01.01 Verify that evaluations were performed in accordance with 10 CFR 50.59.

01.02 Verify that the design bases, licensing bases, and performance capability of SSCs have not been degraded through modifications.

01.03 Verify that procedures and design and license basis documentation affected by changes have been adequately updated.

01.04 Verify that design and license basis documentation used to support changes, and that procedures and design and license basis documentation affected by changes, reflect the design and license basis of the facility after the change has been made.

71111.17-02 INSPECTION REQUIREMENTS

02.01 Sample Selection

a. For the purpose of this inspection, permanent plant modifications include permanent plant changes, design changes, set point changes, procedure changes, equivalency evaluations, suitability analyses, calculations, and commercial grade dedications.

b. Review modifications, evaluations performed in accordance with 10 CFR 50.59, and changes, test, or experiments that the licensee determined did not require 10 CFR 50.59 evaluations based upon the following:

1. Safety Significance;
2. Risk Significance;
3. Complexity.

Substantial changes and modifications should be reviewed as samples. Samples should be of such complexity that the change affects the license basis and/or 10 CFR 50.2 Design Basis.

NOTE: Since lists of changes provided by the licensee will not necessarily indicate the complexity and scope of a change, a number of changes will need to be reviewed prior to the inspection to meet the "complexity" criteria contained in section 02.01.b. This is best accomplished by first choosing documents from the list provided by the licensee and then requesting the actual documentation for the changes. An initial review of these changes for complexity prior to the inspection will result in a smaller final list of samples.

02.02 Inspection

a. Inspection of evaluations performed in accordance with 10 CFR 50.59, and changes, test, experiments, or methodology changes that the licensee determined did not require 10 CFR 50.59 evaluations.

1. Verify that when changes, tests, or experiments were made, evaluations were performed in accordance with 10 CFR 50.59. Verify that the licensee has appropriately concluded that the change, test or experiment can be accomplished without obtaining a license amendment.

2.. Verify that safety issues related to the changes, tests, or experiments have been resolved.

3. 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.

4. Verify, as appropriate, that design and license basis documentation used to support the changes, and procedures and design and license basis documentation affected by the changes, reflect the design and license basis of the facility after the change has been made.

b. Inspection of modifications.

1. Verify that supporting design basis documentation have been updated accordingly and are still consistent with the new design. Some examples of supporting design basis documentation would be calculations, design specifications, and vendor manuals.

2. Verify that license basis documentation have been updated accordingly and are still consistent with the new design. Some examples of license basis documentation that could be affected are the UFSAR, Technical Specification and Bases, and plant specific SERs.

3. Verify that other design basis features affected by the modification have been adequately accounted for. Some examples of these type of features include structural, fire protection, flooding, and EQ.

4. Verify that procedures and training plans affected by the modification have been updated adequately. Some examples would be abnormal operating procedures, alarm response procedures, and Licensed Operator Training Manuals.

5. Verify that affected test documentation has been updated and/or new test documentation has been initiated as required by applicable test programs. Some examples of these type of tests would be instrument calibration, Inservice Testing, and breaker clean and inspect.

6. Verify that post-modification testing adequately verified system operability and/or functionality.

See IP 71111.18, “Plant Modifications”, Section 02.02 for additional guidance regarding design review, implementation review, testing review, and updating review.

02.03 Identification and Resolution of Problems

Verify that the licensee is identifying permanent plant modification issues and problems related to 10 CFR 50.59 applicability determinations, screenings and evaluations, and entering them in the corrective action program. For a selected sample, evaluate appropriateness of corrective actions. See IP 71152 for additional guidance.

71111.17-03 RESOURCE ESTIMATE

The inspection procedure is estimated to take 172 to 212 hours for the triennial review. The triennial reviews should be performed by engineering specialists knowledgeable in the affected subject areas.

71111.17-04 COMPLETION STATUS

Inspection of the minimum sample size will constitute completion of this procedure in the RPS. That minimum sample size will consist of the review of 6 to 12 licensee evaluations required by 10 CFR 50.59, 12 to 25 changes, tests, or experiments that were screened out by the licensee, and 5 to 15 permanent plant modifications.

71111.17-05 REFERENCES

Inspection Procedure 71111.18, “Plant Modifications”

Inspection Procedure 71152, “Identification and Resolution of Problems”

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.

END

ATTACHMENT 1

Revision History for IP 71111.17

Commitment Tracking Number	Issue Date	Description of Change	Training Needed	Training Completion Date	Comment Resolution Accession Number
NA	01/31/08 CN 08-005	New inspection procedure (IP) which combines the previous IP 71111.02, “Evaluations of Changes, Tests, or Experiments,” and the biennial portion of IP 71111.17, “Permanent Plant Modifications” as a triennial inspection.	No	NA	ML080250279