



DCD Change (Departure) Evaluations

Purpose

- **To describe the process that NUSTART utilities are using to evaluate departures from the plant-specific DCD.**



Background

- **Part 52 Appendices, Section VIII, provide criteria for evaluating departures from Tier 2 information contained in the plant-specific DCD.**
- **Evaluation criteria in VIII.B.5.b mirror those in 50.59, with several added for ex-vessel severe accident considerations.**
- **NEI 96-07, Revision 1, Guidelines for 10 CFR 50.59 Implementation, provides guidance for development of consistent and effective 50.59 implementation processes.**
- **Regulatory Guide 1.187 endorses NEI 96-07 as acceptable for complying with 10 CFR 50.59.**
- **For consistency, NUSTART utilities are using similar process to NEI 96-07, Rev. 1 for evaluation of departures from the plant-specific DCD.**
- **Evaluation process determines if change (departure) requires prior NRC review.**

Process

Three step process

- **Applicability Determination – distinguishes Tier 2 changes from Tier 1, Tier 2*, Technical Specifications and Operational Requirements changes, which all require prior NRC approval (e.g., exemption, license amendment).**
- **Impact Screening – screens change to determine if “adverse effect” exists; if so, evaluation against VIII.B.5.b and B.5.c criteria is required.**
- **Evaluation against the criteria of 10 CFR 52 Appendices, Section VIII.B.5.b or B.5.c – a “Yes” on impact screen requires evaluation against criteria, to determine magnitude of adverse effect (more than/less than minimal increase?, different type accident?, different result of malfunction?, affects ex-vessel severe accident feature?)**

Departure Reporting

- **NuStart will include departure evaluation summaries, including impact screening results, for reporting required in accordance with Part 52 Appendices, Section X.B.**
- **Maintains a one-to-one correlation to changes in the plant-specific DCD.**
- **Process differs slightly from NEI 96-07 guidance, which does not require reporting for changes which screen out.**

Questions?