

8.2.1.3 Non-Safety-Related SSCs That Are Used in Emergency Operating Procedures

Are the non-safety-related SSCs used in plant Emergency Operating Procedures (EOPs)?

This step requires an evaluation be performed to identify non-safety-related SSCs (only installed equipment under plant control) that are used in EOPs. Nonsafety-related SSCs that are required to be in Maintenance Rule scope by this paragraph are those explicitly used in the EOPs that provide a mitigating function.

- “SSCs used in plant EOPs” means SSCs essential to mitigation of the event that necessitated entry into the EOP.
- Severe Accident Management Guidelines (SAMGs) are not considered to be EOPs. Equipment described only in SAMGs would not be in scope of the Maintenance Rule unless otherwise required by paragraph 50.65(b).
- Equipment installed in support of interim safeguards and security compensatory measures would not be in scope of the Maintenance Rule unless otherwise required by paragraph 50.65(b).

When the EOPs direct the user to another procedure, the associated SSCs required to perform the EOP mitigating function are included in the scope of the Maintenance Rule.

SSCs whose use are implied and are essential to perform the EOP steps in the necessary response times, such as emergency lighting or communication SSCs are included in the scope of the Maintenance Rule. If multiple means of achievement of the implied function are available, only one means needs be included in the scope.

Communication between the control room and a field operator could be accomplished utilizing Gaitronics, Sound Powered Phones, Radios, Cell Phones or some other plant communication system. To ensure reliability, at least one of these forms of communication need to included in the scope of the rule.

For clarity and universal understanding regarding these scoping criteria, the following definitions are offered:

Explicitly used means those SSCs specifically called out in the EOP by tag identification or noun name that provide a mitigating function, and includes those SSCs required to support the explicitly used SSCs even though they are not called out in the EOP. For example, all

SSCs associated with an instrument loop supporting a control room instrument that is specifically called out in the EOP are considered explicitly used.

Implied use means those SSCs ***not*** specifically called out in the EOP, but are understood to be essential for successful completion of the associated mitigating EOP step, although they may not directly address or mitigate the event.

Examples:

To be able to operate a piece of equipment in the plant, sufficient lighting is required for the operator to see to operate the component. This lighting would need to be available under any plant condition including a station blackout. Even though the lighting would not be specifically identified in the EOP, the need for the lighting is implied.

To accomplish the required steps of a EOP, communication may be required between the control room and a field operator. The equipment required for this communication would not be explicitly listed in the EOP, however the need for it is implied.

Mitigate or Mitigating means actions or steps taken to lessen the severity or the adverse consequences of the event that necessitated entry into the EOP.

NOTE: It is reasonable to exclude SSCs from maintenance rule scope under these criteria for which a licensee's approved and documented analysis or evaluation (e.g., FSAR, IPE, PSA, Design Calculation) has demonstrated that a failure of the SSC will not cause a significant change in the expectation of success in accomplishing the EOP Mitigating function. Caution should be exercised in the use of this exclusion.