U.S.NRC

UNITED STATES NUCLEAR REGULATORY COMMISSION

Protecting People and the Environment

ISTOG – NRC Update

Winter Meeting 2010 – Clearwater, FL

Tony McMurtray
Chief, Component Performance & Testing Branch
Office of Nuclear Reactor Regulation
December 6, 2010

Topics for Discussion

- Draft NUREG-1946
  - Replacement for NUREG-1482, Rev. 1
  - Inclusion of Updated Guidance on Preconditioning
- Use of Tech. Spec. Surveillance Reqs. Applicability for IST Pump and Valve Tests
  - Missed Excess Flow Check Valve Test at Clinton
- Dynamic Restraints (Snubbers)
- Other Issues
  - 10 CFR 50.55a Rulemaking
  - 10 CFR 50.69 Alt. Treatment Inspection Procedure
  - ASME/NRC 2011 Symposium

Draft NUREG-1946

- Reasons for Change to NUREG-1482, Rev. 1
  - Update Document to Reflect Changes to the ASME OM Code
  - Remove Information that is not Accurate
  - Remove Guidance that is Available in Other Documents
  - Remove/Change Implied OM Code Reliefs
  - Update Other Information

Draft NUREG-1946

- **Much More Info. from NUREG-1482 should have been included in Draft NUREG-1946**
- Guidance on Acceptable and Unacceptable Preconditioning of Pumps and Valves will be Added
- Needs to Address Several New Reactor Issues

Draft NUREG-1946

- Initial Public Comment Period Closes on January 20, 2011
- There Will Likely Be Another Public Comment Period

Use of TS SR App. for IST Tests

- **Background**
  - TS SR 3.0.3 allows licensees to extend the frequency of a missed TS Surveillance
  - Current interpretation from the NRC is that SR 3.0.3 is only applicable to TS surveillances
  - This interpretation also likely impacts TS SR 3.0.2
  - The TS Administrative Controls Section for the IST Program states that SR 3.0.3 is applicable to IST
  - NUREG-1482, Rev. 1 also notes that SR 3.0.3 is applicable to the IST Program

Use of TS SR App. for IST Tests

- **Current and Future Activities**
  - Licensees that miss an IST test should perform an operability/functionality assess. & evaluate if a relief request is needed
  - NRC staff are preparing a generic communication to explain the operational impact of this current interpretation
  - NRC staff are working with the TS Task Force to develop revs. to TSs for IST Prgm. testing
  - NRC staff are also working with the ASME OM Code to develop Code Cases to address the requirements for IST frequency & grace periods & for missed tests

Dynamic Restraints (Snubbers)

- **Background**
  - NRC staff discovered that some licensees were not following the ISI & IST requirements for snubbers as specified in 10 CFR 50.55a
  - Licensees must submit a request for relief & receive NRC approval if they are not following the requirements in 10 CFR 50.55a
  - Requests for relief are only valid for the 10-year ISI/IST period in which relief was granted

Dynamic Restraints (Snubbers)

- **RIS & EGM**
  - Regulatory Issue Summary (RIS) 2010-06 reminded licensees of the NRC's requirements for snubber inspection & testing
  - Enforcement Guidance Memorandum (EGM)-10-001 provided enforcement discretion after issuance of RIS 2010-06 for violations of 10 CFR 50.55a associated with ISI & IST of snubbers

U.S.NRC
UNITED STATES NUCLEAR REGULATORY COMMISSION
Protecting People and the Environment

Dynamic Restraints (Snubbers)

- **EGM Specifics & Expectations for Licensees**
  - EGM allowed enforcement discretion for six months after the RIS was issued if:
    - Licensees enter any snubber noncompliances into their corrective action program
    - Implement adequate compensatory measures for noncompliances
    - Appropriately evaluate any operability/functionality effects on SSCs
  - For licensees that meet the requirements for discretion described above, an additional 18-month period of discretion is allowed for:
    - Correction of identified noncompliances
    - Adequate compensatory measures must be maintained

Dynamic Restraints (Snubbers)

- **Future NRC Activities**
  - NRC plans to issue an inspection procedure to review the compliance of licensees' snubber programs with 10 CFR 50.55a requirements

Other Issues

- **10 CFR 50.55a Rulemaking**
  - New Rule will incorporate by Reference the 2005 & 2006 Addenda of the ASME OM Code
  - Final Rulemaking is scheduled for completion by May 1, 2011
  - Reg. Guide 1.193, Rev. 3, “ASME Code Cases Not Approved for Use,” was issued in October 2010
  - Proposed Rulemaking & Reg. Guides 1.192, Rev. 1, “O&M Code Case Acceptability, ASME OM Code” & 1.193, Rev. 4 should be issued for public comment in the Spring of 2011

Other Issues

- **10 CFR 50.69 Alternative Treatment Inspection Procedure**
  - Will be shared with the nuclear industry (via NEI) in early 2011
  - Procedure focuses on the most risk significant aspects of implementation of 10 CFR 50.69
  - Inspections will be performance based
  - Final Inspection Procedure to be issued in the Summer of 2011

Other Issues

- **ASME/NRC 2011 Symposium**
  - Will take place in Rockville, MD on August 15th & 16th 2011
  - Abstracts for papers due by December 17, 2010
  - Includes discussion of issues related to IST of pumps and valves & ISI and IST of snubbers
  - Will also include info. exchange on new reactor IST issues
  - Final Papers due on May 13, 2011

U.S.NRC
UNITED STATES NUCLEAR REGULATORY COMMISSION
Protecting People and the Environment

QUESTIONS