

Objectives

- ▶ Identify the SFCP concept
- ▶ Describe what surveillances are in the SFCP scope
- ▶ Identify areas reviewed in the Engineering evaluation

Objectives

- ▶ Recognize the scope of the Risk evaluation
- ▶ Describe the role of the IDP
- ▶ Identify ongoing activities after the STI is revised

What is the SFCP?

- ▶ The SFCP is a program where a licensee can change the frequency of a surveillance requirement without prior NRC approval.

What is the Surveillance Frequency Control Program?

- ▶ SFCP controls added to Admin TS
- ▶ Frequencies relocated from TS to SFCP.
- ▶ Frequencies initially relocated “as is.”
- ▶ Risk-informed methodology (NEI 04-10) used to evaluate changes to Frequencies
- ▶ Surveillance Requirements remain unchanged.

Scope

- ▶ Fixed periodic (time-based) surveillances included (e.g., once per ...)
- ▶ Event-based/periodic time-based surveillances included
- ▶ Event-based only surveillances excluded
- ▶ Event-based/one-time only time component surveillances excluded (e.g., within)
- ▶ Frequencies driven by other requirements excluded
 - ISI/IST Programs
 - Primary Containment Leak Rate Testing Program

What does the SFCP look like?

- ▶ SFCP Requirements :
 - Program provides controls for Frequencies
 - SRs are performed at intervals to assure the associated LCOs are met
 - a. SFCP shall contain a list of Frequencies controlled by the program
 - b. Changes to the Frequencies shall be made in accordance with NEI 04-10
 - c. The provisions of SRs 4.0.2 and 4.0.3 are applicable to Frequencies in the SFCP

Old Surveillance Requirement Wording

SURVEILLANCE	FREQUENCY
SR 3.3.1.1 Perform CHANNEL CHECK.	12 hours.

New Surveillance Requirement Wording

SURVEILLANCE

SR 3.3.1.1

Perform CHANNEL CHECK.

FREQUENCY

In accordance
with the Surveillance
Frequency Control
Program.

New “List of Surveillance Frequencies”

SURVEILLANCE REQUIREMENT	DESCRIPTION	FREQUENCY
SR 3.3.1.1	Perform CHANNEL CHECK.	12 hours

Process

- ▶ Select a Candidate
- ▶ Propose a New Frequency
- ▶ Evaluate the Proposed Change
- ▶ Review/Approve
- ▶ Implement
- ▶ Monitor

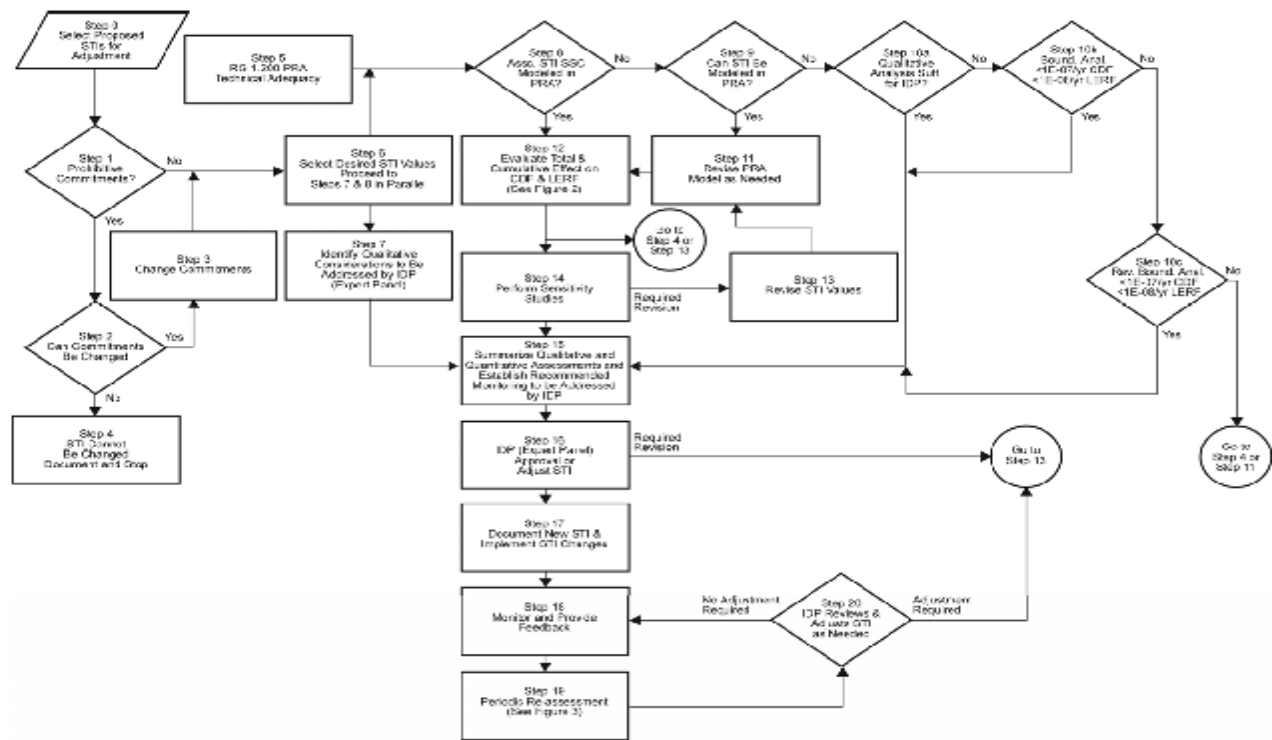


Figure 1. Surveillance Frequency Control Program Change Process

Select a Candidate

► Possible criteria

- Performed frequently
- Always passes
- Burden
 - Dose
 - Reactivity or safety system challenge
 - Work coordination challenge
 - Equipment Reliability challenge
- Previously changed frequencies

Propose a New Frequency

- ▶ Typically the next logical Tech Spec surveillance frequency
- ▶ For example:
- ▶ Monthly to quarterly

Evaluating a Proposed Change

- ▶ Determine components being tested and the Tech Spec significance
- ▶ Tech Spec Bases
- ▶ Commitment search
- ▶ ST History (5 years on-line; 10 years outage)
- ▶ Reliability review (6 years)
- ▶ Unavailability review

Evaluating a Candidate (cont'd)

- ▶ Industry operating experience
- ▶ Vendor recommendations
- ▶ Codes and Standards
- ▶ Other qualitative considerations
- ▶ Phased implementation
- ▶ Monitoring

PRA evaluation

- ▶ Evaluate STI for all risk types
- ▶ May be quantitative or qualitative
- ▶ Compared to individual and cumulative thresholds
- ▶ Includes PRA quality in scope of evaluation

Review and Approval

- ▶ Integrated Decision-making Panel (IDP)
 - Maintenance Rule Expert Panel and
 - ST Coordinator
 - Subject Matter Expert

Implement a Change

► Implementation

- Change the SFCP List of Surveillance Frequencies (Licensee-controlled document)
- Change the affected surveillance tests
- Institute Performance Monitoring indicators
- Address other affected documents and programs

Monitor Performance

- ▶ Performance monitoring to ensure performance is not degrading
 - Performed with Maintenance Rule monitoring
 - Documented in Maintenance Rule database
 - Results may determine that a return to the original frequency is warranted
- ▶ Periodic evaluation
 - Initially established at a 6-month frequency
 - Reviewed by IDP