

July 5, 2011

TSTF-11-09
PROJ0753

Attn: Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: Request to Revise Part 9900 Technical Guidance, "Operability Determinations & Functionality Assessments for Resolution of Degraded or Nonconforming Conditions Adverse to Quality or Safety"

On August 3, 2004, the NRC published a draft revision to NRC Inspection Manual Chapter (IMC) 9900, "Technical Guidance, Operability Determinations and Resolution of Nonconformances of Structures, Systems, and Components." Following issuance of the draft IMC, representatives of licensees and the NRC met to discuss comments. These comments were incorporated into Regulatory Issue Summary (RIS) 2005-20, "Revision to Guidance Formerly Contained in NRC Generic Letter 91-18, 'Information to Licensees Regarding Two NRC Inspection Manual Sections on Resolution of Degraded and Nonconforming Conditions and on Operability'" which was issued on September 26, 2005. NRC and Industry continued to meet to further improve RIS 2005-20, resulting in Revision 1 being issued on April 16, 2008. Revision 1 revised the guidance to clarify operability determinations involving American Society of Mechanical Engineers (AMSE) Code Class 2 and 3 piping.

The industry has identified a significant inaccuracy in the Part 9900 Technical Guidance document. Specifically, the Part 9900 Technical Guidance definitions for "specified function" and "specified safety function" are reversed between from the usage in the guidance document and from the usage in the Improved Technical Specifications definition of "Operability."

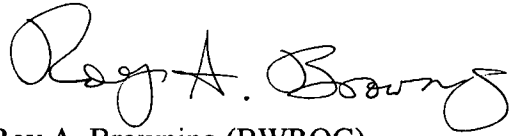
The determination of Operability is the central principle in the proper use of Technical Specifications. The Part 9900 guidance on Operability determinations is used by the NRC and the industry as a description of an acceptable process. The industry has addressed the inconsistencies in the definitions in training. However, we believe it is important that the document be revised to be internally consistent. Therefore, we request that the NRC revise the definitions of "specified function" and "specified safety function" in the Part 9900 technical guidance in accordance with the enclosure.

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Should you wish to discuss this further, please contact us.



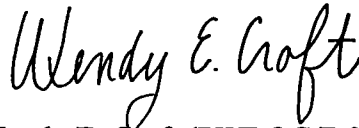
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Enclosure

Enclosure

Recommended Revision to NRC Inspection Manual Chapter (IMC) 9900, "Technical Guidance, Operability Determinations and Resolution of Nonconformances of Structures, Systems, and Components"

During the development of the Part 9900 guidance in 2005, the industry and the NRC spent considerable time ensuring that the phrases "specified function" and "specified safety function" were used correctly throughout the document. In the last draft¹ reviewed by the industry and discussed in meetings held May 10th-12th, 2005, these terms were agreed on and defined as follows:

"3.6 Functions

This section differentiates the terms "specified function" (SF), "specified safety function" (SSF), and "necessary and required support function."

3.6.1 Specified Function

A SF is a function performed by a SSC in the CLB. SFs are the functions the SSC was designed to accomplish, as described in the UFSAR and other CLB documents.

3.6.2 Specified Safety Function

The definition of operability states in part that "an SSC shall be OPERABLE or have OPERABILITY when it is capable of performing its specified safety function(s)." Specified safety functions (SSF) are a subset of the set of SFs. In the context of this manual chapter, a SSF is a function performed by a SSC described in TS. Note that not all functions of TS SSCs are considered SSFs. For each licensee, the plant-specific SSF scope derives from information relied on by the licensee and the NRC when the TS were prepared, submitted, reviewed, and approved. The SSC scope is intended to address design-basis events. For some plants, additional events beyond the scope of design-basis events (such as station blackout and ATWS), may have been included when the plant-specific SSF scope was established. SSC specified safety functions(s) are usually stated in the Bases of the TS and the plant UFSAR. The primary sources for deciding whether a specified function is a specified safety function are the application and supplements submitted by the licensee and the requests for additional information and safety evaluations prepared by the NRC in the development of the TS.²

However, after the May 2005 meetings, the NRC decided to utilize the definitions in the existing Generic Letter 91-18 guidance and issued the Part 9900 guidance as final without additional industry input. The final version of the Part 9900 guidance states:

"Specified Function/Specified Safety Function: The specified function(s) of the system, subsystem, train, component, or device (hereafter referred to as system) is that specified safety function(s) in the CLB for the facility. In addition to providing the specified safety function, a system is expected to perform as designed, tested and maintained. When system capability is degraded to a point where it cannot perform with reasonable expectation or reliability, the system should be judged inoperable, even if at this instantaneous point in time the system could provide the specified safety function."

¹ ADAMS Accession Number ML051520361, June 1, 2005.

² ADAMS Accession Number ML051520373, June 1, 2005.

Enclosure

Recommended Revision to NRC Inspection Manual Chapter (IMC) 9900, "Technical Guidance, Operability Determinations and Resolution of Nonconformances of Structures, Systems, and Components"

The Generic Letter 91-18 guidance used the terms "specified function" and "specified safety function" from the definition of Operability in use before the issuance of the Improved Standard Technical Specifications (ISTS) in 1992. In that definition, the terms "specified function" and "specified safety function" were reversed from the usage in the ISTS definition, which was the definition used when developing the Part 9900 technical guidance. As a result, the definitions used in the published Part 9900 guidance are inconsistent with the use of the terms throughout the rest of the document.

The definitions from the May 2005 meeting are consistent with the usage of the terms throughout the guidance document and also add needed clarify to the terms. The definitions will assist the NRC and licensees in identifying those features of an SSC that are necessary for the Operability of a system by identifying the plant-specific licensing basis to be considered. The definitions are consistent with the content of Technical Specifications described in 10 CFR 50.36 and the NRC's Final Policy Statement on Technical Specifications Improvements at Nuclear Power Plants. Therefore we recommend the definitions of Specified Function and Specified Safety Function be changed to those shown above and as stated in the June 1, 2005 NRC draft (ML051520373).