

### 8.2.1.3 Nonsafety-Related SSCs that are used in Emergency Operating Procedures

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

- Nonsafety-related SSCs that are necessary to be in the Maintenance Rule scope by this paragraph are those explicitly used in the EOPs that provide a mitigating function. SSCs used in plant EOPs are required for mitigation of the event/symptom that necessitated entry into the EOP.
- Severe Accident Management Guidelines (SAMGs), 10 CFR 50.54(hh)(2) (Loss of Large Areas), and FLEX:
  - 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 used **only** in support of 10 CFR 50.54(hh)(2) (Loss of Large Areas) would not be in scope of the Maintenance Rule unless otherwise required by paragraph 50.65(b).
  - FLEX equipment, used solely in response to beyond-design-basis external events, and in accordance with NEI 12-06, 'Diverse and Flexible Coping Strategies (FLEX) Implementation Guidance,' would not be in scope of the Maintenance Rule unless otherwise required by paragraph 50.65(b)
- Only those SSCs under licensee control need be included in the Maintenance Rule Scope
- 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 necessary 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.
- Since the Maintenance Rule is a performance-based regulation, licensees have the flexibility to add or remove SSCs from the scope of 10 CFR 50.65(b) if an adequate technical basis exists for including or excluding the SSC in question.

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.

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