



NRC Public Meeting

Industry Operability Guidance Initiative

April 29, 2016

Operability Guidance Initiative

NRC Public Meeting - April 29, 2016

Agenda

- Meeting Objectives
- Problem Statement
- Team Charter
- Industry Approach
 - Process Overview
 - Defined Terms
 - Operating Experience
- Next Steps
- Future Actions
- Questions and Discussion



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Meeting Objectives

- Foster clear NRC understanding of the industry initiative, intent and desired outcomes.
- Communicate industry intentions for initiative approach and near-term schedule.
- Promote preliminary consensus regarding mutual involvement of industry and NRC.

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Problem Statement

The nuclear utility industry has not established clear guidance for performing OPERABILITY determinations for Technical Specification structures systems and components. The lack of industry guidance has resulted in inconsistent implementation and expectations. Operability determinations and associated resolution of issues must be appropriately balanced to ensure focus remains on safety.



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Team Charter

- Develop industry guidance necessary to effectively and efficiently address Technical Specification equipment operability challenges.
 - Provide guidance from the perspective of plant operating staff
 - Eliminate industry reliance on NRC inspector guidance
 - Ensure alignment with regulatory requirements
- Incorporate industry and NRC feedback, achieve conceptual agreement among stakeholders.
- Publish NEI guidance document as basis for utility-specific procedures.
- Pursue NRC endorsement of industry guidance.

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Industry Participation

- Sponsor – NEI Regulatory Issues Working Group
- Team membership and participation
 - Nuclear Utilities
 - Respected Industry Experts
- Industry Support
 - Boiling Water Reactor Owners' Group
 - Pressurized Water Reactor Owners Group
 - Technical Specification Task Force
 - Nuclear Energy Institute



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Industry Approach

- Develop standard definitions and process
- Ensure process and definitions are tied to NRC regulations and Technical Specifications.
- Provide supporting operating experience.
- Restore GL 91-18 separation of concepts.

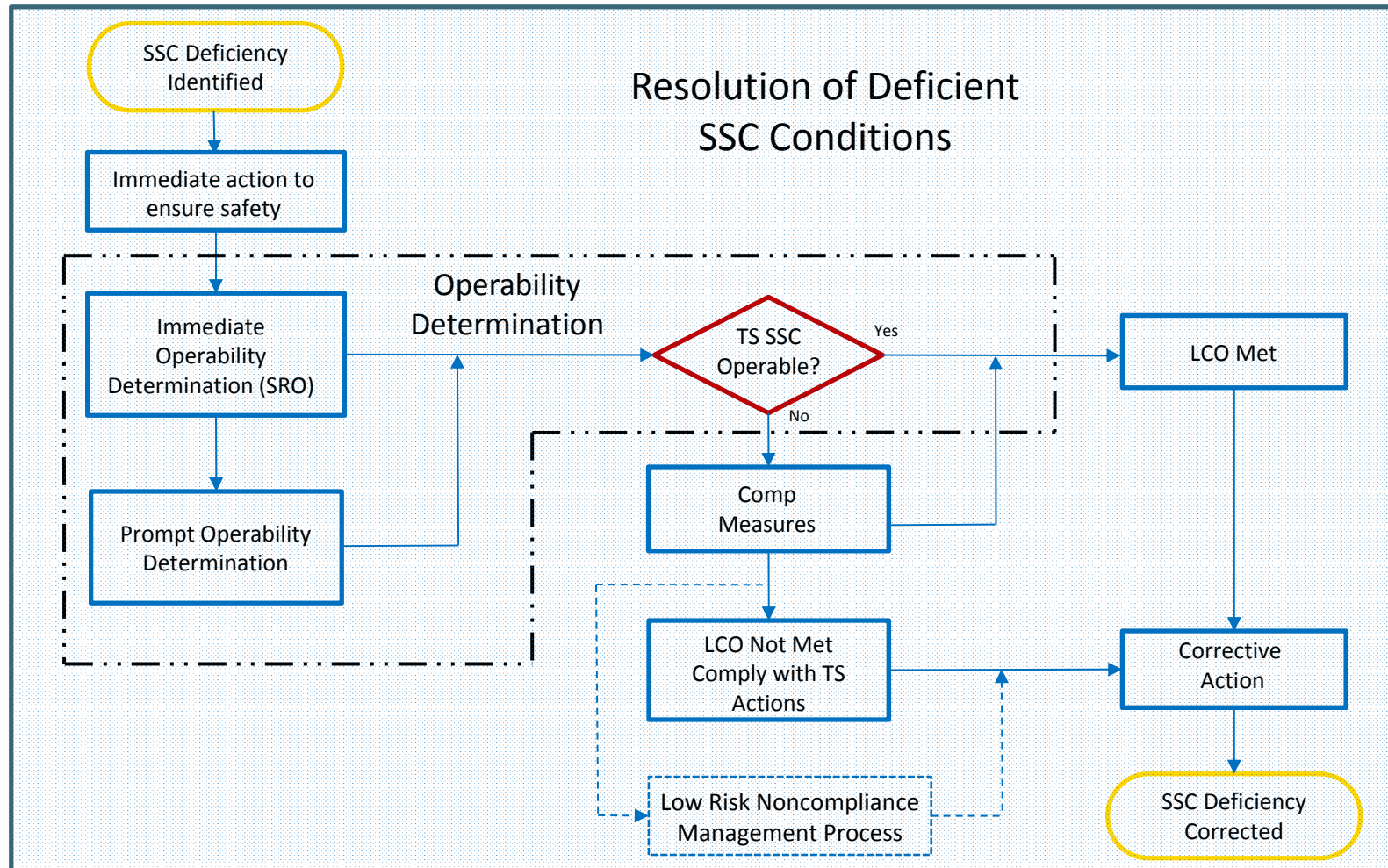
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Industry Approach

- Operability
 - Focus on capability of performing specified safety function.
 - Recognize a graded approach to use of analysis including appropriate use of engineering judgment.
- Resolution of Degraded and Nonconforming Conditions
 - Ensure timely and effective corrective action
 - Comply with regulatory and procedural requirements
- Provide tie to low risk non-compliance initiative.

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Process Overview



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Defined Terms*

- Operable – Operability
- Specified Safety Function
- Alternative Analytical Methods
- Degraded Condition
- Nonconforming Condition
- Presumption of Operability
- Compensatory Actions

* Examples are provided for discussion purposes only – definitions are subject to change as document is developed.

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Operating Experience

- To be used to illustrate concepts in guidance document.
- Will include both industry *Operating Experience* examples and *Frequently Asked Questions*
- Maintained as a separate appendix to allow independent revision and updates.

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Next Steps

- Compilation of operating experience
- Internal review of initial drafts and compiling into appropriate documents
- Industry review and comment on initial draft
- June 2016 - Public meeting to continue process discussions and solicit NRC feedback
- August 2016 - Follow-up public meeting to present proposed guidance and initiate NRC review

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Future Actions

- Completion of NRC and industry review
- Issuance of NEI guidance
- Pursuit of NRC endorsement
- Change management and training
- Utility incorporation
- Effectiveness review and long-term monitoring

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Questions and Discussion