

1 **Types of Licensee-Initiated LB Changes**

2 A licensee may propose to change the plant's licensing basis on a permanent or temporary basis.
3 A permanent change would result in permanently changing the current licensing basis; that is, the
4 proposed change would permanently alter the current plant design, operation, or other activity. For
5 example, a permanent change could involving permanently adding additional equipment, changing the
6 weld locations for inspection under the inservice inspection program, changing the testing frequency of
7 the integrated leak rate testing program, or changing the completion time for a specific technical
8 specification action. A temporary change would not involve a permanent change to the existing licensing
9 basis, but only for a temporary basis; that is, the proposed change would only temporarily alter the current
10 plant design, operation or other activity. These type changes are typically to address a specific activity or
11 condition that occur very infrequently or expected to only be implemented one time (e.g., every 20 years).
12 For example, changing the completion time for a specific technical specification action to allow the 20-
13 year maintenance overhaul of a piece of equipment or repair a piece of equipment that is expected to
14 exceed the current allowed completion time, after which the technical specification reverts back to its
15 current completion time

16 In both types of licensing basis changes (permanent or temporary), the actual implementation of
17 the licensing basis change can involve temporary changes to the plant's design, operation, or other
18 activities (clearly, only permanent licensing basis changes can result in permanent changes to the design,
19 operation, or other activity). As an example and as described above, technical specification completion
20 times can be changed permanently or on a temporary basis, depending on the intent of change. However,
21 in both cases the implementation of the technical specification action involves allowing temporary
22 changes to the plant's configuration. For example, a technical specification completion time may be
23 proposed to be changed permanently to allow more routine maintenance activities to be performed during
24 operations instead of during refueling outages, while the same technical specification completion time
25 may be proposed to be changed temporarily to allow the performance of a major overhaul of the
26 equipment on an one-time basis. In both cases, the technical specification action allows the licensee to
27 enter a different plant operating configuration; in this example case allowing a normally available piece of
28 equipment to be out of service for some specified, temporary period of time after which it is returned to
29 service consist with the design and operational basis of the plant.