



Surveillance Frequency Control Program

UFSAR Change Considerations

Phil Couture
Manager, Fleet Licensing Programs
March 20, 2018



Applicability

NEI 96-07 (Section 4.1.2) recognizes that maintenance activities are not subject to 50.59

“Maintenance activities **are not subject to 10 CFR 50.59**, but are subject to the provisions of 10 CFR 50.65(a)(4) as well as technical specifications.”

“**Changes to procedures for performing maintenance are made in accordance with applicable 10 CFR Part 50, Appendix B, criteria** and licensee procedures...**10 CFR 50.59 does not apply** to such changes because...changes to procedures for performing maintenance do not permanently alter the design, performance requirements, operation or control of SSCs.”

Applicability

Per NEI 96-07 (Section 4.1.2), 50.59 applies to maintenance activities in the following cases:

- “The plant is **not restored to its original condition** upon completion of the maintenance activity (e.g., if SSCs are removed, the design, function or operation is altered, or if temporary alteration in support of the maintenance is not removed). In this case, 10 CFR 50.59 would be applied to the permanent change to the plant.”
- Temporary alterations in place greater than 90 days

Applicability

NEI 96-07 (Section 4.1.2) contains guidance on updating the UFSAR for changes to surveillance frequencies

“If a change to a maintenance procedure affects information in the UFSAR (e.g., a specific test or maintenance frequency), the affected information should be updated in accordance with 10 CFR 50.71(e).”

Applicability

NEI 96-07 (Section 4.1.3) recognizes that not all UFSAR changes are governed by 50.59

“[M]odifications to the UFSAR that are not the result of activities performed under 10 CFR 50.59 **are not subject to control under 10 CFR 50.59.**”

Applicability

10 CFR 50.65(a)(3) requires performance and condition monitoring and requires adjustments to be made based on operating experience (i.e., surveillance test failures)

Steps 18-20 of NEI 04-10 incorporate performance monitoring and check-and-adjust feedback mechanisms

Treatment of UFSAR Changes

ASSUMPTIONS

- Change to a TS surveillance frequency using the SFCP results in need to revise the UFSAR
- Affected UFSAR section references a industry code or standard upon which the prior (i.e., pre-SFCP change) surveillance frequency was based
- The change to the TS surveillance frequency results in a deviation from the industry code or standard referenced in the UFSAR for the surveillance frequency only
- An FSAR-described industry code or standard is not a regulatory commitment, per the definition of regulatory commitment in NEI 99-04

Treatment of UFSAR Changes

PROCESS

1. NEI 04-10 evaluation provides justification for extending a surveillance frequency and revising the SFCP
2. Associated maintenance procedures are updated in accordance with 10 CFR 50 App B criteria
3. Corresponding UFSAR change is made in accordance with 10 CFR 50.71(e) with justification provided by steps 1 and 2 above

Summary

- 10 CFR 50.59 does not apply to changes to maintenance activities, with exceptions
 - Maintenance activities are governed by 10 CFR 50.65(a)(4) and TS
 - NEI 04-10 evaluation provides justification for extending a TS surveillance frequency and revising the SFCP
 - NEI 04-10 incorporates 10 CFR 50.65(a)(3) performance monitoring
 - Procedure revisions to reflect changes to surveillance frequencies, including those specified in FSAR codes/standards, are controlled as maintenance activities under 10 CFR 50.65 and 10 CFR 50 App B
- Not all UFSAR changes are governed by 10 CFR 50.59
 - Corresponding UFSAR changes for TS surveillance frequency extensions are made in accordance with 10 CFR 50.71(e)



QUESTIONS?

— WE POWER LIFESM —

