



Draft ISG-06 Revision 2
Licensing Approach to Addressing
Plant or Application Specific Action Items
(PSAI/ASAI)

NRC-Industry MP4 Tabletop
June 13-14, 2018

Purpose

To demonstrate and gain NRC feedback on the general approach (not specific to any of today's discussion) to licensee evaluation of the post-license amendment lifecycle activities addressed by Plant Specific Action Items (PSAI) or Application Specific Action Items (ASAI)

Case Study Scope

- Case 1 – where the PSAI can be incorporated as system level requirements, with review, analysis, and test (V&V)
- Case 2 – where one or more vendor process changes resolve one or more PSAIs, is evaluated through the LAR
- Case 3 – where the licensee commits to new and revised procedures to resolve the PSAI or the NRC reviews the Tech. Spec. changes
- Case 4 – applying current regulatory guidance

Case 1 – Requirements

- Some ASAI/PSAI can be added to the system requirements document
 - While the LAR addresses the ISG-04 aspects, implementation is part of the licensee post-SE activity
 - The vendor's V&V process and licensee's vendor oversight would track to field implementation
 - Example: “The licensee must make a determination regarding interdivisional communication [and its effect on overall timing] including justifications as noted in the individual subsections of Section 3.7.3.1 of this SE report. This determination will be reviewed by the NRC staff when an applicant requests NRC approval for the installation of a SR system based on the Tricon V10 platform.”

Case 1 – Requirements (cont'd)

- The system requirements document will establish the total system response time from sensor input to discrete output, including interdivisional data communication, to meet the Chapter 15 accident analysis assumptions.
- V&V will ensure analysis and test of response time under worst case assumptions.
- Vendor oversight ensures correct implementation of PSAIs.

Case 2 – LAR

- Some PSAI can be resolved by evaluating changes in the LAR
 - Example: “The licensee must make a determination that the [*platform*] secure development environment has not changed and confirm that the application secure development environment is the equivalent or otherwise meets the requirements of RG 1.152, Revision 3. This determination will be reviewed by the NRC staff when an applicant requests NRC approval for the installation of a SR system based on the Tricon V10 platform.”
- Approach
 - The licensee will address the vendor’s SDE program changes in the LAR

Case 3 – Procedure and TS Changes

- Some PSAI can be resolved only by evaluation of the licensee's administrative procedures and TS change.
 - Example: "Modifications to plant procedures and/or TS due to the installation of a Common Q safety system will be reviewed by the staff on a plant-specific basis."
 - Technical Specification changes are evaluated by the NRC based on the LAR
 - Plant procedure modifications are implemented by the design change, including those reflecting approved Tech. Spec. changes
- Approach
 - The NRC reviews Tech Spec changes as part of the SE.
 - Licensee procedure changes may invoke regulatory commitments

Case 4 – Current Regulatory Guidance

- Some PSAI actions are no longer included in ISG-6 Rev. 2.
 - Example: “The applicant or licensee is to make available for staff inspection the project-specific training plan which ensures the training needs of the plant staff, including operators, I&C engineers and technicians, as specified by the project, are fully achieved.”
- Approach
 - The PSAI is addressed in the LAR by citing the Licensee’s standard programs and processes, evaluating the training needs of staff and creating training materials (e.g., lesson plans, exercises, etc.) as necessary for adequacy under their current programs

Conclusion

- A path forward for resolution of the PSAIs is proposed.
- The licensee can complete PSAIs.