

Comparison of IMC 0326 (11/20/17) and NEI 18-03. Rev. F

To aid in comparison, IMC sections in the **first column have been highlighted in bold where:**

- the content has not been transferred in any form or
- the application of the IMC 0326 content has been significantly altered.

IMC 0326		NEI 18-03		Comments
Section	Description/Words	Section	Description/Words	
326-01	Purpose The first three paragraphs describe IMC 0326 usage as an aid to the inspector.	N/A	N/A	Not contained in NEI 18-03.
326-01	Purpose Fourth paragraph beginning with: The licensee's immediate and primary concern should be safe operation of the plant.	1	Introduction Last paragraph repeats the language of IMC 0326.	Transferred to NEI 18-03.
02.01	Scope of SSCs for Operability	2.1	Scope of SSCs for Operability Determinations.	Transferred to 18-03. Scope of Operability is provided in words rather than bulleted fashion.
02.02	Scope of SSCs for Functionality	N/A	N/A	NEI 18-03 does not address Functionality.
03.01	Definition of Current Licensing Basis	3.4	Licensing Basis	Transferred to NEI 18-03. IMC 0326 definition is retained.
03.02	Definition of Defect (related to ASME Code compliance)	N/A	N/A	Not contained in NEI 18-03. Operability is distinct from ASME-code compliance. (See Appendices C-12 and C.13 below.)
03.03	Definition of Degraded Condition	3.2	Deficient SSC Condition NEI 18-03 uses "Three Required Criteria" to define a subset of Deficient Conditions for ODP entry.	Not contained in NEI 18-03. Treatment of ODP entry conditions differs from IMC 0326.

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03.04	Definition of Design Basis	3.3	Design Bases Definition is retained and expanded slightly,	Transferred to NEI 18-03. Citation to Regulatory Guide 1.186 is also retained.
03.05	Definition of Flaw (related to ASME Code compliance)	N/A	N/A	Not contained in NEI 18-03. (See Definition 3.02 above.)
03.06	Definition of Fully Qualified	N/A	N/A	Treatment of ODP entry conditions differs from IMC 0326.
03.07	Definition of Functional-Functionality	N/A	N/A	NEI 18-03 does not address Functionality.
03.08, 09, 10	Definitions of: <ul style="list-style-type: none"> ➤ High Energy Systems ➤ Moderate Energy Systems ➤ NDE Indication 	N/A	N/A	Not contained in NEI 18-03. (See Definition 3.02 above and Appendices C.12 and C.13 below.)
03.11	Definition of Nonconforming Condition	3.2	Deficient SSC Condition NEI 18-03 uses "Three Required Criteria" to define a subset of 'Deficient Conditions" for ODP entry.	Not contained in NEI 18-03. Treatment of ODP entry conditions differs from IMC 0326.
03.12	Operability Declaration	1 and 4	<ul style="list-style-type: none"> ➤ Introduction ➤ Operability Determination Process First paragraphs of section 1 and section.4	Transferred to NEI 18-03.
03.13	Operable-Operability	3.7	Operable-Operability	NEI 18-03 references the Standard Technical Specifications definition.

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03.13	Operable-Operability Last paragraph that contains: In order to be considered operable, an SSC must be capable of performing the specified safety functions of its design...:	N/A	N/A	Not transferred to NEI 18-03. NEI 18-03 is oriented around the TS definition of "Operable".
03.14	Reasonable Expectation	3.10	Reasonable Expectation of Operability IMC Definition is repeated. A sentence relating Reasonable Expectation to Presumption of Operability has been added.	Transferred to NEI 18-03. Contrasted with Presumption of Operability since that concept is closely linked to the ODP entry criteria described in NEI 18-03.
03.15	Specified Function/Specified Safety Function	3.8	Specified Function/Specified Safety Function A revised definition is included.	A new definition of specified safety function is provided. Expanded background information is provided in Appendix B.
0326-04	Operability Determination Process First paragraph	N/A	N/A	Largely inspector guidance.
04.01	Review Activities	4.1	Three Required Entry Criteria First paragraph repeats "continuous process."	Less detail is provided regarding the potential sources of information
04.02	Assessing Potential Degraded or Nonconforming Conditions	4.1	Three Required Entry Criteria Entry into the Operability Determination Process is described as meeting the Three Required Criteria.	The concept of "TRC" has replaced "potential degraded and/or nonconforming conditions."
04.03	Presumption of Operability	3.9, 4.1	Presumption of Operability A more concise definition is provided in section 3.9 and a practical test is described in section 4.1. (See third paragraph.)	The wording has been altered but the concept's application is the same. TRC are utilized as a more objective standard.

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04.04	Scope of Operability Determinations	4.3.1	Sufficiency of Operability Determination This section generally repeats the IMC information.	Use of Compensatory Measures is included along with a pointer to the use of a graded approach.
04.05	Circumstances Warranting Operability Determinations	4.1	Three Required Entry Criteria Entry into the Operability Determination Process is described as involving Three Required Criteria.	The concept of "TRC" has replaced "potential degraded and/or nonconforming conditions."
04.06.01 04.06.02	Timing of Operability Determinations	4.2.1, 4.2.2	Immediate and Prompt Determination of Operability	Guidance is transferred to NEI 18-03.
04.07	Documentation	4.2	Documentation of Operability Determinations	Guidance regarding the use of a "checked box" is expanded along with the application of a graded approach.
04.08	Operator Awareness and Responsibilities	4.0, 4.1,4.2.1, 4.2.2,4.3.2	Various sections	No change in intent, but the section's title has been eliminated.
05.01, 05.02	Functional, Nonfunctional	N/A	N/A	NEI 18-03 does not address Functionality.
06.01	Inoperable	5.1.1	SSC Inoperable	Generally consistent.
06.02	Operable but Degraded or nonconforming	5.1.2	SSC Operable	Background information and information regarding other regulations was not transferred.
06.03	Operability is Separate from Corrective Action to Restore Full Qualification	Appendix C.1	Relationship Between Operability and the Corrective Action Program	Information transferred to NEI 18-03.

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06.04	Enforcement Discretion	N/A	N/A	NEI 18-03 is not an instructional source of information on enforcement discretion. Information is not transferred to NEI 18-03.
07.01	The Current Licensing Basis and 10 CFR Part 50, Appendix B	N/A	N/A	NEI 18-03 is not an instructional source of information on CLB and Appendix B. Corrective Action Program background information is not transferred to NEI 18-03.
07.02	Timing of Corrective Actions	Appendix C.2	Timing of Corrective Actions	Information is transferred to NEI 18-03. The main body of NEI 18-03 does not address Corrective Actions.
07.03	Compensatory Measures	3.1,4.2, 4.3.1, Appendix A.3	Various Section titles. They all provide consistent guidance regarding the use of Compensatory Measures.	NEI 18-03 provides guidance consistent with IMC 0326.
07.04 07.04.01 07.04.02	Final Corrective Action	Appendices C.3, 4, and 5	<ul style="list-style-type: none"> ➤ Final Corrective Action ➤ Change to Facility or Procedures in Lieu of Restoration ➤ Acceptance of an As-Found Condition 	Information is transferred to NEI 18-03. The main body of NEI 18-03 does not address Corrective Actions.
Appendix A.01	Operability During Technical Specification Surveillances	A.8	Operability During Technical Specification Surveillances	Selected information transferred to NEI 18-03.
Appendix A.02	System Configuration During Surveillance and Operability Testing	A.8	Operability During Technical Specification Surveillances	Selected information transferred to NEI 18-03.

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Appendix A.03	Missed Technical Specification Surveillance	N/A	N/A	Information was not transferred to NEI 18-03. Missed surveillances are not relevant to operability determinations
Appendices B.01, B.02, B.03, B.04	Maintenance	N/A	N/A	Information was not transferred to NEI 18-03. (See immediately below.)
Appendix B.04	Reduced Reliability as a Degraded or Nonconforming Condition	A.9 4.1	Reduced Reliability	The concept has been transferred to NEI 18-03. The TRC incorporates reduced reliability.
Appendices C.01, C.02,	➤ Relationship Between the General Design Criteria (GDC) and the Technical Specifications Single Failures	N/A	N/A	Information was not transferred to NEI 18-03.
Appendices C.3, C.4	➤ Treatment of Consequential Failures in Operability Determinations ➤ Use of Alternative Analytical Methods in Operability Determinations	A.1, A.2	➤ Consequential Failures in Operability Determinations ➤ Use of Alternative Analytical Methods to Determine Operability	IMC 0326 Appendices were transferred to NEI 18-03.
Appendix C.05	Use of Temporary Manual Action in Place of Automatic Action in Support of Operability	A.3	Compensatory Actions	Guidance has been integrated to Appendix A.3
Appendix C.06	Use of Probabilistic Risk Assessment in Operability Decisions	A.4	Consideration of Probability and Risk in Operability Determinations	Transferred to NEI 18-03 with minor changes discussing technical rigor.
Appendix C.07	Use of Seismic Margin Assessment in Operability Decisions	N/A	N/A	Not contained in NEI 18-03.
Appendix C.08	Environmental Qualification	N/A	N/A	Not directly contained in NEI 18-03.

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Appendix C.09	Technical Specification Operability vs. ASME OM Code Criteria	A.7	Technical Specification Operability vs. ASME Code Criteria	NEI 18-03 addresses relationship but is not consistent with IMC 0326.
Appendix C.10	Support System Operability	A.11 3.6	<ul style="list-style-type: none"> ➤ Support System Operability ➤ Necessary Support Function 	Transferred to NEI 18-03. Definition 3.6, "Necessary Support Function", was added.
Appendix C.11	Piping and Pipe Support Requirements	A.5	Piping and Pipe Support Requirements	Citations of Regulatory Guide 1.199, ACI-349, and SQUG GIP-2 were transferred.
Appendix C.11	Piping and Pipe Support Requirements	A.5	Piping and Pipe Support Requirements	Guidance that links prior NRC approval to Operability was not transferred.
Appendices C-12 and C-13	<ul style="list-style-type: none"> ➤ Flaw Evaluation ➤ Operational Leakage from ASME Code Class 1, 2, and 3 Components 	A.10	Flaw Evaluation ASME Class 1 boundaries are assessed as providing a "required and necessary support function for various ECCS systems. Code Class 1 compliance is the acceptance criteria.	Guidance that links prior NRC approval and/or 10 CFR 50.55a compliance to Operability was not transferred.
Appendix C-14	Structural Requirements	A.6	Structural Requirements	Transferred to NEI 18-03.