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Basis Summary Sheet	
Inspectable Area: Plant Modifications	
Cornerstone(s): Initiating Events, Mitigating Systems, and Barrier Integrity	Inspection Procedure: IP 71111.18
<p>Scope: Inspection activities in this area include the review of design, installation, configuration control, and post-modification testing for the potentially risk significant permanent modifications of the systems, structures, and components (SSCs) covered by the maintenance rule. Inspection activities would may also include an in-depth review of changes to the initial licensed design, design and licensing basis documents, test procedures, and normal and emergency operating procedures, severe accident management guidelines (SAMGs), and other significant plant procedures.</p> <p>Inspection activities may also include a review of site SAMGs updates when the BWROG or PWROG revise generic severe accident technical guidelines.</p> <p>Inspection activities in this area includes a review of design, installation, configuration control, and post modification testing for potentially risk significant temporary modifications of the systems, structures, and components (SSCs) covered by the maintenance rule.</p>	
<p>Basis: Modifications to risk-significant structures, systems, and components (SSCs) can adversely affect their availability, reliability, or functional capability. Modifications to one system may also affect the design bases and functioning of interfacing systems. Similar modifications to several systems could introduce potential for common cause failures that affect plant risk. A temporary modification may result in a departure from the design basis and system success criteria. Modifications performed during increased risk configurations could place the plant in an unsafe condition.</p> <p>SRM SECY-15-0065 (ML15239A767) directed the NRC staff to update the ROP to explicitly provide periodic oversight of the industry's implementation of the SAMGs.</p> <p>Inspection of this area supports the design and design control attributes of the Initiating Events, Mitigating Systems, and Barrier Integrity cornerstones.</p>	
Performance Indicators: No performance indicators have been established that can provide results related to the adequacy of plant modifications.	
<p>Significant Changes in Scope or Basis:</p> <p>January 2008 - IP 71111.18, "Plant Modifications," was created. This new IP combined previous aspects of IP 71111.17, "Permanent Plant Modifications" and IP 71111.23, "Temporary Plant Modifications." The changes are associated with a 2007 ROP realignment effort as indicated in SECY-08-0046 (ML073020593).</p> <p>November 2016 and Month 2018 – IP revised to provide oversight of Severe Accident Management Guidelines (SAMGs). Changes directed by SRM SECY-15-0065 (ML15239A767).</p>	

Issue Date: To be included in next IMC 0308 Attachment 2 revision (no later than Spring 2019)

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Figure 18 Plant Modifications Basis Summary Sheet (IP 71111.18)

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