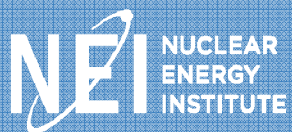


# Operability Determination

Relationship between Code  
Compliance and Operability

February 15, 2019



©2018 Nuclear Energy Institute





# Overview

- Six areas identified to gain efficiency and predictability in the Operability Determination process
  - Establishing that operability is the responsibility of the licensee
  - Defining entry criteria
  - Separating operability determination from CAP
  - Aligning on definitions of terms, such as “specified safety function”
  - Eliminating aspects not specifically tied to operability
  - **Ensuring the Operability Determination process is separate from Code compliance determinations**



# NEI 18-03 Principles

- Ensuring the Operability Determination process is separate from Code compliance determinations
  - Determination of operability is separate from Code compliance
  - Any technically acceptable method can be used to determine if a specified safety function can be met (alternate methods)
  - Licensed operator decision - NRC approval not required if technically defensible method used to determine operability
  - Restoration of compliance falls under the Corrective Action Program and may require NRC approval



# NEI 18-03

- These principles were used in the following sections.
- A.5 Piping and Piping Support Requirements
- A.6 Structural Requirements
- A.7 Technical Specification Operability vs. ASME OM Code Criteria
- A.10 Flaw Evaluation



## NEI 18-03

- A.5 Piping and Piping Support Requirements
  - Provides helpful references consistent with IMC-0326
  - Operability is based on ability to perform the specified safety function
  - Operability is the licensee's determination



## NEI 18-03

- A.6 Structural Requirements
  - Provides references consistent with IMC-0326
    - ◆ These items may be helpful in the operability determination
  - Operability is based on ability to perform the specified safety function
  - Operability is the licensee's determination



## NEI 18-03

- A.7 Technical Specification Operability vs. ASME OM Code Criteria
  - Made the distinction between operability and compliance with ASME OM Code.
  - Referenced section 4, “Operability Determination Process” when in-service testing (IST) performance data falls outside of the required action range.
    - ◆ Need to address TS SRs that rely on IST versus safety analysis as the acceptance criteria



## NEI 18-03

### ■ A.10 Flaw Evaluation

- Reinforced when ASME Code Class 1, 2, or 3 components do not meet ASME or construction Code acceptance standards, operability should be assessed
  - ◆ Emphasized the importance of ASME Code Class 1 pressure boundary components and impact on operability based on safety significance
- Operational leakage in ASME Class 1, 2, or 3 components are assessed as deficient conditions
  - ◆ TS limits typically exist for RCS leakage
- Operability is the licensee's determination
  - ◆ Restoration of code compliance is addressed through the corrective action program





## Summary

- The Operability Determination process is separate from Code compliance determinations
  - ◆ Determination of operability is separate from Code compliance
  - ◆ Any technically acceptable method can be used to determine if a specified safety function can be met (alternate methods)
  - ◆ Licensed operator decision - NRC approval not required if technically defensible method used to determine operability
  - ◆ Restoration of compliance falls under the Corrective Action Program and may require NRC approval



## Next Steps

- NRC feedback on Code Compliance/Operability
  - ◆ April 3<sup>rd</sup> at Region II HQ
- Align on plan going forward in preparations for final meeting targeted in June
  - ◆ NEI-18-03 comment resolution
  - ◆ IMC-0326 changes