

IDENTIFIED

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ISSUE DATE: 3/2/81

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MINUTES OF THE
ACRS SUBCOMMITTEE MEETING ON PLANT FEATURES IMPORTANT TO SAFETY
FEBRUARY 3, 1981
1717 H ST., NW, WASHINGTON, DC

The ACRS Subcommittee on Plant Features Important to Safety held a meeting on February 3, 1981 in Room 1167, 1717 H St., NW, Washington, DC. The purpose of the meeting was for the Subcommittee to discuss with the NRC Staff the definitions of the terms, "safety grade," "safety related," and "important to safety" as developed for testimony related to the Three Mile Island, Unit 1 restart, as well as review the generic implications of these definitions in the licensing process. The NRC Staff had asked for for an ACRS opinion regarding these definitions. The meeting was entirely open to the public. The Designated Federal Employee for this meeting was Richard Major. Mr. J. Gallagher representing an ad hoc group established between the IEEE and the NRC Staff made a brief presentation and submitted related slides. Subsequent to the meeting, Mr. Gallagher has made available a draft version of an IEEE Trial Use Guide: A Method for Determining Requirements for Instrumentation, Control and Electrical Systems Equipment Important to Safety. This is on file at the ACRS Office. Notice of this meeting appeared in the Federal Register, Vol. 46, No. 12, on Monday, January 19, 1981. A list of attendees is enclosure 1.

MEETING WITH NRC STAFF

Mr. Ward noted in his opening remarks that as a result of contentions in the TMI-1 restart hearings, the Staff has found it necessary, as well as helpful, in organizing its own thinking to develop concise definitions for the terms: "important to safety," "safety grade," and "safety related."



The term "important to safety" is found in 10 CFR 50, Appendix A of the General Design Criteria. The term applies to those structures, systems, and components that provide reasonable assurance that the facility can be operated without undue risk to the health and safety of the public.

The term "safety grade" is not explicitly used in the regulations, but its usage as applied by the Staff is derived from 10 CFR 100, Appendix A. It includes structures, systems, and components (designed to remain functional for the Safe Shutdown Earthquake) necessary to assure (1) the integrity of the reactor coolant pressure boundary, (2) the capability to shut down the reactor and maintain it in a safe shutdown condition, or (3) the capability to prevent or mitigate the consequences of accidents which could result in potential offsite exposures comparable to the guidelines in 10 CFR 100.

The term "safety related" is defined in the regulations (10 CFR 50, Appendix B) in the context of quality assurance program requirements. The term is used in Regulatory Guides and the Standard Review Plan in contexts other than quality assurance. The Office of Standards Development (OSD) had proposed a change to the regulations that would establish "safety related" and equivalent to "important to safety." The Office of Nuclear Reactor Regulation (NRR) has opposed this proposal by Standards because, in other than the quality assurance contexts, "safety related" has been widely used as equivalent to "safety grade." At this point, the definition has not been finally decided. [Note: The attached January 29, 1981 memorandum for H. Denton from D. Ross, Subject: Non-Concurrence on "Proposed Amendment to 10 CFR 50 Appendix A to Clarify

Quality Assurance Program Requirements," gives additional details on this subject. Since the meeting, NRR, OSD, and ELD all agree that the term "safety related" is equivalent to "safety grade" as defined in James Conran's TMI-1 restart testimony to UCS Contention #14. Proposed changes to 10 CFR 50 Appendix A and Appendix B are given in Enclosure 1 to the January 27, 1981 memo. This documentation was provided to the Subcommittee subsequent to the meeting.]

Mr. Ward noted that, in general, safety grade is a subset of important to safety.

Mr. Ward saw as a parallel, if not the same issue, the question of a graded quality assurance system. The Staff has expressed some unhappiness with industry's all or nothing approach to quality assurance. Quality assurance philosophers, in general, would like to see quality assurance applied commensurate with risk. This suggests defining subsets of "important to safety," as one way of starting a graded quality assurance approach. This then serves as a tie-in between the definitions of terms and quality assurance categories.

Mr. Ward noted that the Subcommittee should consider whether to concur with a set of well thought out semantics as proposed by the Staff or whether to work with the Staff to develop definitions of a more comprehensive nature which could have some impact on how systems are designed and evaluated in the future. He noted there was a spectrum of positions the Subcommittee could adopt in between.

The Staff notes it is their immediate aim to obtain ACRS concurrence in the definitions set forth in the TMI-1 testimony. A longer term goal could be pursued in conjunction with the development of methods for ranking systems, structures, and components with respect to degree of importance to safety and appropriately grading quality assurance procedures.

Mr. Conran noted that conversationally, the Staff tends to use the terms, safety grade, safety related, and important to safety interchangeably a great deal. The terms do however have considerably different meanings in the regulations and regulatory guidance. The Staff's objective at the meeting was to discuss the two terms that the Staff has defined in the course of the TMI-1 restart hearing that is, safety grade and important to safety, and ask for Committee comments, if any, or concurrence if the Committee sees nothing wrong with the way the terms are defined. Mr. Conran noted the Staff has not arrived at a single definition of the term "safety related."
[Note: Subsequent to the meeting, NRR/OSD/ELD have reached agreement on a single definition of "safety related" which equates it to "safety grade".]

Mr. Bender noted that most equipment at a nuclear power plant has some relationship to safety. It is the type of relationship that must be addressed. Mr. Bender suggested that there is a need to establish how to discriminate between safety relationships that require certain kinds of engineering provisions, special design treatment, or possibly operational treatment that is different from what would occur under conventional practice.

Mr. Conran noted that the Rogovin study had said: "The NRC lacks definitions for safety-related as applied to equipment, systems, structures, and so forth necessary to ensure that Appendix B Quality Assurance standards are implemented consistently. The consequence has been an ad hoc uncontrolled application of safety-related requirements to equipment outside the reactor protection system and engineered safety features systems." This problem was addressed in the NRC Action Plan in Section I.F. The approach is to expand the "Q" list to cover all equipment important to safety, not just structures, components, or systems used to prevent or mitigate accidents. A second aspect of the plan is to rank equipment in order of its importance to safety. There are preliminary steps underway toward developing a graded quality assurance program.

Mr. Conran noted that the term, "important to safety" encompasses the broad class of plant features, covered (not necessarily explicitly) in the General Design Criteria, that contribute in important ways to the safe operation and the protection of the public in all phases and aspects of facility operation (i.e., normal operation and transient control, as well as accident prevention and mitigation).

Mr. Haass explained that the Quality Assurance Branch uses the term, "safety related" to describe those items on the Q-list. Those items on the Q-list include items considered safety-grade (seismic Category 1) plus other systems considered important to safety such as radioactive waste systems and fire protection systems. Licensees are free to include such additional items on

the list, even if the Staff doesn't consider the additional systems required for the critical safety functions identified in 10 CFR 100 Appendix A and Regulatory Guide 1.29. In general, the Q-list for each plant is composed on a case-by-case basis.

Mr. Bender suggested that in setting quality assurance requirements, consideration should be given to a piece of equipment's purpose and the conditions under which it must operate.

The Staff suggested in discussing the term, "important to safety" that there is a relationship to the consequences to the plant given a particular component fails. The more severe the consequences of a component's failure the more the assurance needed to lower the probability of the component failing.

Since the accident at TMI-2, the Staff noted that the list of safety grade equipment has not been expanded. However, there have been upgrades to the reliability of components important to safety such as the power supply to the pressurizer heaters and PORV position indication; components involved in such upgrading have been added to the "Q" list.

Mr. Bender suggested a set of definitions as follows:

- Importance to safety is a measure of the consequences of failure.
- Safety grade is a measure of quality needed to serve a safety function.
- Safety related refers to the conditions under which the safety function is to be performed.

[Following the meeting, the Staff has commented that this is a sensible approach and preferable semantically (from the viewpoint of common sense usage of the terms) to the set of definitions currently in use. However, the Staff stressed the fact that the main drawback in going to such a set of definitions in the short term is the enormous amount of editorial effort required to incorporate these definitions into existing standard review plans and regulatory guides. The set of definitions presented in James Conran's TMI-1 testimony have been established by practice and would not require significant editorial effort.]

Mr. Haass explained that the Quality Assurance Branch for the purposes of 10 CFR 50, Appendix B applicability separates plant structures, systems, and components into two groups -- "important to safety" and its subgroup, "safety related." The safety related grouping contains those structures, systems, and components needed to prevent or mitigate the consequences of postulated accidents as defined by 10 CFR 50, Appendix B and Regulatory Guide 1.29. QA controls satisfy Appendix B and it is required that they be applied in a manner consistent with an item's importance to safety as stated in Criterion 2 of Appendix B. Items important to safety are those remaining structures, systems, and components in the plant that have some effect on safety (needed to provide reasonable assurance that the facility can be operated without undue risk. Quality assurance controls satisfy General Design Criterion 1 of Appendix A (the Staff has not developed detailed requirements for such a QA program).

Mr. Haass noted that the Staff is proposing for the future to clarify the applicability of 10 CFR 50, Appendix B to all items important to safety. The basis for this action is derived from Appendix A to 10 CFR 50. Currently, the Staff does not have such a list. The TMI Action Plan describes such a list. The Staff has issued a position to TMI-1, Zion 1&2, and Indian Point 2&3 to develop an expanded Q-list to include all structures, systems, and components important to safety. The Staff has commented since the meeting that they do have the basis for such a list. It would include structures, systems, and components identified explicitly in the General Design Criteria, the Standard Review Plans, and Regulatory Guides.

Mr. Gallagher, who chairs an ad hoc group that was established through a joint agreement with the NRC Office of Standards Development and the IEEE, made a brief presentation. The scope of this group (IEEE P827) is to prepare a document that sets criteria for determining the level of importance to safety of the instrumentation, control, and electrical portions of nuclear power generating station systems not covered by IEEE Std. 603. Methods are provided for determining the design basis for each of these systems and for determining the degree of applicability of the requirements of other standards to each of these systems. This determination is based on the level of importance to safety of each system.

The purpose of the document to be prepared by the group is to present a uniform classification approach for determining the applicability of design criteria and design requirements for nuclear power generating station systems, based on the level of their importance to safety.

The basic thought was to develop a graded approach. In this light, requirements already in place could be judged for applicability, in some cases restrictions could be relaxed if safety functions were not as important with respect to the consequences of failure.

Mr. Medeiros from the NRC Office of Standards Development made a statement. He said it was his opinion that there is a lack of technical excellence in the area of plant control. He was also disturbed at the level of review for instrumentation and control equipment. He noted control room design needs attention.

The meeting was adjourned at 4:45 p.m.

NOTE: For additional details, a complete transcript of the meeting is available in the NRC Public Document Room, 1717 H St., NW, Washington, DC 20555 or from Alderson Reporters, 300 7th St., SW, Washington, DC, (202) 554-2345.

the NRC Draft Long-Range Research Plan.

Further information regarding topics to be discussed, whether the meeting has been cancelled or rescheduled, the Chairman's ruling on requests for the opportunity to present oral statements and the time allotted therefor can be obtained by a prepaid telephone call to the cognizant Designated Federal Employee, Mr. Sam Duraiswamy (telephone 202/634-3267) between 8:15 a.m. and 5:00 p.m., EST.

Dated: January 14, 1981.

John C. Hoyle,

Advisory Committee Management Officer.

[FR Doc. 81-1903 Filed 1-19-81, 9:48 am]

BILLING CODE 7590-01-01

Advisory Committee on Reactor Safeguards, Subcommittee on Plant Features Important to Safety Meeting

The ACRS Subcommittee on Plant Features Important to Safety will hold a meeting at 1:00 p.m. on February 3, 1981 in Room 1167, 1717 H Street, N.W., Washington, DC to begin discussion of the NRC definitions of plant features important to safety and related criteria for such systems developed by the NRC Staff in connection with the TMI-1 restart review.

In accordance with the procedures outlined in the Federal Register on October 7, 1980 (45 FR 66535), oral or written statements may be presented by members of the public, recordings will be permitted only during those portions of the meeting when a transcript is being kept, and questions may be asked only by members of the Subcommittee, its consultants, and Staff. Persons desiring to make oral statements should notify the Designated Federal Employee as far in advance as practicable so that appropriate arrangements can be made to allow the necessary time during the meeting for such statements.

The entire meeting will be open to public attendance.

The agenda for subject meeting shall be as follows:

Tuesday, February 3, 1981

1:00 p.m. until the conclusion of business

During the initial portion of the meeting, the Subcommittee, along with any of its consultants who may be present, will exchange preliminary views regarding matters to be considered during the balance of the meeting.

The Subcommittee will then hear presentations by and hold discussions with representatives of the NRC Staff, their consultants, and other interested persons regarding this review.

Further information regarding topics to be discussed, whether the meeting has been cancelled or rescheduled, the Chairman's ruling on requests for the opportunity to present oral statements and the time allotted therefor can be obtained by a prepaid telephone call to the cognizant Designated Federal Employee, Mr. Paul Boehmert (telephone 202/634-3267) between 8:15 a.m. and 5:00 p.m., EST.

Dated: January 14, 1981.

John C. Hoyle,

Advisory Committee Management Officer.

[FR Doc. 81-1904 Filed 1-19-81, 9:48 am]

BILLING CODE 7590-01-01

Advisory Committee on Reactor Safeguards, Subcommittee on Regulatory Activities; Meeting

The ACRS Subcommittee on Regulatory Activities will hold a meeting on February 3, 1981 in Room 1046, 1717 H Street, N.W., Washington, DC. Notice of this meeting was published December 22, 1980.

In accordance with the procedures outlined in the Federal Register on October 7, 1980 (45 FR 66535), oral or written statements may be presented by members of the public, recordings will be permitted only during those portions of the meeting when a transcript is being kept, and questions may be asked only by members of the Subcommittee, its consultants, and Staff. Persons desiring to make oral statements should notify the Designated Federal Employee as far in advance as practicable so that appropriate arrangements can be made to allow the necessary time during the meeting for such statements.

The entire meeting will be open to public attendance.

The agenda for subject meeting shall be as follows:

Tuesday, February 3, 1981

The meeting will commence at 8:45 a.m.

The Subcommittee will hear presentations from the NRC Staff and will hold discussions with this group pertinent to the following:

- (1) Regulatory Guide (Task No. RS 705-4), "Lightning Protection for Nuclear Power Plants" (Post comment).
 - (2) Regulatory Guide 1.136, Revision 2, "Materials, Construction and Testing of Concrete Containments" (Post comment).
 - (3) Regulatory Guide (Task No. SC 705-4), "Ultrasonic Testing of Reactor Vessel Welds During Pre-Service and Inservice Examination" (Post comment).
- Other matters which may be of a predecisional nature relevant to reactor

operation or licensing activities may be discussed following this session.

Persons wishing to submit written statements regarding Regulatory Guides with Task numbers RS 705-4, SC 705-4, and Regulatory Guide 1.136, Revision 2, may do so by providing a readily reproducible copy to the Subcommittee at the beginning of the meeting.

However, to insure that adequate time is available for full consideration of these comments at the meeting, it is desirable to send a readily reproducible copy of the comments as far in advance of the meeting as practicable to Mr. Sam Duraiswamy, the Designated Federal Employee for the meeting in care of ACRS, Nuclear Regulatory Commission, Washington, DC 20555 or telecopy them to the Designated Federal Employee (202/634-3319) as far in advance of the meeting as practicable. Such comments shall be based upon documents on file and available for public inspection at the NRC Public Document Room, 1717 H Street, N.W., Washington, DC 20555.

Further information about topics to be discussed, whether the meeting has been cancelled or rescheduled, the Chairman's ruling on requests for the opportunity to present oral statements and the time allotted therefor can be obtained by a prepaid telephone call to the cognizant Designated Federal Employee, Mr. Sam Duraiswamy, (telephone 202/634-3267) between 8:15 a.m. and 5:00 p.m., EST.

Dated: January 14, 1981.

John C. Hoyle,

Advisory Committee Management Officer.

[FR Doc. 81-1905 Filed 1-19-81, 9:48 am]

BILLING CODE 7590-01-01

Advisory Committee on Reactor Safeguards, Subcommittee on Safety Philosophy, Technology and Criteria; Meeting

The ACRS Subcommittee on Safety Philosophy, Technology and Criteria will hold a meeting at 3:00 p.m. on February 4, 1981 in Room 1046, 1717 H Street, N.W., Washington, DC to discuss requirements for new Near-Term Construction Permit reactor plants.

In accordance with the procedures outlined in the Federal Register on October 7, 1980 (45 FR 66535), oral or written statements may be presented by members of the public, recordings will be permitted only during those portions of the meeting when a transcript is being kept, and questions may be asked only by members of the Subcommittee, its consultants, and Staff. Persons desiring to make oral statements should notify the Designated Federal Employee as far in advance as practicable so that

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ACRS SUBCOMMITTEE MEETING ON PLANT FEATURES IMPORTANT TO SAFETY
ROOM 1167, 1717 H St., NW, WASHINGTON, DC
FEBRUARY 3, 1981

TENTATIVE SCHEDULE

APPROXIMATE TIME

1:00 p

I. OPENING REMARKS

- a. Discussion of Schedule
- b. Goals for the Meeting

1:15 p

II. BACKGROUND DISCUSSION

- a. TMI-1 Restart Hearing
- b. Definition of Terms:
 - i. important to safety -- safety related
 - ii. safety grade
- c. Where are these terms defined?
- d. What is the purpose/scope of these definitions?

2:00 p

III. TOPICS FOR DISCUSSION

- a. Is the list of items defined as "safety-grade" given in Reg. Guide 1.29 an adequate list? Does it require additions/deletions?
- b. NRC argues in testimony that improper operator action towards safety systems resulted in reliance on non-safety systems at TMI-2. What is the implications of this line of reasoning concerning such topics as operator action (before or after 10 minutes into an incident) to mitigate or end a transient?
- c. What is the relationship between definitions of safety terms and Quality Assurance (QA) requirements.
- d. Should the NRC or Industry develop a graded QA approach using multiple tiers of QA categories depending on the safety importance of the equipment?
 - i. How would such graded QA schemes be classified?
 - ii. What classification should be given to systems that could be used to mitigate accidents in lieu of a safety system?

PPROXIMATE TIME

iii. What classification should be given to systems whose failure or misuse could challenge a safety system?
How does systems interaction fit in?

e. How would the creation of a quantitative safety goal effect the distinction between various plant systems?

4:00 p

IV. SUMMATION - Briefly what the Subcommittee intends to report to the full ACRS. - Need for future discussion.

4:15 p

ADJOURNMENT

ATTENDANCE LIST
OF THE
ACRS SUBCOMMITTEE MEETING ON PLANT FEATURES IMPORTANT TO SAFETY
FEBRUARY 3, 1981
1717 H ST., NW, WASHINGTON, DC

ACRS

D. Ward, Chairman
M. Bender, Member
E. Epler, Consultant
R. Major, ACRS Staff

NRC STAFF

J. Stolz, NRR
J. Conran, NRR
W. Haass, NRR
J. Spraul, NRR
T. Dunning, NRR
H. Levin, DE
E. Rossi, NRR
H. Ornstein, AEOD
M. Medieros, SD
E. Davidson, RES
W. Morrison, SD

DOE

P. Davis

EPRI

R. Leyse

WESTINGHOUSE

J. Gallagher

ALDERSON REPORTERS

P. Minson
S. Clinkson

LIST OF DOCUMENTS AND SLIDES PROVIDED AT MEETING

1. Tentative Meeting Schedule
2. Background Slides by J. Conran, NRR Definition of Terms (10 Slides)
3. Slide used by W. Haass, Quality Assurance Branch - Quality Assurance Requirements (1 Slide)
4. Slides used by John Gallagher (IEEE), IEEE P827 Criterion for Determining Requirements for Systems Important to Safety (7 Slides)

LIST OF DOCUMENTS PROVIDED SUBSEQUENT TO MEETING

5. Memorandum for H. Denton from D. Ross, Subject: Non-Concurrence on Proposed Amendment to 10 CFR 50 Appendix A to Clarify Quality Assurance Program Requirements (Attached)
6. IEEE Trial Use Guide: A Method for Determining Requirements for Instrumentation, Control and Electrical Systems and Equipment Important to Safety (Distributed to Subcommittee on February 23, 1981)

These documents were filed with the Office Copy of these Minutes.

the NRC Draft Long-Range Research Plan.

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Dated: January 14, 1981.

John C. Hoyle,

Advisory Committee Management Officer.

[FR Doc. 81-1901 Filed 1-18-81, 8:43 am]

BILLING CODE 7590-01-8

Advisory Committee on Reactor Safeguards, Subcommittee on Plant Features Important to Safety; Meeting

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c. What is the relationship between definitions of safety terms and Quality Assurance (QA) requirements.

d. Should the NRC or Industry develop a graded QA approach using multiple tiers of QA categories depending on the safety importance of the equipment?

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ii. What classification should be given to systems that could be used to mitigate accidents in lieu of a safety system?

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iii. What classification should be given to systems whose failure or misuse could challenge a safety system? How does systems interaction fit in?

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FEBRUARY 3, 1981
1717 H ST., NW, WASHINGTON, DC

ACRS

D. Ward, Chairman
M. Bender, Member
E. Epler, Consultant
R. Major, ACRS Staff

NRC STAFF

J. Stolz, NRR
J. Conran, NRR
W. Haass, NRR
J. Spraul, NRR
T. Dunning, NRR
H. Levin, DE
E. Rossi, NRR
H. Ornstein, AEOD
M. Medieros, SD
E. Davidson, RES
W. Morrison, SD

DOE

P. Davis

EPRI

R. Leyse

WESTINGHOUSE

J. Gallagher

ALDERSON REPORTERS

P. Minson
S. Clinkson