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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

JUL 19 1989

MEMORANDUM FOR: William T. Russell
Regional Administrator, Region I

Stewart D. Ebnetter
Regional Administrator, Region II

A. Bert Davis
Regional Administrator, Region III

Robert D. Martin
Regional Administrator, Region IV

John B. Martin
Regional Administrator, Region V

FROM: Thomas E. Murley, Director
Office of Nuclear Reactor Regulation

SUBJECT: GUIDANCE ON ACTION TO BE TAKEN FOLLOWING DISCOVERY
OF POTENTIALLY NONCONFORMING EQUIPMENT

As a result of the EDO Senior Management Meeting on June 28-29, 1988, NRR was asked to develop guidance concerning the length of time a licensee should be allowed to decide the question of operability when an equipment deficiency is discovered. After careful consideration, NRR has concluded that it is unnecessary to issue such guidance. There is no generally appropriate timeframe in which operability determinations should be made.

Equipment which is clearly inoperable (such as a valve that will not open or pump that will not run) should immediately be declared inoperable and the appropriate technical specification followed if the equipment is included in the technical specifications. Nonconformances which call into question the capability of a system or component to perform its specified functions include (but are not limited to) situations where licensees do not meet a Final Safety Analysis Report commitment or a code or standard to which they have committed. Even though such nonconformances may not be accompanied by physical evidence of degradation, a question is raised regarding the operability of the equipment, i.e., the capability of the equipment to perform its specified function. In these cases, operability determinations should be made by licensees as soon as practicable, and in a timeframe commensurate with the applicable equipment's importance to safety, using the best information available (e.g., analyses, a test or partial test, experience with operating events, engineering judgment

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or a combination of these factors). We believe that this is the current practice, and issuance of prescriptive guidance in this area could impose an unnecessary burden on licensees with no improvement in safety.

Specific questions on operability can, where necessary, be discussed with NRR personnel by contacting the appropriate Projects Division.

Original signed by
Thomas E. Murley

Thomas E. Murley, Director
Office of Nuclear Reactor Regulation

cc: V. Stello, EDO
J. M. Taylor, EDO