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Criteria For Deleting Non-Safety Basis Licensing Committments And USAR Information

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Licensing Topic Report

CRITERIA FOR DELETING NON-SAFETY BASIS LICENSING COMMITMENTS AND USAR INFORMATION

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ABSTRACT

This report presents a four tier approach with associated criteria for (1) deleting/changing non-safety basis utility licensing commitments and (2) deleting non-safety basis information from the Updated Safety Analysis Report (USAR). These deletions/changes will eliminate unnecessary (non-safety) NRC and utility licensing effort and information, and create a safety basis USAR. It is intended that these criteria be incorporated into Cost Beneficial Licensing Actions (CBLA) programs (e.g., a Commitment Change Process and a USAR Reduction Program) to reduce NRC and utility licensing costs when complying with 10CFR50.59 (Reference 1) and satisfying numerous licensing commitments. As part of a CBLA program the deletions would reduce (1) the number of outstanding licensing commitments (2) the number of unnecessary 10CFR50.59 safety evaluations, (3) the size of future USAR updates, (4) the number of unnecessary utility (e.g., PORC) safety reviews, (5) the amount of information reported to the NRC as required by 10CFR50.59 and the licensing commitments, and (6) the NRC resources needed to review licensing commitments and process USAR updates.

1.0 INTRODUCTION & SCOPE

The Updated Safety Analysis Report (USAR) scope can be reduced by eliminating non-safety information and engineering items that, if changed, would not involve an Unreviewed Safety Question (USQ) as defined in 10CFR50.59. The revised (reduced) USAR would be confined to the licensed safety basis for the plant. The excluded items would include information no longer required in a SAR per NUREG-0800, information duplicated in other locations in the USAR, information only needed for the initial licensing of the plant, and confirmatory information and non-safety analysis methodology and results.

A USAR reduction program (to produce a safety basis USAR) would streamline the USAR to the essential design criteria, testing criteria, operating sequences, procedures, licensing acceptance criteria, and safety analyses upon which the actual plant safety and many plant Technical Specifications are based.

The number and/or content of licensing commitments can be reduced by identifying and deleting those commitment or portions of commitments which are not part of the plant's licensed safety basis. The resulting (smaller) group of commitments (requiring disposition) will allow resources to be prudently directed to commitments that improve or maintain plant safety.

This report provides a graded four tier (level) approach for deletion of non-safety or non-safety significant licensing commitments and USAR information. (A typical commitment and USAR reduction process is shown in Figure 1-1.) The first tier uses general (simplified) bounding criteria to justify deleting items. The second tier uses more specific criteria to justify deleting non-safety items that can not be deleted through the use of the bounding criteria. The third tier uses USQ determinations, using the plant's 10CFR50.59 program, to justify deleting items. The fourth tier uses the license amendment process to obtain NRC approval for deleting an USAR item or licensing commitment. Because the 10CFR50.59 criteria and the license amendment process are in the regulations, this report does not review the 10CFR50.59 criteria and license amendment process, or go into the details of implementing the third and fourth tiers.

Criteria for the first two tiers are provided in Sections 3 and 4. They determine which licensing commitments may be deleted/changed, and what non-safety information should be deleted from the USAR. The first tier uses simple (general) bounding criteria, and commitments/USAR items that meets the bounding criteria may be deleted with no further review. The second tier uses specific deletion criteria, and requires detailed utility reviews to determine which specific

commitments and USAR items may be changed/deleted. All licensing commitments, and USAR text, tables and figures are subject for review, but only those items that meet the bounding or specific deletion criteria may be change or removed. Items meeting the bounding or specific deletion criteria can be changed/deleted without involving an USQ, and thus, may be modified or removed without performing a detailed 10CFR50.59 USQ evaluation.

The Nuclear Energy Institute (NEI) has developed a commitment change process, which uses probabilistic risk/safety assessment techniques to determine if changing a commitment is "significant to safety." Per the NEI guidance, commitments that are not significant to safety may be changed without prior NRC approval, but with some specified levels of NRC notification. As shown in Figure 1-1, using the bounding and specific deletion criteria herein provides a deterministic method for demonstrating that a proposed commitment change/deletion is not significant to safety. Therefore, the bounding and specific deletion criteria may be used to augment a NEI type commitment change process/program. A typical process that uses both deterministic and risk based techniques is shown in Figure 1-2.

1.1 Other Uses

As an alternate approach from deleting items from the USAR, the bounding and specific deletion criteria can be used in bounding evaluations that would justify exempting future changes to specifically identified structures, systems and components (SSCs) from the requirement to perform 10CFR50.59 USQ evaluations. However, all other USAR update requirements from 10CFR50.71(e) would still apply to the exempted items.

Some older plants have small USARs that do not completely describe the plants' licensed safety bases. To incorporate the safety basis of an older plant into a single document, an utility may wish to update a plant USAR beyond the requirements of 10CFR50.71(e). To help make this enhancement, the bounding and specific deletion criteria can be used to determine what information should be added to the USAR.

1.2 Background

Over the years, utilities have accumulated extensive lists of licensing commitments that have been made to the NRC. Some of these commitments involve the implementation and/or reporting of testing, operations, analyses, changes and descriptions of nonsafety-related structures, systems and components (SSCs), which are not specifically required by regulation. Compliance with these commitments or their modification uses NRC and utility resources without enhancing or

maintaining (ensuring) plant safety. A process that eliminates the need to comply with or modify non-safety commitments (which could not realistically affect safety) would allow for better utilization of valuable NRC and industry resources.

The USARs for most plants contain information on nonsafety-related SSCs and analyses. In particular, Regulatory Guide 1.70 based USARs contain large amounts of (1) detailed nonsafety-related information and engineering analyses, (2) information no longer required in a SAR per NUREG-0800, (3) information redundantly located in other portions of the USAR, (4) information also supplied to the NRC under a separate/redundant program or reporting requirement, (5) information only needed for the initial licensing of the plant, and (5) confirmatory information and engineering analyses (non-safety analysis) results. For example, some SARs contain detailed Piping and Instrumentation Diagrams (P&IDs) of nonsafety-related systems. Based on Section D.7.a of the NRC IE Manual on 10CFR 50.59 (Reference 2), any SAR P&ID change (regardless of all other conditions) requires a detailed written USQ (10CFR50.59) safety evaluation. Therefore, utilities perform numerous detailed written USQ safety evaluations for all USAR P&ID or other changes, which, per the plant's licensed safety basis, could not realistically generate an USQ.

In addition to performing the USQ safety evaluations, utilities must use resources to perform internal (e.g., PORC) reviews (as required by the Technical Specifications), update plant USARs, annually prepare and send the NRC summary reports of all USQ safety evaluations on changes that do not involve an USQ. The NRC must then apply resources to review numerous minor nonsafety-related changes.

Because most of the changes at a plant are to the nonsafety-related portions of plant, the majority of these changes do not affect safety. A process that eliminates the need to perform detailed USQ safety evaluations on nonsafety-related changes (which could not realistically generate an USQ) would allow for better utilization of valuable industry and NRC resources. Therefore, a safety basis USAR would be cost beneficial with no effect on safety. In addition, with much of the non-safety information deleted from the USAR, the USAR would be simpler and thus easier for utility personnel to understand and maintain a plant's licensed safety basis.

1.3 Bounding Deletion Criteria - First Tier

Bounding evaluations, where items meet all of the bounding deletion criteria, would justify generically deleting/changing broad categories of (1) licensing commitments, and (2) plant SSCs from the USAR and subsequent future detailed USQ safety evaluations. The deletions/changes

would be based on demonstrating that the commitments/SSCs cannot impact the safety of operations or plant design. These items are those that:

A. (Proprietary information contained in NEDC-32343P);

B. (Proprietary information contained in NEDC-32343P);

C. (Proprietary information contained in NEDC-32343P);

D. (Proprietary information contained in NEDC-32343P);

E. (Proprietary information contained in NEDC-32343P);

F. (Proprietary information contained in NEDC-32343P);

G. (Proprietary information contained in NEDC-32343P); and

H. (Proprietary information contained in NEDC-32343P).

1.4 Specific Deletion Criteria - Second Tier

Evaluations based on the (more detailed) specific deletion criteria, justify changing/deleting specific licensing commitments, and deleting specific items from the USAR and thus subsequent future detailed USQ safety evaluations. The changes/deletions would be based on demonstrating that the items are not part of the plant's safety basis. These items are those that meet all of the criteria shown in Section 4.1. The following are examples of items that categorically meet all the specific deletion criteria.

A. Items not required in a SAR per the current revision of the applicable SRP in NUREG-0800;

B. Items that involve equipment that is (physically and/or electrically) isolated from any safety-related SSC during all abnormal events evaluated in the USAR;

C. Items that involve/present/describe confirmatory (non-safety) engineering analyses;

D. Items only required to initially obtain the plant operating license (OL), are not subject to change after OL issuance, or do not maintain/describe a safety basis of the plant after OL issuance;

E. Items that do not help ensure/describe a safety-related, safe shutdown, fire protection, post accident sampling/monitoring, radiation protection/monitoring, anticipated operational occurrence mitigation or special event (e.g., ATWS) prevention or mitigation function;

F. Items that involve/describe monitored variables that are not part of the envelope (set) of plant conditions assumed prior to the initiating event in any abnormal event analysis or monitored after an abnormal event is initiated; and/or

G. Items also committed/provided to the NRC (1) under separate cover letters, (2) under separate programs, or (3) other locations in the USAR, and thus the commitment or information in the USAR is redundant.

1.5 Licensing Basis

Current practices often divert NRC and utility resources to non-safety items, and potentially could have a negative effect on the plant's overall USQ safety evaluation process. (A safety basis USAR would provide a clearer understanding of the plant safety, and thus, potentially could improve the quality of a plant's 10CFR50.59 process.) The 10CFR50.59 guidance in Reference 2 supplies a general criterion that can be used to eliminate these concerns. This general criterion is the licensing basis used to develop the criteria for justifying the deletion/change of licensing commitments and items from the USAR. Reference 2 Section D.7.d states "the intent of 10CFR50.59 is to limit the requirement for written safety evaluations to facility changes, tests and experiments which could impact the safety of operation." Sections 3 and 4 provide the criteria for evaluating a licensing commitment or an item in the USAR, to demonstrate that compliance with the commitment, or that any modification(s) of those items cannot impact the safety of operations, and thus, these items can be changed or deleted from the commitment list or USAR without affecting the plant's licensed safety basis.

The deletion of licensing commitments and information from the USAR would reduce a plant's Current Licensing Basis (CLB). However, using the process described herein would preserve the plant's safety basis. Therefore, the deletions would not affect plant safety.

The intent of the FSAR update rule in 10CFR50.71(e) is to ensure that a plant's licensed safety basis (at least to the extent contained in the original FSAR) is maintained. The deletion of non-safety information does not affect that intent. Because the specific deletion criteria bound a plant's safety basis, the criteria (as described in Section 1.1) can be used to enhance a USAR beyond the requirements of 10CFR50.71(e).

If the NRC or GE determines that changes or additions to the criteria presented within this document are needed, GE will submit a proposed revision of this document to the NRC for approval.

1.6 Evaluation Scope

This evaluation addresses a number of subjects that provide the justification for deleting non-safety commitments and information from the USAR. The subjects addressed by this report are:

A. definitions of terms;

B. bounding criteria for changing/deleting commitments or USAR items;

C. criteria for changing/deleting specific commitments or USAR items; and

D. a prototypical checklists for evaluating commitment and USAR changes/deletions.

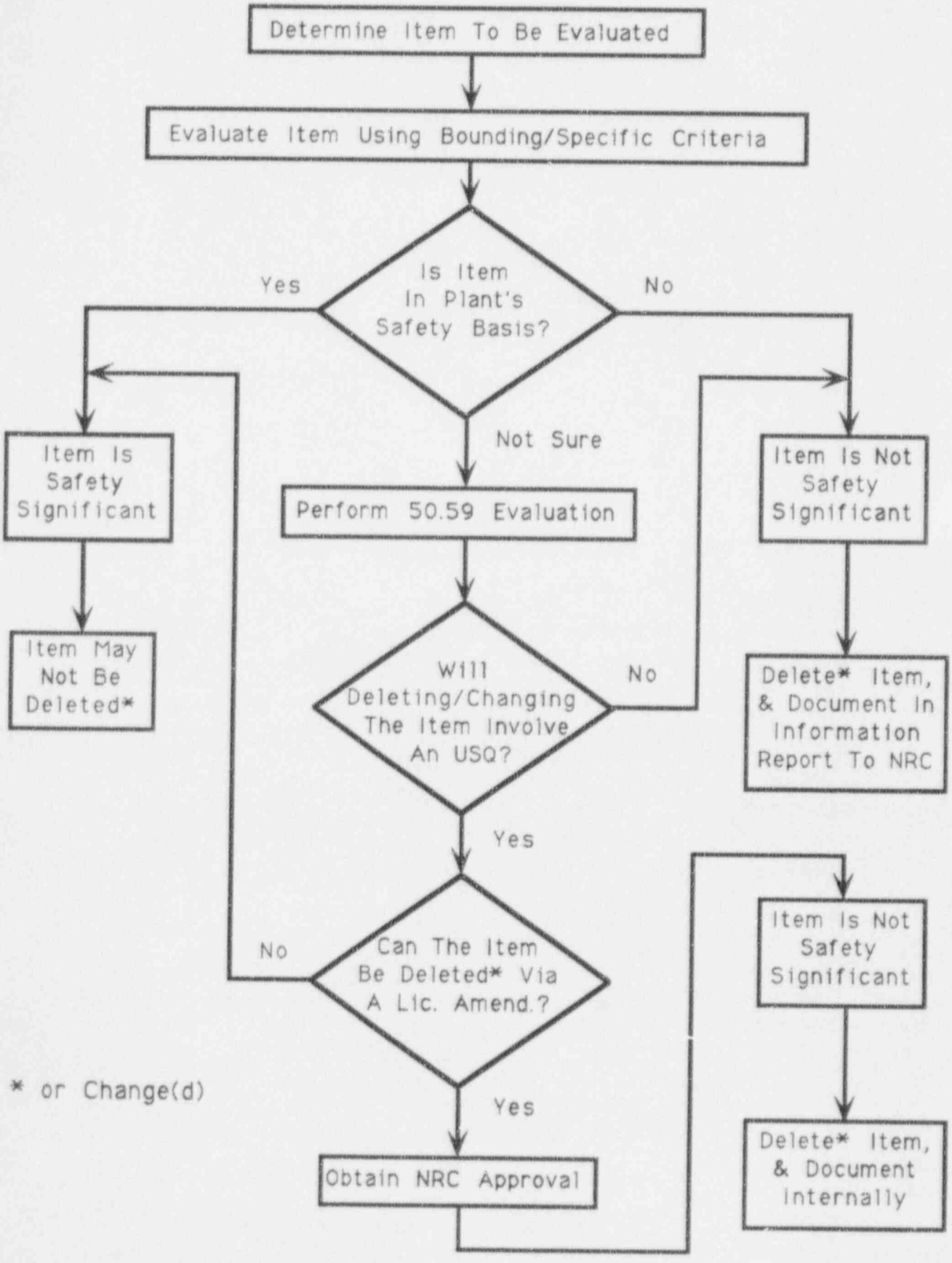


Figure 1-1. TYPICAL COMMITMENT & USAR REDUCTION PROCESS

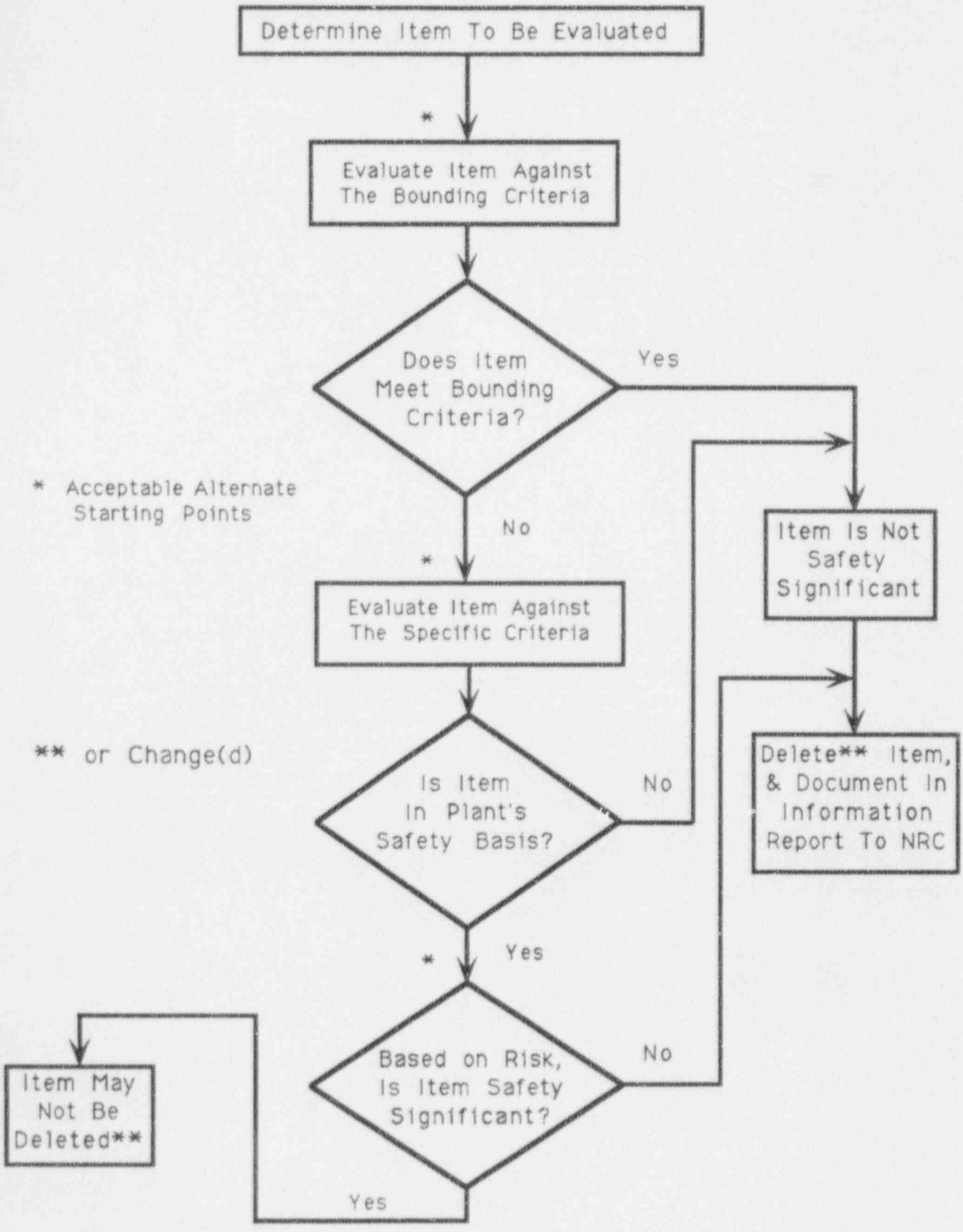


Figure 1-2. TYPICAL COMMITMENT PROCESS USING DETERMINISTIC & RISK BASED TECHNIQUES

2.0 DEFINITIONS

2.1 Important To Safety & Safety-Related

A clear set of criteria for determining if an item is important to safety is not provided in the 10CFR's, and thus, a complete definition of the term "important to safety" does not exist in regulation. For purposes of 10CFR50.59, equipment that is important to safety is equipment which has been identified in the plant licensing documents as important to safety. For most plants, this is the equipment which is classified as safety-related. The NRC has stated that the definition of equipment that is nonsafety-related but is important to safety is a generic issue to be resolved by rulemaking (Reference 3). Under 10CFR50.59, changes in nonsafety-related equipment are considered inherently in the evaluation of changes that could increase the probability of an accident/malfunction or that could create a new type of accident/malfunction. Because safety-related criteria are provided in the 10CFR's and for the practical application of criteria, only the term "safety-related" will be used herein.

A safety-related function is any primary or support function that is necessary to ensure:

A. the integrity of the reactor coolant pressure boundary,

B. the capability to shut down the reactor and maintain it in a safe shutdown condition, or

C. the capability to prevent or mitigate the consequences of accidents that could result in potential offsite exposures that are comparable to the guideline exposures of 10CFR 100.

Also, an item is safety-related if it applies to:

A. Structures, systems or components that perform safety-related functions,

B. Essential drawings, specifications, procedures, analyses or documents used to determine or describe parameters affecting structures, systems or components that are designed to perform safety-related functions, or

C. Essential services to design, purchase, fabricate, handle, ship, store, clean, erect, install, test, operate, maintain, repair, refuel or modify structures, systems or components that are designed to perform safety-related functions.

If a change affects a normally nonsafety-related item, whose operation or failure could cause the failure of a safety-related function to be performed, the change will need to be considered as safety-related, as associated (per Regulatory Guide 1.75), or need special requirements.

Typically, components are classified as "Q" for safety-related, "N" for nonsafety-related, and "S" for special. A component classified as "S" does not perform/ensure a safety-related function but usually needs to meet some additional requirement(s). For example, a nonsafety-related S electrical component which is used to mitigate a special (beyond design basis) event may be purchased to Class IE requirements.

2.2 Licensing Commitment

For the purposes of this report, a licensing commitment is (1) any action/condition, stated in writing (submitted on the plant's docket) to the NRC (e.g., letter or SAR), that a licensee has said would be performed/maintained, or (2) any action/condition (stated in writing by the NRC) that a licensee shall perform/maintain.

2.3 Plant Event Categories

Plant events are divided into two categories, which are (1) design basis events and (2) special events. Per 10CFR50.49, design basis events are defined as conditions of normal operation, including anticipated operational occurrences, design basis accidents, external events, and natural phenomena for which the plant must be designed to ensure the safety-related functions. Per Regulatory Guide 1.70, anticipated operational occurrences are divided into two classifications, incidents of moderate frequency and infrequent incidents. A moderate frequency incident is an abnormal event which may occur during a calendar year for a particular plant. An infrequent incident is an abnormal event which may occur during the lifetime of a particular plant. Regulatory Guide 1.70 classifies accidents as limiting faults, which are occurrences that are not expected to occur but are postulated because their consequences would include the potential for the release of significant amounts of radioactive material.

Special events are additional postulated events to demonstrate some special capability of the plant in accordance with regulatory requirements. Special events usually involve postulated common

cause failures, and are not treated like design basis events. Special events usually require special prevention and/or mitigation capabilities, are usually addressed in the SAR, but do not usually require a safety analysis in the SAR. Figure 2-1 provides a pictorial representation.

2.4 Safety Analysis

A plant safety analysis demonstrates compliance to regulatory criteria with respect to evaluating the plant's capability (1) to maintain fission product barriers (e.g., fuel cladding, reactor coolant pressure boundary (RCPB), primary containment), (2) to mitigate the radiological consequences of fission product barrier failures, and (3) to achieve and maintain safe shutdown. Table 2-1 lists the safety analyses in a typical SAR, based on Regulatory Guide 1.70 format.

2.5 Unreviewed Safety Question (USQ)

10CFR50.59 (Reference 1) states "a proposed change, test or experiment shall be deemed to involve an unreviewed safety question

(i) if the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the safety analysis report may be increased; or

(ii) if a possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report may be created; or

(iii) if the margin of safety as defined in the basis for any technical specification is reduced."

2.6 Updated Safety Analysis Report (USAR)

From 10CFR50.71(e), "This submittal shall contain all the changes necessary to reflect information and analyses submitted to the Commission by the licensee or prepared by the licensee pursuant to Commission requirement since the submission of the ... last updated FSAR. The updated FSAR shall be revised to include the effects of: all changes made in the facility or procedures as described in the FSAR; all safety evaluations performed by the licensee either in support of requested license amendments or in support of conclusions that changes did not involve an unreviewed safety question; and all analyses of new safety issues performed by or on behalf

of the licensee at Commission request. ...The submittal shall include...(ii) an identification of changes made under provisions of 50.59 but not previously submitted to the Commission."

Per Reference 4, the "drawing package", often supplied with a FSAR, and which may be listed in Chapter 1 of the FSAR, "is not considered part of the FSAR." These drawings do not require updating per 10CFR50.71(e). Therefore, the "drawing package" and other information supplied outside the FSAR, that are not required to be updated per 10CFR50.71(e), are not part of the USAR.

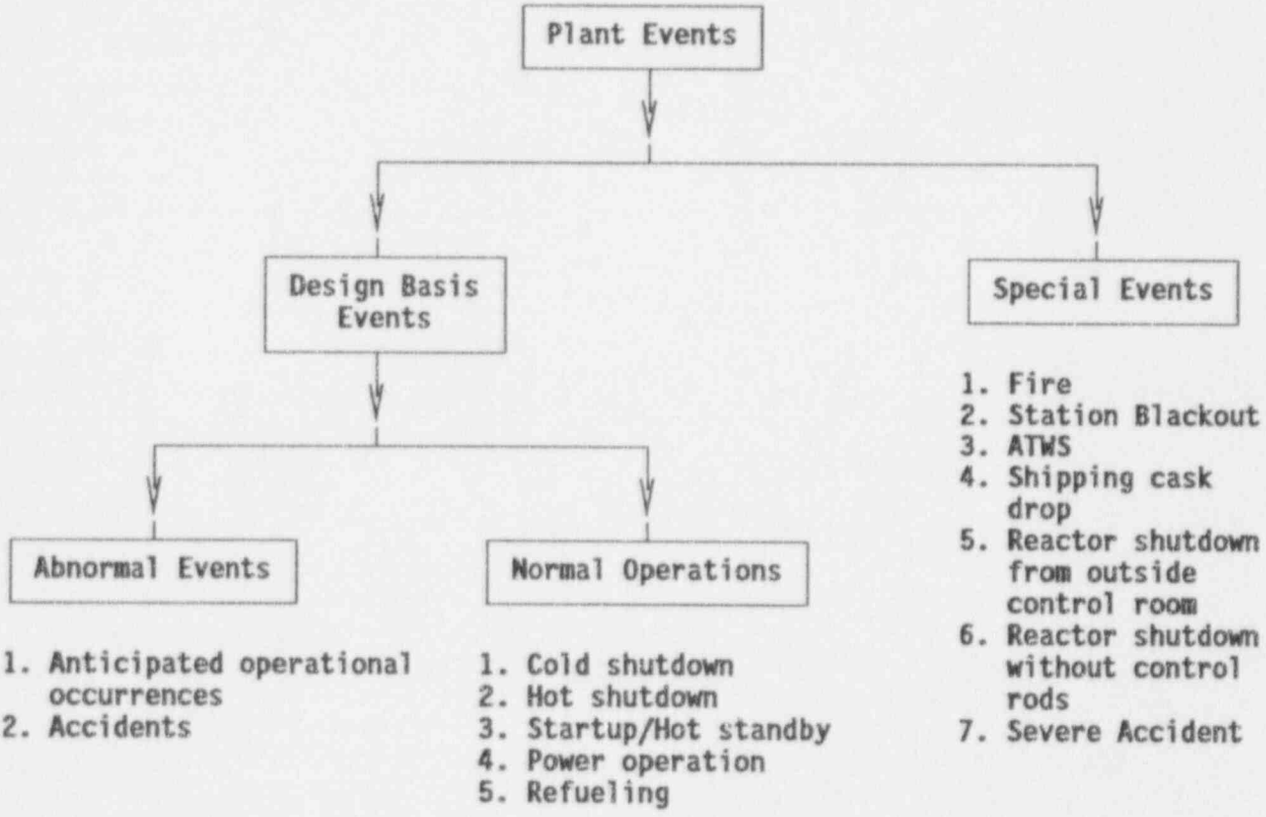
Table 2-1

Plant Safety Analyses

Safety Analysis Name/Category	R.G. 1.70 SAR Chapter/Section	Primary Safety Concern
Reactor shutdown margin	4.3	Achieve and maintain safe shutdown
MCPR/DNBR safety limit	4	Maintain local fuel clad integrity
RCPB overpressure protection	5.2	Maintain RCPB integrity
Containment	6.2	Maintain primary containment integrity
ECCS-LOCA	6.3	Maintain gross (core wide) fuel clad integrity
New & spent fuel criticality	9.1	Prevent criticality
Anticipated Operational Occurrences	15	Maintain local fuel clad integrity
Alternate shutdown cooling	15	Maintain safe shutdown
Accidents	15	Mitigate the radiological consequences of fission product barrier failures

Figure 2-1

Plant Event Categories*



* The analysis of external events and natural phenomena usually do not change, and thus, are not shown.

3.0 BOUNDING DELETION CRITERIA

This section provides the (first tier) bounding criteria for generically deleting/changing a broad category of licensing commitments, and deleting a broad category of structures, systems and components (SSC) from the USAR. If a commitment is adequately addressed in another commitment, the redundant commitment may be deleted. In addition, if an item described in the USAR is adequately described in another USAR location, the item's description can be replaced with a reference to the other USAR location.

The results of the evaluations of items which meet bounding deletion criteria, and the deletion of redundant commitments and USAR descriptions can be documented in a separate information report. This report can be provided as part of a plant specific USAR update to the NRC.

The USAR items covered in the above reports are only exempt from subsequent USQ safety evaluations. All other engineering practices, reviews and evaluations still apply.

Because the bounding evaluations only pertain to nonsafety-related structure, systems and components outside the primary containment, they cannot increase the probability or consequences of any design basis event in the USAR accident analysis chapter (Chapter 15 in Regulatory Guide 1.70). Mitigating the consequence (radiation dose) of a design basis accident is a safety-related function. Therefore, the consequences of design basis accidents need not be specifically evaluated. However, the consequences of other (non-design basis) accidents (i.e., failures of components containing radioactive material) are covered by Criterion E, below.

3.1 Criteria

For an item to be deleted/changed, it must be adequately addressed/described in another commitment/USAR location, or meet all of the following bounding criteria.

A. (Proprietary information contained in NEDC-32343P),

B. (Proprietary information contained in NEDC-32343P),

C. (Proprietary information contained in NEDC-32343P),

D. (Proprietary information contained in NEDC-32343P),

E. (Proprietary information contained in NEDC-32343P),

F. (Proprietary information contained in NEDC-32343P),

G. (Proprietary information contained in NEDC-32343P), and

H. (Proprietary information contained in NEDC-32343P).

The prototype checklist for reviewing a commitment, structure, system or component, against the above criteria, is shown on Table 3-1.

An example of an item that can be generically deleted and an example of a item that can not be generically deleted follow. The floor drain lines in the turbine building perform no active or passive function in any safety analysis, and thus, should be deleted from the USAR. Credit is taken for the use of the turbine bypass line in a transient analysis, and thus, the description of the turbine bypass function should not be deleted from the USAR.

Table 3-1

BOUNDING DELETION EVALUATION CHECKLIST

REV.____

SUBJECT: _____

_____

DISCUSSION: _____

Table 3-1 (continued)

BOUNDING DELETION EVALUATION CHECKLIST

REV.____

SUBJECT:_____

_____

A. Is the subject item adequately addressed/described in another commitment/USAR location?
YES ___ NO ___ (If the answer is "YES", go to Part C, otherwise continue.)

B. Bounding Deletion Evaluation Questions:

Does the commitment or SSC being reviewed:	YES	NO
1. (Proprietary information contained in NEDC-32343P)	____	____
2. (Proprietary information contained in NEDC-32343P)	____	____
3. (Proprietary information contained in NEDC-32343P)	____	____
4. (Proprietary information contained in NEDC-32343P)	____	____
5a. (Proprietary information contained in NEDC-32343P)	____	____
5b. (Proprietary information contained in NEDC-32343P)	____	____
5c. (Proprietary information contained in NEDC-32343P)	____	____
6. (Proprietary information contained in NEDC-32343P)	____	____
7. (Proprietary information contained in NEDC-32343P)	____	____
8. (Proprietary information contained in NEDC-32343P)	____	____

Table 3-1 (continued)

BOUNDING DELETION EVALUATION CHECKLIST

REV.____

SUBJECT:_____

_____

C. Conclusion:

	YES	NO
The subject commitment/USAR item (1) is a redundant description or commitment, (2) can be deleted without affecting plant safety, or (3) can be changed and generically not involve an USQ, and thus, the subject item may be changed or deleted from the licensing commitment list or USAR? ("YES", if (1) the response to Question A is "YES", or (2) the responses to Questions B.1-4 and 6-7 are "NO", and B.5c is "NO" or "N/A".)	____	____

D. Reference(s): (as needed)

_____

_____

_____

_____

_____

_____

_____

Prepared By*: _____ Date: _____

Title: _____

Reviewed By*: _____ Date: _____

Title: _____

Approved By*: _____ Date: _____

Title: _____

*Print or type and sign

4.0 SPECIFIC DELETION CRITERIA

This section provides the detailed (second tier) criteria for deleting/changing specific licensing commitments and information from the USAR. Items meeting the bounding deletion criteria in Section 3 do not need to be evaluated using the criteria in this section. The results of the evaluations of items which meet all of the specific deletion criteria can be provided in a separate information report along with a plant specific USAR update to the NRC.

The USAR items covered in the above reports are only exempt from subsequent USQ safety evaluations. All other (remaining applicable) engineering, QA/QC, reviews and evaluations still apply.

4.1 Criteria

This section provides the specific criteria for justifying the deletion of or change to licensing commitments and/or items from the USAR. To qualify for deletion/change, a subject commitment, SSC, analysis, description, procedure, test or experiment (item) shall meet all of the criteria listed below. Examples of items that categorically meet the deletion criteria are shown in Section 4.2.

A. (Proprietary information contained in NEDC-32343P)

B. (Proprietary information contained in NEDC-32343P)

C. (Proprietary information contained in NEDC-32343P)

D. (Proprietary information contained in NEDC-32343P)

E. (Proprietary information contained in NEDC-32343P)

F. (Proprietary information contained in NEDC-32343P)

G. (Proprietary information contained in NEDC-32343P)

H. (Proprietary information contained in NEDC-32343P)

I. (Proprietary information contained in NEDC-32343P)

J. (Proprietary information contained in NEDC-32343P)

K. (Proprietary information contained in NEDC-32343P)

L. (Proprietary information contained in NEDC-32343P)

M. (Proprietary information contained in NEDC-32343P)

N. (Proprietary information contained in NEDC-32343P)

O. (Proprietary information contained in NEDC-32343P)

A prototype checklist for reviewing a commitment, structure, system or component, against the above criteria, is shown on Table 4-1.

4.2 Examples

Licensing commitments and USAR text, table or figure items meeting the Section 4.1 criteria may be changed/deleted from the plant licensing commitment list or USAR without affecting safety. The change/deletion of those items will not affect maintaining or describing the plant safety basis. The following provides examples of categories of items that meet the specific deletion criteria, and a short justification for each category.

A. Items not required in a SAR per the current revision of the applicable SRP in NUREG-0800.

Justification: A subject that is not addressed in the applicable SRP either never should have been included in the commitment list or SAR, or the NRC has generically concluded that the subject is no longer needed in the SAR (i.e., the analyses in SRPs 15.7.1 and 15.7.2).

B. Items involving equipment that is isolated from any (beyond the interface/isolation between safety-related and nonsafety-related SSCs) safety-related SSC during all abnormal events evaluated in the USAR.

Justification: Based on the single failure criteria, an isolated nonsafety-related item can not either prevent the occurrence or mitigate the consequences of

any accident or malfunction in the USAR. Therefore, this information is not part of the plant's safety basis, and no commitment or USAR description should be required.

C. Item involving/presenting/describing confirmatory (non-safety) engineering analyses.

Justification: These analyses and their results must already exist in 10CFR50 App. B quality engineering record files and/or reports (which can be audited by the NRC), before they can be incorporated into the USAR or sent to the NRC. USAR incorporations of this information can lead to editorial errors, increase the difficultly and cost of maintaining a valid USAR, document information already covered by another regulation, and does not enhance plant safety. As long as the design and regulatory criteria (from which the NRC acceptance is based) is still met, this commitment/information may be changed without involving an USQ per 10CFR50.59. The plant nuclear safety analyses are only based on the item meeting its NRC approved design and regulatory criteria. Therefore deleting non-safety confirmatory engineering analyses does not affect the plant safety basis as described in the USAR.

D. Items only required to initially obtain the plant operating license (OL), are not subject to change after OL issuance, or do not maintain/describe a plant safety basis after OL issuance.

Justification: Some items within this category are initial (one-time) pre-operation and startup tests (that are not repeated after the plant obtains its OL), comparisons with other plants, site or surrounding area characteristics (that are not subject to change), and other information that can be adequately addressed by referencing to the original FSAR (FSAR at the time of OL issuance). This type of information only makes the USAR larger and more cumbersome without enhancing plant safety. Any plant modification which requires extensive testing will have its test program reviewed as part of the modification's approval process.

E. Items (e.g., system process data, test or non-safety modes of operation) do not help ensure/describe a safety-related, safe shutdown, fire protection, post accident sampling/monitoring, radiation protection/monitoring, anticipated operational occurrence mitigation or special event prevention/mitigation function.

Justification: These types of items were supplied for completeness to facilitate NRC understanding rather than identification of safety features, are not part of the plant's safety basis, and thus, can be changed or deleted without affecting safety.

F. Items involving/describing a monitored variable that is not part of the envelope (set) of plant conditions assumed prior to the initiating event in any abnormal event analysis or monitored after an abnormal event is initiated.

Justification: These monitored variables are not used to ensure the validity of the safety analyses, and they are not used by the operators in assessing/mitigating any abnormal event. Therefore, this commitment/information is not part of the plant's safety basis, and can be deleted.

G. Items also committed/provided to the NRC (1) under separate cover letters, (2) under separate programs, or (3) other locations in the USAR, and thus the commitment or information in the USAR is redundant.

Justification: Certain items (e.g., emergency plans and QA programs) are provided to the NRC outside of the USAR update program, or redundant commitments may exist. These commitments or information are already within the plant's licensing basis, and the commitment list or USAR needs to only refer to these other programs/submittals for completeness.

Table 4-1

SPECIFIC DELETION EVALUATION CHECKLIST

REV.____

SUBJECT: _____

_____

DISCUSSION: _____

Table 4-1 (continued)

SPECIFIC DELETION EVALUATION CHECKLIST

REV.____

SUBJECT:_____

_____

A. (Proprietary information contained in NEDC-32343P) YES: ___ NO: ___ (If the answer is "YES", go to Part C, otherwise continue.)

B. Deletion Evaluation Questions:

Is/does the commitment/USAR item being reviewed:	YES	NO
1. (Proprietary information contained in NEDC-32343P)	____	____
2. (Proprietary information contained in NEDC-32343P)	____	____
3. (Proprietary information contained in NEDC-32343P)	____	____
4. (Proprietary information contained in NEDC-32343P)	____	____
5. (Proprietary information contained in NEDC-32343P)	____	____
6. (Proprietary information contained in NEDC-32343P)	____	____
7. (Proprietary information contained in NEDC-32343P)	____	____

Table 4-1 (continued)

SPECIFIC DELETION EVALUATION CHECKLIST

REV.____

SUBJECT: _____

_____

B. Deletion Evaluation Questions: (continued)

Is/does the commitment/USAR item being reviewed:	YES	NO
8. (Proprietary information contained in NEDC-32343P)	____	____
9. (Proprietary information contained in NEDC-32343P)	____	____
10. (Proprietary information contained in NEDC-32343P)	____	____
11. (Proprietary information contained in NEDC-32343P)	____	____
12. (Proprietary information contained in NEDC-32343P)	____	____
13. (Proprietary information contained in NEDC-32343P)	____	____
14. (Proprietary information contained in NEDC-32343P)	____	____
15. (Proprietary information contained in NEDC-32343P)	____	____

Table 4-1 (continued)

SPECIFIC DELETION EVALUATION CHECKLIST

REV.____

SUBJECT:_____

_____

C. Conclusion:

	YES	NO
Can the subject item be changed or deleted from the commitment list or USAR without affecting the safety basis or losing any safety basis information? ("YES", if the response to Question A is "YES" or all the responses to Questions B.1-15 are "NO".)	____	____

D. Reference(s): (as needed)

_____

_____

_____

_____

_____

_____

_____

Prepared By*: _____ Date: _____

Title: _____

Reviewed By*: _____ Date: _____

Title: _____

Approved By*: _____ Date: _____

Title: _____

*Print or type and sign

5.0 REFERENCES

1. 10CFR 50.59, Changes, Tests and Experiments.

2. U.S.N.R.C. Inspection and Enforcement Manual, "10CFR 50.59" "Part 9800 CFR Discussions" "Changes to Facilities, Procedures and Tests (or Experiments)", January 1, 1984.

3. Nuclear Regulatory Commission Memorandum and Order No. CLI-84-9, June 6, 1984.

4. Letter to All Operating Reactor Licensees, from Darrell G. Eisenhut, Director Division of Licensing, "Periodic Updating of Final Safety Analysis Reports (FSARs)," December 15, 1980.

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