

Risk-Informed Technical Specifications

- **Exactly what and how are we risk-informing?**
 - **Is there enough benefit to pursue rulemaking?**
 - **Can the requirements of the maintenance rule be substituted for the current system of actions with fixed allowed outage times?**
 - **How much operational control is the NRC ready to transfer to licensees?**
 - **How can the safety benefits be communicated to stakeholders?**
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Risk-Informed Technical Specifications

- **RITSTF seven initial initiatives**
 1. **Define Hot Shutdown as preferred end state for TS actions**
 2. **Increase time allowed to delay entering actions when surveillance is missed**
 3. **Modify existing mode restraint logic to allow entry into higher mode LCOs with inoperable equipment based on low risk**

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- **RITSTF seven initial initiatives**
 4. **Replace current system of AOTs with configuration risk management program**
 5. **Optimize surveillance requirements**
 6. **Modify LCO 3.0.3 to allow 24 hours to perform risk-informed evaluation to determine prudent course of action**
 7. **Define actions when equipment is not operable but is still functional**

Risk-Informed Technical Specifications

- **Transfer control to licensees**
 - **Missed surveillances:**
 - ▶ **Determination of first reasonable opportunity to perform surveillance is under licensee control and includes consideration of risk impacts**
 - **Changing modes with inoperable equipment:**
 - ▶ **Allow entry into a Mode with TS equipment inoperable if management review & obtained (includes consideration of risk)**
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Risk-Informed Technical Specifications

- **Transfer control to licensees**
 - **Allowed outage times (AOTs)**
 - AOTs would be dependent on information from risk management program with a “not to exceed” time limit
 - **Immediate shutdown requirements (LCO 3.0.3):**
 - Allow 24 hours to determine prudent course of action - i.e., shutdown or continue to operate with degraded condition
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Maintenance Rule

10 CFR 50.65 (a) (4)

- **Before performing maintenance activities (including but not limited to surveillance, post-maintenance testing, and corrective and preventive maintenance), the licensee shall assess and manage the increase in risk that may result from the proposed maintenance activities. The scope of the assessment may be limited to those structures, systems, and components that a risk-informed evaluation process has shown to be significant to public health and safety.**
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