

**RIC 2001  
50.59/Maintenance Rule  
Implementation and Status  
Session W15**

**50.59/Maintenance Rule  
Interface**

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# Background

- 50.59 reviews have included temporary modifications or alterations since 1989
- 50.65(a)(4) requires configuration risk assessment and management of maintenance activities
- Issue raised in guidance development to avoid duplicative reviews

# The Guidance

- Treat activities associated with maintenance under 50.65(a)(4)
- Treat compensatory measures that address degraded conditions under 50.59
- If temporary alteration associated with maintenance exists at power for >90 days, perform 50.59 review



# Scoping differences between 50.59 and (a)(4)

- 50.59 - is the activity a change to the facility described in the UFSAR?
- (a)(4) - does maintenance activity affect risk-significant SSCs?
- Q: What if maintenance activity is not within the scope of (a)(4)?
- A: Then neither (a)(4) or 50.59 apply



# Rationale

- Maintenance is not a “change” under 50.59
  - Consistent position since NSAC-125
- Many maintenance activities may “screen out” of (a)(4) assessment
  - Same philosophy used in 50.59
- Tech spec operability unaffected by (a)(4) assessment

