

RIC 2003

RISK-INFORMED ACTIVITIES, Session T3

**Coherence and Risk Management
Technical Specifications**

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Technical Specifications/ Maintenance Rule Coherence

- Significant overlap of requirements affecting conduct of operations and maintenance
 - Configuration management
 - Scope
 - Condition monitoring
- Both have risk-informed perspective
- Must meet both TS and maintenance rule
- Pursuing safety and effectiveness/efficiency benefits from closer linkage (enhancing coherence)

Configuration Management Coherence

- TS have required ACTIONS when LCOs are not met
- 50.65(a)(4): “Assess and manage the increase in risk that may result from...maintenance activities (including but not limited to surveillance, post-maintenance testing, and corrective and preventive maintenance)”
- Enhance configuration management coherence through:
 - Initiative 1 – TS actions end states
 - Initiative 2 – Missed surveillances (SR 3.0.3)
 - Initiative 3 – SR 3.0.4 Mode change flexibility
 - Initiative 4 – Flexible completion times via CRMP
 - Initiative 6 – LCO 3.0.3 actions and completion times
 - Initiative 7 – Non-TS support system operability

Scope Coherence

- 50.36 Criteria for TS
 - Three criteria related to barriers/ DBA
 - Fourth risk-based criteria (addition only)
- 50.65 monitoring scope includes
 - Safety-related SSCs “relied upon to remain functional during and following design basis events...”
 - Nonsafety related SSCs “relied upon to mitigate accidents or transients or used in plant emergency operating procedures...(or) whose failure could prevent safety related SSCs from fulfilling their safety-related functions; or whose failure could cause a reactor scram or actuation of a safety-related system
- Enhance coherence through Initiative 8 – Conform 50.36 and 50.65 scope

Condition Monitoring Coherence

- TS: “Surveillance requirements are requirements relating to test, calibration or inspection to assure necessary quality of systems and components...”
- 50.65: “...monitor the performance or condition of SSCs...in a manner sufficient to provide reasonable assurance ...Adjustments shall be made...to ensure balance between preventing failures and minimizing unavailability...”
- Enhance coherence through Initiative 5 – STI methodology program

Crosscutting Coherence Issues

- Interpretation of the phrase “[SSCs] which probabilistic risk assessment has shown to be significant to public health and safety”
 - TS Criterion 4 – Initiative 8
 - (a)(4) scope of risk assessment
 - SSC treatment categorization methodology
- Technical adequacy of PRA
 - TS Initiatives, especially 4, 5, and 8
 - Draft Regulatory Guide 1122