# RIC 2005
# Session W-A3
# Risk-Informing Special Treatment Requirements 10 CFR 50.69

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# 10 CFR50.69 BACKGROUND

- ➢ **10 CFR 50.69 is a voluntary alternative regulation**
  - ❑ Risk-inform the scope of special treatment requirements ("assurance requirements")
  - ❑ No change in design basis or technical functional requirements

- **Basic structure of section 50.69**
  - ❑ Built around categorization (paragraph (c)) – includes an expert panel that categorizes SSCs into "RISC" bins using PRA and deterministic insights/information
  - ❑ Apply treatment requirements (paragraph (d)) as a function of RISC bin

- **Implemented via license amendment**
  - ❑ NRC staff reviews/approves categorization process

# 10 CFR50.69 STATUS

➢ **Final rule - 10 CFR 50.69 was approved by the Commission on October 7, 2004 (affirmation session)**

➢ **Commission revised the RISC-3 treatment requirements to adopt a more performance-based approach (next slide)**

➢ **Staff published the final rule in the Federal Register on November 22, 2004 (69 FR 68008)**

➢ **Became effective on December 22, 2004**

➢ **Implementation Guidance (NEI 00-04 and RG 1.201)**
  ❑ NEI provided a revised NEI 00-04 on October 29, 2004
  ❑ Staff and NEI met on Dec 14, 2004 to discuss NEI 00-04
  ❑ NEI plans to provide revised NEI 00-04 input in Jan 2005
  ❑ Staff plans to revise RG 1.201 to remove unneeded clarifications/exceptions as a result of revised guidance  - approx mid 2005 (requires ACRS interaction)

# REVISED RISC-3 TREATMENT REQUIREMENTS

➤ Commission deleted (from draft final rule language)

  ❑ Design control requirements

  ❑ Procurement requirements

➤ Commission revised 50.69(d)(2) to

  ❑ Remove programmatic provisions

  ❑ Move design basis (DB) language (was in old 50.69(d)(2)(i)) to preamble requirement - (d)(2)

  ❑ Simplified corrective action

  ❑ Now uses "ensure reasonable confidence"

# REVISED RISC-3 TREATMENT REQUIREMENTS CONT'

➢ **Design control requirements change**
  ❑ 50.69 not changing DB functional requirements
  ❑ 50.59 still applies to all non-treatment related changes

➢ **Procurement requirements change**
  ❑ Deleted - licensees have flexibility to control procurement and receipt inspection to meet 50.69(d)(2) DB language change:
  ❑ Removes parenthetical language – and moves it to 50.69(d)(2)
  ❑ SOC provides the staff's position on DB

➢ **Corrective Action requirement change**
  ❑ Removes documentation requirements (directly worded)
  ❑ Keeps significant condition corrective action requirement

➢ **50.69(d)(2) uses "ensure with reasonable confidence"**
  ❑ Means the licensee is required to provide "reasonable confidence"

# 10 CFR 50.69 IMPLEMENTATION ISSUES

➤ 50.69(b)(2)(iv) – key issue as to what is needed for the submittal to discuss known degradation and CCF

➤ Delta-risk sensitivity vs monitoring and corrective action – what is acceptable ?

➤ "Trial Use" designation for RG 1.201

➤ License condition approval – categorization change control language

# IMPLEMENTATION SCHEDULE

➢ **Schedule for Final 50.69 rule implementation**

❑ Expect NEI to provide revised NEI 00-04 pages per Dec 14 2004 meeting – in mid January 2005

❑ Trial application from Surry – expected June 2005

❑ Will need to go back to ACRS to discuss RG 1.201 in light of changes to RG 1.201/NEI 00-04 (from pilot feedback and interactions)

❑ Pilot effort will support determination of details needed to support a real 50.69 submittal