



RIC 2014 Session Title

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1



Bulletin 2012-01 A Regional Perspective

2



Potential Inspection Activities

- **Possible Temporary Instruction (TI)**
- Sample plants based upon:
 - Different offsite source configurations
 - Different modifications
 - Different analyses
- Eventual inspection activities would get rolled into the baseline inspection effort.
 - Mod/50.59 inspection initially
 - Components Design Basis Inspection (CDBI)

3



Regulatory Basis for Inspection

- **Critical Pieces to Ensure Continued Safety**
 - Establishment of a clear Design Basis.
 - GDC 17 is always applicable, but general in nature.
 - Technical Specification (TS) 3.8.1 establishes requirements for offsite sources.
 - TS 3.8.1 addresses general requirements for offsite source Operability, but it does not explicitly address this function.

4



Regulatory Basis for Inspection (Cont.)

- **The Interim Enforcement Policy establishes this basis by defining the Criteria for detection and automatic actions for open phase conditions.**
 - Technical Specification LCO and Surveillance(s) – Regulatory Basis
 - Inclusion into UFSAR – Design Basis
 - Regulated to 10 CFR 50.59
 - Appendix B would not apply to Non-Safety Related design features
 - Design Criteria

5



Regulatory Basis for Inspection (Cont.)

- **Regulatory and Inspection Challenges**
 - Design Criteria will be difficult to control unless spelled out to some degree in the UFSAR
 - More specific design criteria from the industry would help prevent interpretation differences in the future. (Remember PSB-1 for degraded voltage conditions?)
 - Inspector Training

6
