

Operability – NEI 18-03

2019 RIC

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Background/Progression



NEI 18-03 Scope/Intent



- Focused On Operability Determination
 - Regulatory Foundation
 - TS definition of operability
- Improve Predictability and Efficiency
- Eliminate Distraction – Enhance Safety

NEI 18-03 Key Aspects



- Operability only meaning relative to Tech Specs
- Defined Entry Criteria
- Definitions - Regulatory Foundation
- Code Compliance and Operability
- Licensee Decision
- Continuous Process

Entry Criteria



Defined entry criteria - **All three criteria must be met**

1. Deficient condition must affect a TS SSC installed in an operating unit.
2. The deficient condition must have a functional impact on the SSC.
3. The functional impact of the deficient condition must be substantive (i.e., non-trivial).

Definitions



- Defined Specified Safety Function

- Eliminated
 - Degraded Condition
 - Non-Conforming Condition
 - Functionality removed

Definitions



- Specified Safety Function

"A Specified Safety Function (SSF) is a function assumed to be performed by a system, structure, or component (SSC) in the analyses summarized in the Updated Final Safety Analysis Report, Chapters 6 and 15 (or the plant-specific equivalent chapters). SSFs are the subset of functions that meet one or more criterion in 10 CFR 50.36(c)(2)(ii) from all the functions performed by an SSC, as described in the NRC's Final Policy Statement on Technical Specifications Improvement. For plants with improved standard technical specifications, these functions are normally discussed in the TS Limiting Condition for Operation (LCO) Bases...."

Operability & CAP



- Separate activities
- Re-aligned w/GL 91-18 approach
- Focus on Operability determination
- Issues continue to be evaluated
- Operability is Continuous Process
- CAP activity/timing commensurate w/Safety Significance

Operability & Code



- Separate activities
- Any technically acceptable method can be used to determine if a specified safety function can be met
- Licensed operator decision
 - NRC prior approval not required
- Restoration of Code compliance is governed by CAP

NEXT Steps



- Comment Resolution
- NSIAC Recommendation
- Engage with NRC on Final Document (June/July)
- RUG Workshops
- Implementation Timeline TBD

Questions



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