

Component Reliability and its Relationship to Operability

- Increasing failure rates. GL 91-18 should discuss what a licensee should do with components with increasing failure rates. One suggestion was to push the component into the Corrective Action Program or Maintenance Rule.
- Extent of condition review. GL 91-18 should discuss the extent of condition review with regards to common mode failure risk. Does a licensee need to look at all other similar components in operability determination space or is it best to treat those under the Corrective Action Program
- Mission time. GL 91-18 should clarify what is meant by mission time. What is required to reconstruct the mission time.
- 10 CFR 50.59. The potential application of 50.59 with regard to reliability issues should be addressed. Specifically, there are questions in 50.59 that deal with malfunction likelihood and accident frequency that are potentially related. Other issues to be included are negligible criteria and engineering judgement. There is also situation where a licensee could fail to meet 50.59 criteria and still be operable.
- Manual actions. GL 91-18 should reference other guidance that deals with manual actions replacing automatic actions.
- Performance indicators. Group had a concern with different performance indicators on system reliability issues. Particularly, there was a desire for consistency or prioritization for the programs to help provide some additional guidance on performance indicators.
- Summary. Group did not fully support quantification relative to reliability issues, but supported a qualitative approach to reliability issues in operability determination space.