

## Support System Operability (TS and non-TS equipment)

### Sessions 1 and 2 combined

- Use of the small “o”. Group believes that the definition of operability, the capital “O” for operability should be restricted solely to those things in technical specifications. The revision should clearly only call those things outside of technical specifications functional or capable of performing some function.
- Snubbers. Discussion of current activities under TSTF 372 to address this issue.
- Hazard barriers. Discussion of current activities under RITSTF Initiative 7a (TSTF-427) to address this issue.
- GL 91-18 Section 6.12. Group agreed that this section needed to have consistency between the terms necessary and required, that there was some misunderstanding about what the actual application of those were in different conditions, and whether or not there was always a consistent interpretation on behalf of the industry and the NRC.
- Support system LCOs in technical specifications. Group looked at this issue with regard to the improved technical specifications acknowledging that some licensees still have support system LCOs in their technical specifications. Group would like guidance to be consistent with the way people are doing business since the current wording in Section 6.12 could easily take someone in a direction that is inconsistent with the way it was intended to utilize for those support system LCOs inside of technical specifications.
- Alternate temporary systems. Group would like criteria for determining acceptability of alternate temporary systems. Examples should be provided which should include the type of evaluation and what needs to be considered in the evaluation.
- Technical specification operability versus functionality and licensing basis. Clarification is needed in this area.
- Risk informed initiatives. Group wanted to ensure an integration of the risk informed initiatives, as appropriate, recognizing that risk does not determine operability, however, risk is a part of the consideration of the acceptability of the degraded condition of the support system.
- Licensee knowledge of support systems. Group believes that GL 91-18 currently addresses that licensees should be knowledgeable of what support systems are necessary for technical specification LCOs to be met or to be operable. However, the group does not believe that the GL requires a list to be maintained or to be provided to the NRC.
- Integration of technical specifications and the maintenance rule. Group recognizes that there needs to be a coordination with the support system considerations as to how they impact technical specification LCOs. Additional comment made regarding the use of operability as it relates to maintenance as a criterion for determining availability of support systems.