Update Industry Operability Guidance Initiative

Fall 2018 EQ Technical Conference
Nuclear Utility Group on Equipment Qualification
October 31-November 2, 2018
Clearwater, Florida

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Industry Position

- Inspection Manual (IMC) 0326 is not consistent in defining the conditions that warrant an Operability Determination.

- IMC-0326 uses the different terms to describe the conditions when an Operability Determination should be performed such as:
  - Reasonably indicating a degraded or nonconforming condition
  - Potential degraded/nonconforming conditions
  - Actual degraded/nonconforming conditions

- Typical site performs some type of Operability Assessment roughly two to ten times per day or more.

- Rarely, if ever, is a previously undetected inoperability uncovered.
The nuclear utility industry has not established clear guidance for performing OPERABILITY determinations for Technical Specification structures systems and components. The lack of industry guidance has resulted in inconsistent implementation and expectations. Operability determinations and associated resolution of issues must be appropriately balanced to ensure focus remains on safety.

The industry intends to clarify the conditions/criteria that would lead to entry into the operability determination process as part of the industry effort to develop a standard process guideline.
On June 28, 2018, industry provides NRC with overview of newly created NEI 18-03, “Operability Determination,” and discuss how to enhance the predictability and efficiency of the operability determination.

NEI 18-03 “describes an approach that may be used by the nuclear utility industry to develop plant-specific programs and procedures for evaluating the operability of [SSC] addressed in [TS] when deficient conditions are identified. This document focuses on the operability determination process.”

The industry is not seeking NRC endorsement of NEI 18-09.
Key Points of NEI 18-03

- Utilizes the Improved STS definition of "Operable/Operability"
- Items will continue to be reviewed and assessed
- Emphasis of revised process is on entry (Three Required Criteria)
- Degraded or Nonconforming condition concepts eliminated
- Immediate and Prompt Operability Determination (OD)– no change to existing process
- Defined “specified safety function”
- Consistent with IMC 0326, does not attempt to specify detailed actions when performing operability
- SROs always will retain the option of requesting ODs
Three Required Entry Criteria

Entry into the documented operability determination process would be contingent upon the deficient condition satisfying the three required entry criteria.

- **Criterion 1**: The deficient condition must affect a TS SSC installed in an operating unit.

- **Criterion 2**: The deficient condition must have a functional impact on the SSC. This includes the ability to perform required functions under postulated, off-normal design conditions.

- **Criterion 3**: The functional impact of the deficient condition must be substantive (i.e., non-trivial).
Discussion Between NEI and NRC Are Ongoing
QUESTIONS?