

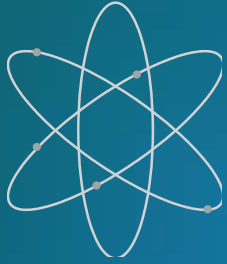


Status of PRM-50-112 Defining "Important to Safety"

**Fall 2016 EQ Technical Conference
Nuclear Utility Group on Equipment Qualification
November 16-18, 2016
Clearwater, Florida**

William Horin, Winston & Strawn, LLP (Counsel to NUGEQ (whorin@winston.com))

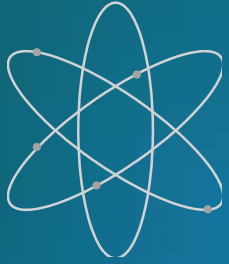
Ron Wise, NEQ Consulting (NUGEQ Technical Consultant (ronwise@aol.com))



PRM-50-112

Defining “Important to Safety”

- PRM-50-112 filed on July 21 2015, and supplemented on August 31, 2015, by Kurt Schaefer (Nuclear Licensing Engineer – GE Nuclear 30 years, 10 Years Consultant; Teaches 10 CFR 50.59, or equivalent, classes in US and United Arab Emirates)
 - Requests the NRC amend § 50.2 to include a definition with specific criteria for determining what SSCs and functions are “important to safety.”
 - The petitioner stated that “[t]he nuclear industry is on its third generation of engineers and regulators with no clear definition of what is ‘important to safety’ ” and that “there is no excuse for not having a concise set of functional criteria defining such a used term.”
- NRC published Notice of Docketing and Request for Comments in Federal Register on January 6, 2016 (81 FR 410)
 - ✓ Comment Period Closed: March 21, 2016.
- 10 Comments Received (NUGEQ, NEI, Exelon, IEEE, GE Hitachi, Applied Control Solutions, LLC, and Public Stakeholder (4))

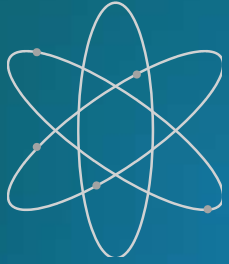


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Overview of NUGEQ Comments

- Supported the NEI comments
- Provided additional discussion re potential impacts in the EQ arena if the definition of “important to safety” were to be amended including:
 - ✓ Since promulgation of § 50.49, there have been few issues with respect to the “important to safety” definition;
 - ✓ Making changes to the key element of the § 50.49 scope definition has the potential to require, just for the EQ program review, millions of dollars of expenditures by each licensee, with no demonstrable safety benefit;
 - ✓ Additional impacts would include re-evaluations in the license renewal arena; and
 - ✓ Unknown unintended consequences from such a rule change could not, of course, be quantified
- **Status – Open**



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QUESTIONS ?