

concluding that the evaluations performed to show a small change in risk remain valid.

In addition, the rule would require that implementation be done for an entire system or structure and not for selected components within a system or structure. This required scope ensures that all safety functions associated with a system or structure are properly identified and evaluated when determining the safety significance of individual components within a system or structure and that the entire set of components that comprise a system or structure are considered and addressed.

III.3.0 Treatment Requirements

Treatment requirements are applied to SSCs commensurate with SSC safety significance and as a function of the RISC category into which the SSCs are categorized.

III.3.1 RISC-1 and RISC-2 Treatment

For SSCs determined by the IDP to be safety-significant (*i.e.*, RISC-1 and RISC-2 SSCs), § 50.69 would maintain the current regulatory requirements (*i.e.*, it does not remove any requirements from these SSCs) for special treatment. These current requirements are adequate for addressing design basis performance of these SSCs. Additional requirements are being added to these SSCs to ensure that their performance remains consistent with the assumed performance in the categorization process (including the PRA) for beyond design basis conditions. For example, in developing the PRA model, a licensee will make assumptions regarding the availability, capability, and reliability of RISC-1 and RISC-2 SSCs in performing specific functions under various plant conditions. These functions may be beyond the design basis for individual SSCs. Further, the conditions under which those functions are assumed to be performed may exceed the design-basis conditions for the applicable SSCs. In the proposed rule, a licensee would be required to ensure that the treatment applied to RISC-1 and RISC-2 SSCs is consistent with the performance credited in the categorization process. This includes credit with respect to prevention and mitigation of severe accidents. In some cases, licensees might need to enhance the treatment applied to RISC-1 or RISC-2 SSCs to support the credit taken in the categorization process, or conversely adjust the categorization assumptions to reflect actual treatment practices. In addition, requirements exist for monitoring and adjustment of treatment processes (or categorization decisions) as needed based upon performance.

III.3.2 RISC-3 Treatment

For RISC-3 SSCs, § 50.69 would impose requirements which are intended to maintain their design basis capability. Although individually RISC-3 SSCs are not significant contributors to plant safety, they do perform functions necessary to respond to certain design basis events of the facility. Thus, collectively, RISC-3 SSCs can be safety-significant and it is important to maintain their design basis functional capability. Maintenance of RISC-3 design basis functionality is important to ensuring that defense-in-depth and safety margins are maintained. As a result, § 50.69(d)(2) would require licensees or applicants to have processes in place that provide reasonable confidence in the capability of RISC-3 SSCs to perform their safety-related functions under design basis conditions throughout the service life. The proposed rule contains high-level requirements for the treatment of RISC-3 SSCs with respect to design control; procurement; maintenance, inspection, test, and surveillance; and corrective action. These alternative treatment requirements for RISC-3 SSCs represent a relaxation of those special treatment requirements that are removed for RISC-3 SSCs by the proposed rule. For example, the alternative treatment requirements for RISC-3 SSCs in proposed § 50.69 are less detailed than provided in the special treatment requirements, and allow significantly more flexibility by licensees in treating RISC-3 SSCs. The Commission is allowing greater flexibility and a lower level of assurance to be provided for RISC-3 SSCs in recognition of their low safety significance, and this recognition includes a consideration for the potential change in reliability that might occur when treatment is reduced from what had previously been required by the special treatment requirements.

The Commission is proposing to specify four processes that must be controlled and accomplished for RISC-3 SSCs: Design Control; Procurement; Maintenance, Inspection, Testing, and Surveillance; and Corrective Action. The high level RISC-3 requirements are structured to address the various key elements of SSC functionality by focusing in these areas. When SSCs are replaced, RISC-3 SSCs must remain capable of performing design basis functions. Hence, the high level requirements focus on maintaining this capability through design control and procurement requirements. During the operating life of a RISC-3 SSC, a sufficient level of confidence is necessary that the SSC continues to be

able to perform its design basis function; hence, the inclusion of high level requirements for maintenance, inspection, test, and surveillance. Finally, when data is collected, it must be fed back into the categorization and treatment processes, and when important deficiencies are found, they must be corrected; hence, requirements are also provided in these areas.

In devising these requirements, the Commission has focused upon those critical aspects of the various processes that must exist to provide assurance of performance. Thus, in the design area, for instance, the design conditions under which equipment is expected to perform, such as environmental conditions or seismic conditions, are still to be met. As another example, in the procurement area, procured items are to satisfy their design requirements. These steps provide the basis for concluding that a newly designed and procured replacement item will be capable of meeting its design requirements, even though the special treatment requirements that previously existed are no longer being required.

In implementing the processes required by the proposed rule, licensees will need to obtain data or information sufficient to make a technical judgement that RISC-3 SSCs will remain capable of performing their safety-related functions under design basis conditions. These requirements are necessary because they require the licensee to obtain the data necessary to continue to conclude that RISC-3 SSCs remain capable of performing design basis functions, and to enable the licensee to take actions to restore equipment performance consistent with corrective action requirements included in the proposed rule.

Effective implementation of the treatment requirements provides reasonable confidence in the capability of RISC-3 SSCs to perform their safety function under normal and design basis conditions. This level of confidence is both less than that associated with RISC-1 SSCs, which are subject to all special treatment requirements, and consistent with their low safety significance.

It is noted that changes that affect any non-treatment aspects of an SSC (*e.g.*, changes to the SSC design basis functional requirements) are still required to be evaluated in accordance with other regulatory requirements such as § 50.59. Section 50.69(d)(2)(i), which focuses upon design control, is intended to draw a distinction between treatment (managed through § 50.69) and design changes (managed through other processes such as § 50.59). As