

cause problems that might invalidate the categorization process assumptions and results, effective implementation would include a determination of the functionality of safety-related SSCs checked using measuring and test equipment that was later found to be in error or defective.

With respect to RISC-3 pumps and valves, the Commission expects licensees to implement periodic testing or inspection, and evaluation of performance data, sufficient to provide reasonable confidence that these pumps and valves will be capable of performing their safety function under design basis conditions. To determine that SSC will remain capable until the next scheduled activity, a licensee would have to obtain sufficient operational information or performance data to provide reasonable confidence that the RISC-3 pumps and valves will be capable of performing their safety function if called upon to function under operational or design basis conditions over the interval between periodic testing or inspections. A licensee may develop the type and frequency of the test or inspection for RISC-3 pumps and valves where sufficient to conclude that the pump or valve will perform its safety function. These tests or inspections may be less rigorous and less frequent than those performed on RISC-1 pumps and valves. For example, a licensee might establish more relaxed criteria for grouping of similar RISC-3 components, or might apply less stringent test acceptance criteria for RISC-3 pumps and valves, than specified for RISC-1 components. The licensee could apply staggered test intervals for the RISC-3 components to provide confidence that the relaxed grouping or acceptance criteria had not resulted in SSC performance that is inconsistent with the categorization process or its assumptions. Licensees should note that performance data obtained for pumps and valves operating under normal conditions may not be capable of predicting their capability to perform safety functions under design basis conditions without additional evaluation or analysis. This does not mean that pumps and valves must be tested or inspected under design basis conditions. Methods exist for collecting performance data at conditions different than design basis conditions that can be used to reach conclusions regarding the design basis capability of components. Examples of such methods are described in Regulatory Guide 1.175, An Approach for Plant-Specific, Risk-Informed Decision making; Inservice Testing, and applicable risk-informed

ASME Code Cases (e.g., OMN-1, OMN-4, OMN-7, OMN-12) as accepted by 10 CFR 50.55a.

V.5.2.4 Section 50.69(d)(2)(iv) Corrective Action Process

Section 50.69(d)(2)(iv) would specify that conditions that could prevent a RISC-3 SSC from performing its safety-related functions under design basis conditions be identified, documented, and corrected in a timely manner. A licensee may obtain information from the inspection, test and surveillance activities discussed above, or from other sources, such as operating experience, that indicates that an SSC is not capable of performing its required functions and thus identifies that corrective action is needed.

In meeting proposed § 50.69, licensees may implement a corrective action process for RISC-3 SSCs that is different than the process established to satisfy 10 CFR Part 50, Appendix B. This more general requirement would allow a graded approach, as well as less stringent timeliness requirements. The Commission believes an effective corrective action process is crucial to maintaining the capability of RISC-3 SSCs to perform their safety-related functions because of the reduction in requirements for other processes for design control; procurement; and maintenance, inspection, test, and surveillance. For example, effective implementation of the corrective action process would include timely response to information from plant SSCs, overall plant operations, and industry generic activities that might reveal performance concerns for RISC-3 SSCs on both an individual and common-cause basis.

V.6.0 Section 50.69(e) Feedback and Process Adjustment

Section 50.69(e)(1) requires the updating of the PRA. The PRA configuration control program must incorporate a feedback process to update the PRA model. The program must require that plant data, design, and procedure changes that affect the PRA models or input parameters be incorporated into the model. This update is to account for plant-specific operating experience as well as general industry experience. In particular, the proposed rule would require the licensee to review changes to the plant, operational practices, applicable industry operational experience, and, as appropriate, update the PRA and SSC categorization in a timely manner but no longer than every 36 months for RISC-1, RISC-2, RISC-3 and RISC-4 SSCs. Changes must be evaluated with respect to the impact on CDF and LERF. If the

change would result in a significant increase in the CDF or LERF or might change the categorization of SSCs, the PRA must be updated in a timely manner; in this context it would clearly not be timely to wait to update the PRA if there would be a significant change in risk. Other changes are to be incorporated within 36 months. The results of the updated PRA and the associated risk categorizations based on the updated PRA information should be used as part of the feedback and corrective action process, and SSCs must be re-categorized as needed.

Section 50.69(e)(2) and (e)(3) contains the requirements for feeding back into the categorization process SSC performance information and data, and for adjusting the categorization and treatment processes as appropriate, with the goal that the validity of the categorization process and its results are maintained. Further, the proposed rule would require the licensee to monitor the performance of RISC-1 and RISC-2 SSCs and make adjustments as necessary to either the categorization or treatment processes. To meet this requirement, the Commission expects licensees to monitor all functional failures (*i.e.*, not just maintenance preventable unavailabilities and failures as is currently required by § 50.65) so that they can determine when adjustments are needed. Licensee monitoring programs will also need to include the monitoring of SSCs that support beyond design basis functions (if applicable) that are not necessarily included in the scope of an existing maintenance rule monitoring program.

If a licensee chooses to categorize a selective set of SSCs as RISC-3, and the categorization of SSCs as RISC-3 is based on credit taken for the performance of other plant SSCs (whether or not these SSCs are within the selective implementation set), then the licensee must maintain the credited performance. This applies to credit taken in: (1) PRA models, inputs and assumptions; (2) screening and margin analyses; and (3) IDP deliberations. This implies that the licensee must ensure that the credited SSCs perform their functions per § 50.69(d)(1), and the performance of these SSCs must be monitored per § 50.69(e)(2).

For RISC-3 SSCs, the proposed rule would require the licensee to consider the performance data required by § 50.69(d)(2)(iii) to determine whether there are any adverse changes in performance such that the SSC unreliability values approach or exceed the values used in the evaluations conducted to meet § 50.69(c)(iv) and make adjustments as necessary to either