

Unreviewed Safety Question Panel

**USQ Interest Group
Safety Analyst Working Group
May 2007**

Panel Chair

David Satterwhite, LANL, Safety Basis Programs Group Leader

Discussion Topics

- **Original publication of 10 CFR 830 in the Federal Register with Comment II and Response**
- **Use of a Nonconformance Report (NCR) versus a Potentially Inadequate Safety Analysis (PISA)**
- **Other?**

Comments published in Federal Register/Vol. 66, No. 7 on 10 CFR 830

II. *Comment:* Several commentors stated that including design features as a section in the technical safety requirements, instead of allowing the design features to be included in the documented safety analysis, is expensive and provides no safety benefit.

Comments published in Federal Register/Vol. 66, No. 7 on 10 CFR 830 (continued)

Response: It is important that certain design features be included in the technical safety requirements. The design features to be included in a section of the technical safety requirements are those which are regarded as important in establishing the safety basis. These design features should not be changed without DOE approval. Since changes to the technical safety requirements must be approved by DOE, any changes to design features identified as technical safety requirements would require DOE approval. If these important design features are just included in the description of the facility in the documented safety analysis, alterations would be subject to the USQ process. If the contractor determines that the change does not involve a USQ, then the change may not be submitted for prior DOE approval.

LANL considerations for modifications to structures with design feature properties

- **TSR Design Features are treated exactly like other TSR SSCs. No change can be made to them without DOE/NNSA approval.**
- **When a change is proposed to a TSR Design Feature, we prepare a Hazard Analysis of the impact, propose new controls (if necessary), compensatory measures, or temporary controls, and submit the analysis to DOE/NNSA for approval before the change is made.**
- **Where design features are simply a listing of SSCs without any functional criteria or scoping criteria specified, literal interpretation of the Response would prevent changing glovebox gloves without requesting prior approval.**

Bottom line, What Is Change?

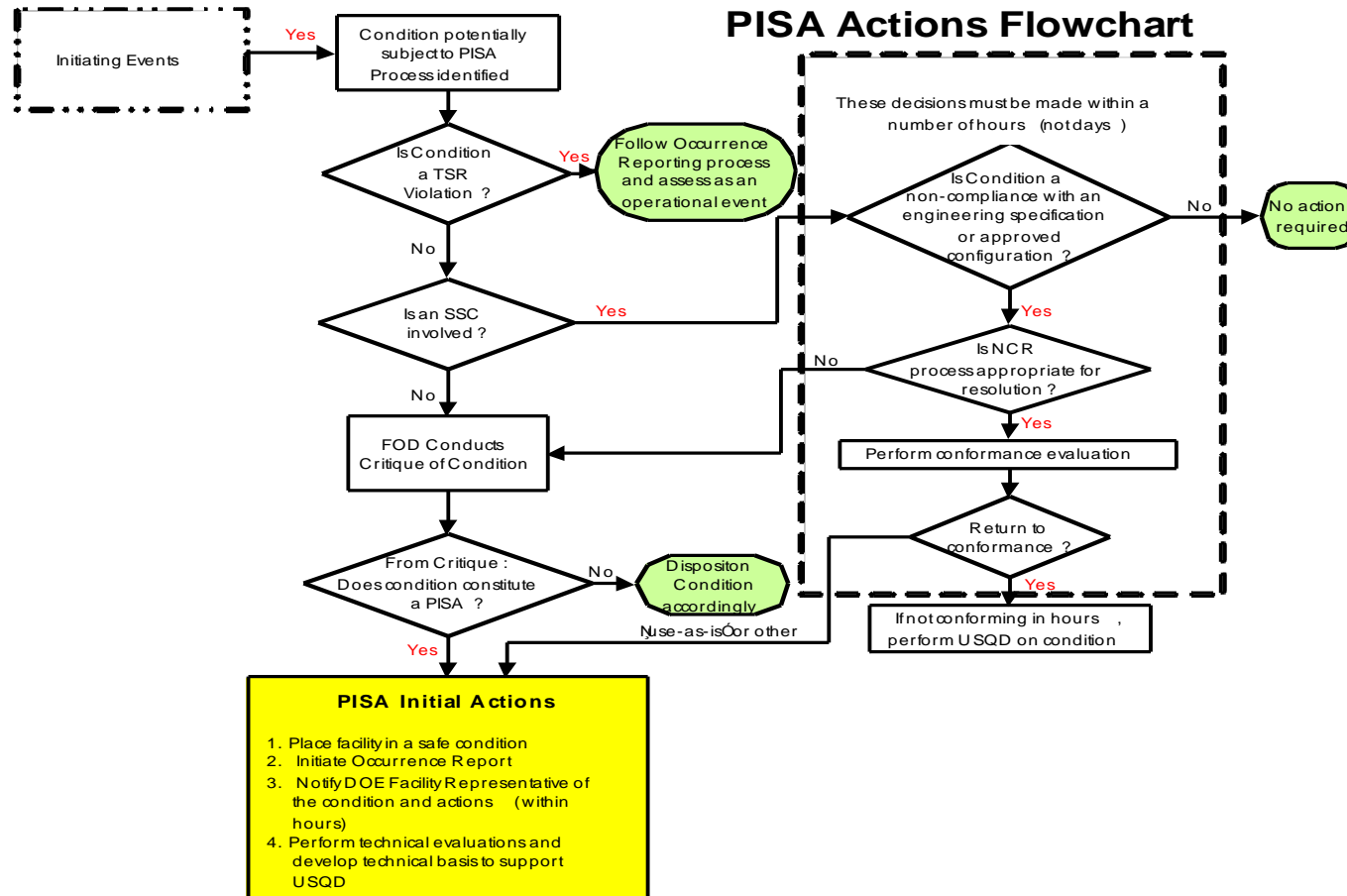
- **If we write the DF more in line or by using the safety function, then as long as the safety function was not impacted/changed then the DF was not changed. An engineering evaluation could be performed to assess if the safety function was impacted or changed.**

Nonconformance Report (NCR) versus PISA

For Safety Related SSCs, it is important to first determine if the condition is more appropriately categorized as a:

- 1) Non-Conforming condition under the QA nonconformance report (NCR) process ,**
- 2) a Technical Safety Requirement (TSR) violation, or**
- 3) a PISA.**

-Nonconformance Report (NCR) versus PISA



Contact Information

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