

Existing Requirements and Guidance

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Policy

Requirements (10 CFR 830 Subpart B)

“DOE should promulgate a set of requirements...”

- Requirements only exist in the rule
 - 830.204(b)(4) ...derive hazard controls...
 - 830.3 Hazard controls means ... (4) Technical safety requirements...
 - 830.3 Technical safety requirements (TSRs) means the limits, controls, and related actions that establish the specific parameters and requisite actions for the safe operation of a nuclear facility...and include...administrative and management controls...

Requirements (continued)

- Rule: high-level requirements, not to the level of detail recommended, even for SC and SS SSCs
- Rule safe harbors for DSA methodologies can become requirements if committed to
- Methodologies vs. guidance issue

Existing Guidance

DSA and TSR Implementation Guides

- Encourage design and engineered controls over administrative controls for safety
- High consequence events preferably should have safety SSCs
- Lower consequent events may have administrative controls playing more prominent role
- Lists attributes that can increase reliability and effectiveness of administrative controls (independent verification, training, drills, etc.)
- Administrative controls should be considered for defense-in-depth rather than for primary or redundant controls
- Administrative controls necessary to meet specific safety criteria need to be described in the hazard analysis and limiting parameters described in the DSA chapter on Derivation of TSRs

Existing Guidance

DOE-STD-3009

- Expected products of (Chapter 5, Derivation of TSRs) include: ...Information with sufficient basis from which to derive TSR administrative controls for specific control features.
- When TSR administrative controls are used for purposes other than generic coverage of safety management programs, descriptions should be sufficiently detailed that a basic understanding is provided of what is controlled and why.