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Licensing Activities

Activity Changes to Safety Analysis Report (SAR)

1.0 Purpose This guideline provides for the evaluation of the safety analysis report (SAR) amendment process.

2.0 Scope This guideline outlines a method to review the activities associated with changes to the SAR and include the following:

- The system established to identify modifications and changes to the facility or procedures as described in the SAR.
- The methods for obtaining NRC approval prior to implementation of those modifications or changes that involve a technical specification change and/or an unreviewed safety question.
- The system for review, approval, and incorporation of changes as amendments to the SAR.

References

1. 10CFR Part 50.71(e), "Maintenance of Records, Making of Reports."
2. 10CFR50.54, "Conditions of Licenses."
3. NRC 37301, "Comparison of As-Built Plant to SAR Description."
4. 10CFR50.59, "Changes, Tests and Experiments."

3.0 Guidelines

3.1 In preparation for and during the conduct of this surveillance

- Obtain and review plant technical specifications, implementing procedures, instructions, and drawings governing this activity.
- Prepare a guide or checklist using the selected items from this guideline.
- Review past surveys, audits, surveillances, and other evaluations/assessments.
- Ensure that checklists include, where applicable, actual observations of performance, general plant conditions, radiological work practices, housekeeping, work document controls and use, and safety practices.

Note: Refer to Chapter 1 for specific details on the attributes listed above.

3.2 Verify that the system for identification of changes, technical evaluation, plant approval and revision of the SAR is being implemented.

- A. Ascertain if there are SAR changes in progress. If so, schedule the surveillance so change activities and processes can be observed. This could include observation of the onsite review committee approval of an SAR change.

- 3.3 Determine the date of the latest SAR amendment and select a sample of changes to be reviewed.
- 3.4 For the period covered by the selected amendments, review a sample of plant modifications and procedure changes. Verify that the changes were incorporated into the SAR, as applicable (i.e., if the facility or procedures as described in the SAR were changed).
- 3.5 For each of the above selected amendment packages one may
 - A. Verify the amendment packages are complete (e.g., all comments resolved and required reviews and approvals are documented and signed off).
 - B. Verify that involved AE, NSSS, or consultant actions were completed and incorporated, if any.
 - C. Verify that NRC approval was obtained for changes determined to involve an unreviewed safety question prior to implementation.
 - D. For amendments requiring a technical specification change, verify that a license amendment was received prior to implementation.
- 3.6 Verify that state regulations were considered in generation of the selected SAR amendments.
- 3.7 Verify that the procedures for distribution and control of SAR manuals and SAR amendments are being followed.
- 3.8 (optional verification) Perform a facility walkdown of modified equipment/instrumentation to verify conformance to revised plant documents such as:
 - A. Mechanical and fluid systems to determine that the physical installation is in agreement with P&IDs.
 - B. Technical specification surveillance test procedures to ensure that they can be accomplished with the as-built plant.
 - C. Control and logic instrumentation to determine that they conform to that described in the SAR.

4.0 Other Guidelines for Consideration

- 4.1 See Chapter 1, "General Quality Surveillance Guidance."
- 4.2 See Chapter 5, "Emergency Facilities and Equipment."
- 4.3 See Chapter 6, "Control of Design Input."
- 4.4 See Chapter 6, "Safety Analysis Controls."
- 4.5 See Chapter 6, "As-Built Verification."
- 4.6 See Chapter 11, "10CFR50.59 Evaluations."
- 4.7 See Chapter 11, "Changes to Technical Specifications."