Change Pathways

- Two implementation paths
  - Change Request (CHG)
    - Used for all changes from administrative on up
    - If Items Relied on for Safety (IROFS) are involved, CHG feeds into the SER process
  - Safety Evaluation Request (SER)
    - Formal review by all safety disciplines
    - Requirements and controls are presented to a Change Review Board (CRB) for approval
SER Process for NCS Controls

- NCS analysis including IROFS and accident sequences are approved by a NCS peer reviewer, SER originator, an area representative and NCS management
- All safety requirements are presented to the CRB for approval
- Requirements are grouped by phase of implementation
  - Design/Construction
  - Pre-Operational – equipment testing, but no SNM
  - During Operation – production allowed with SNM
- Provided to the originator as the person responsible for the implementation
SER Process

- All safety groups that have requirements in a phase must verify the proper implementation prior to the next phase beginning.

- Area management and Licensing group must also sign off.
SER Process

- SER Originator is the person responsible for ensuring all requirements are met

- NCS Actions:
  - Review any procedure changes
  - Review any drawing changes
  - Inspect passive and active engineered controls (2 engineers)
  - Inspect area for proper NCS postings
  - Review revisions to the Safety Analysis Report (SAR)
  - Issue a Nuclear Safety Release (NSR) documenting proper implementation of the NCS requirements
Issues in the SER Process

- Communications!

- Must be implemented as approved
  - Changes or improvements must be resubmitted and approved
  - No job is complete until the paperwork is done

- Production schedules and pressures
Response to NCS Violations

- Operators are told if they see a NCS Violation:
  - Stop work
  - Do not correct the situation
  - Report it to their supervisor immediately
- Supervisors are to contact NCS immediately (24/7)
- NCS will respond and assess the situation
  - May authorize operators to correct the situation
  - May require activation of the Emergency Operation Center if severe enough
- Notification of the NRC Operations Center may be required depending on the severity of the upset