

C.I.17 Quality Assurance and Reliability Assurance

Consistent with the approach taken in the new update to Chapter 17 of NUREG-0800, Sections C.I.17.1, C.I.17.1.1, C.I.17.2, and C.I.17.3 of this chapter point the reader to Section C.I.17.5 for the required format and content of a QA program during design, construction, and operation.

C.I.17.1 Quality Assurance During the Design and Construction Phase

COL applicants should refer to Section C.I.17.5 for a complete discussion of the required format and content of a QA program during design, construction, and operation.

C.I.17.1.1 Early Site Permit Quality Assurance Measures

COL applicants should refer to Section C.I.17.5 for a complete discussion of acceptable format and content of a QA program during design, construction, and operation. This section will identify those aspects of a QAPD associated with ESP versus other applications, such as design certification and COL.

C.I.17.2 Quality Assurance During the Operations Phase

COL applicants should refer to Section C.I.17.5 for a complete discussion of acceptable format and content of a QA program during design, construction, and operation.

C.I.17.3 Quality Assurance Program Description

COL applicants should refer to Section C.I.17.5 for a complete discussion of acceptable format and content of a QA program during design, construction, and operation.

C.I.17.4 Reliability Assurance Program Guidance

C.I.17.4.1 New Section 17.4 in the Standard Review Plan

The NRC staff revised the SRP to add the new Section 17.4, “Reliability Assurance Program (RAP).” This new SRP section addresses the Commission’s policy for the RAP that is presented in Item E of SECY-95-132. Section 17.4 of the SRP is the principal guidance for NRC reviews of a RAP submitted by a COL applicant.

C.I.17.4.2 Reliability Assurance Program Scope, Stages, and Goals

The RAP applies to those plant SSCs that are identified as being risk-significant (or significant contributors to plant safety), as determined by using a combination of probabilistic, deterministic, or other methods of analysis, including information obtained from sources such as plant- and site-specific PRA, nuclear plant operating experience, relevant component failure databases, and expert panels. The purpose of the RAP is to provide reasonable assurance of the following four considerations:

- (1) A reactor is designed, constructed, and operated in a manner that is consistent with the assumptions and risk insights for these risk-significant SSCs.
- (2) The risk-significant SSCs do not degrade to an unacceptable level during plant operations.
- (3) The frequency of transients that challenge SSCs is minimized.
- (4) These SSCs function reliably when challenged.

The RAP is implemented in two stages. The first stage applies to reliability assurance activities that occur before the initial fuel load. The goal of the RAP during this stage is to ensure that the reactor design meets the considerations identified above, through the reactor design, procurement, fabrication, construction, and preoperational testing activities and programs. The second stage applies to reliability assurance activities for the operations phase of the plant life cycle. The objective during this stage is to ensure that the reliability for the SSCs within the scope of the RAP is maintained during plant operations. Reliability assurance activities are integrated into existing operational programs (i.e., Maintenance Rule, surveillance testing, ISI, IST, maintenance, and quality assurance). Note that for the Maintenance Rule program to be credited in the implementation of the RAP in the operational phase, all operational phase/site-specific RAP SSCs must be included in the high-safety-significant (HSS) category within the scope of the Maintenance Rule program. Individual component reliability may change throughout the course of plant life because of a number of factors, including aging and changes in suppliers and technology. Changes in individual component reliability values are acceptable as long as overall plant safety performance is maintained within the licensing basis.

C.I.17.4.3 Reliability Assurance Program Implementation

The RAP is implemented in several phases. The first phase implements the aspects of the program that apply to the reactor design process. The second phase is the site-specific phase, which introduces the plant's site-specific design information to the RAP process. Tier 1 ITAAC are required for these phases. The COL applicant establishes the probabilistic, deterministic, and other methods to determine the SSCs under the scope of the RAP and ITAAC. The COL applicant is also responsible for describing how it will integrate reliability assurance activities into existing programs (e.g., Maintenance Rule, surveillance testing, ISI, IST, maintenance and QA).

C.I.17.4.4 Reliability Assurance Program Information Needed in a COL Application

The provisions of 10 CFR 50.34(h) and 10 CFR 52.79(a)(41) require that COL applicants include an evaluation of the facility against the NRC's application and review guidance SRP that is in effect 6 months prior to the docket date of the application of a new facility. A COL applicant should provide the following in Chapter 17 of the safety analysis report in accordance with the provisions in SRP Section 17.4:

- a description of the RAP, including scope, purpose, and objectives
- the deterministic or other methods used for evaluating, identifying, and prioritizing SSCs according to their degree of risk significance (probabilistic/PRA methods and results for evaluating, identifying, and prioritizing SSCs to be addressed in Section C.I.19)
- a prioritized list of SSCs designated as risk-significant based on deterministic or other methods (a prioritized list of SSCs designated as risk-significant based on probabilistic/PRA methods to be addressed in Section C.I.19)
- the quality controls (organization, design control, procedures and instructions, records, corrective action, and audit plans) for developing and implementing the RAP
- how procurement, fabrication, construction, and test specifications for the SSCs within the scope of the RAP ensure that significant assumptions, such as equipment reliability, are realistic and achievable
- how QA requirements are implemented during the procurement, fabrication, construction, and testing of SSCs within the scope of the RAP

- The integration of the RAP activities into the applicant’s existing operational programs (i.e., Maintenance Rule, surveillance testing, IST, ISI, maintenance and QA) must be ensured. Note that for the Maintenance Rule program to be credited in the implementation of the RAP in the operational phase, all operational phase/site-specific RAP SSCs must be included in the HSS category within the scope of the Maintenance Rule program.
- the process for providing corrective action for design and operation errors that degrade non-safety-related SSCs within the scope of the RAP
- ITAAC for the RAP
- expert panel qualification requirements, if an expert panel is used

If other sections or chapters of the applicant’s FSAR provide more detailed information regarding particular aspects of the RAP (e.g., the use of the plant- and site-specific PRA, the methods used in identifying and prioritizing SSCs in accordance with their risk significance), it is acceptable to provide a cross-reference to the specific section or chapter. Describing these aspects of the applicant’s RAP in Chapter 17 of the FSAR in accordance with the provisions in SRP Section 17.4 is an acceptable method for meeting the Commission’s policy for a RAP in SECY-95-132.

C.I.17.5 Quality Assurance Program Guidance

C.I.17.5.1 COL Applicant QA Program Responsibilities

An applicant is responsible for the establishment and implementation of a QA program applicable to activities during design, fabrication, construction, testing, and operation of the nuclear power plant. The regulation at 10 CFR 52.79(a)(25) describes the QA information that the application must contain.

C.I.17.5.2 Updated SRP Section 17.5 and the QA Program Description

The NRC staff revised the SRP to add the new Section 17.5, “Quality Assurance Program Description—Design Certification, Early Site Permit and New License Applicants.” This new SRP section addresses QAPD provisions for COL applicants. The NRC staff reviews and evaluates QAPDs in accordance with the applicable sections of the SRP. Section 17.5 of the SRP is the principal guidance for NRC reviews of a QAPD submitted by a COL applicant. A COL applicant may submit its QAPD in two phases. The first phase could apply to design, fabrication, construction, and testing QA activities, and the second phase could apply to operational QA activities. The requirements for the two phases are fully defined in SRP 17.5. Regardless of the approach, the NRC would review and evaluate QAPDs before issuing the COL. Chapter 17 of the FSAR should incorporate the QAPD (or QAPDs) by reference.

C.I.17.5.3 Evaluation of the QAPD Against the SRP and QAPD Submittal Guidance

COL applicants may use an existing QAPD that the NRC has approved for current use for either or both phases, provided that they identify and justify alternatives to, or differences from, the SRP in effect 6 months prior to the docket date of the application of a new facility.

If not addressed by an NRC approved QAPD, Chapter 17 of the FSAR should also describe the extent to which the applicant will delegate the work of establishing and implementing the QA program or any part thereof to contractors. The FSAR should also clearly delineate those QA functions that are implemented within the applicant’s QA organization and those that are delegated to other organizations. In addition, the FSAR should describe how the applicant will retain responsibility for, and maintain

control over, those portions of the QA program delegated to other organizations. The FSAR should identify the responsible organization and the process for verifying that delegated QA functions are effectively implemented. The FSAR should identify major work interfaces for activities affecting quality and should describe how clear and effective lines of communication between the applicant and its principal contractors are maintained to assure coordination and control of the QA program.

C.I.17.6 Description of the Applicant's Program for Implementation of 10 CFR 50.65, the Maintenance Rule

The applicant should describe its program for Maintenance Rule implementation in accordance with NUMARC 93-01, "Industry Guidance for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," as endorsed by RG 1.160 including, but not limited to, the following areas:

- (1) The applicant should explain and justify deviations from the guidance in NUMARC 93-01 and RG 1.160.
- (2) At the time of the review, the NRC-endorsed version of the industry guidance on implementation of 10 CFR 50.65(a)(4) may still be contained in the February 22, 2000, revision to Section 11 of NUMARC 93-01, which was endorsed by RG 1.182. This is the effective guidance for 10 CFR 50.65(a)(4) until the NRC endorses a later revision of NUMARC 93-01 (later than Revision 2) that incorporates this guidance through a later revision of RG 1.160 (later than Revision 2) which will supersede RG 1.182. RG 1.182 will then be cancelled.
- (3) Applicants referencing a certified design must address the COLA information or action items relevant to the Maintenance Rule in Chapter 17 of the SER-approved generic design certification document.
- (4) Submission of actual procedures or software for review is not required or expected for the COL application, but they must be available for NRC inspection by the time the program is required to be implemented, i.e., by the time fuel load is authorized.
- (5) If an applicant proposes to use the existing Maintenance Rule program used for its operating plants for new plants, applicability to, and adjustments required by the new plant design should be addressed.

C.I.17.6.1 Scoping per 10 CFR 50.65(b)

The applicant should describe its process for determining which plant structures, systems, or components, will be included in the scope of the Maintenance Rule program in accordance with paragraph (b) of the rule and the NRC-endorsed guidance. The program description should identify that additional SSC functions may be added to or subtracted from the Maintenance Rule scope prior to fuel load, as appropriate, as additional information is developed (e.g., EOPs) after the license is issued. The description of the Maintenance Rule scoping process should address:

- (1) The criteria for including safety-related SSCs relied upon to remain functional during and following DBE in accordance with 10 CFR 50.65(b)(1)
- (2) The criteria for including nonsafety-related SSCs in accordance with 10 CFR 50.65(b)(2)
 - (a) The accidents or transients referred to in 10 CFR 50.65(b)(2)(i) are those described in the FSAR
 - (b) SSCs that are "used in plant emergency operating procedures (EOPs)" per 10 CFR 50.65(b)(2)(i), are as described in Paragraph 1.1.2 of RG 1.160, Rev. 2. Note that this differs from the corresponding description in NUMARC 93-01, Rev. 2. The applicant's

program should reflect the description in RG 1.160, Rev. 2, until this description, currently under review for revision, is changed in a future revision of NUMARC 93-01 and RG 1.160. The latest revision of RG 1.160 in effect at the time of the COL application should be followed.

NOTE: The NRC's interpretation of the meaning of the phrase "used in ...EOPs" is explained in the statements of considerations for the Maintenance Rule and will be amplified and clarified in a future revision to RG 1.160 and this is expected to be reflected in a future revision to NUMARC 93-01. The amplified and clarified definition will be as follows: SSCs used in the EOPs that are required to be in the scope of the Maintenance Rule program are those that are directly used to mitigate the accident or transient (explicitly mentioned in the EOPs or in steps of referenced procedures needed to accomplish the EOP step) and those whose use is implied and that provide a significant portion of the mitigating function. For the purposes of this definition, significant proportion of the mitigating function means that the implied-use SSC is essential to the performance of one or more EOP steps and there are no reliable and consistently readily available (under EOP conditions) alternatives. SSCs that do not provide or support a mitigating function, but are included in the EOPs for other reasons, for example, operator convenience or simplifying EOP compliance, equipment protection, etc., are not necessarily required to be in the Maintenance Rule scope under 10 CFR 50.65(b)(2)(i).

If the amplified and clarified definition is in effect at the time of the COL application, the applicant should describe the process for identifying SSCs explicitly mentioned in the EOPs (including those mentioned in referenced procedures), but that are proposed not to be included in the Maintenance Rule scope. The process for exclusion from scope should address the bases for exclusion from scope (e.g., not used for accident or transient mitigation), the bases for inclusion in the EOPs (e.g., operator convenience, equipment protection), the portion of any and all mitigating functions provided, the expectation of reliability in EOP application(s), and the means by which operators are alerted (e.g., procedural warnings, cautions, disclaimers, signs, etc.) to reduced assurance or expectation of reliability.

- (c) SSCs whose failure could prevent safety-related SSCs from fulfilling their safety-related functions per 10 CFR 50.65(b)(2)(ii). Describe how the process considers system interdependencies, including failure modes and effects of nonsafety-related SSCs (e.g., support systems) that could directly affect safety-related functions.
- (d) SSCs whose failure could cause scrams or unwanted engineered safeguard feature actuations and those whose failure caused a reactor SCRAM or actuation of safety-related systems at your plant or plants of similar design per 10 CFR 50.65(b)(2)(iii). Describe the process for identifying and using relevant utility-specific and industry-wide operating experience.

NOTE: If at the time of the COLA, the Commission has approved the applicant's program for implementing 10 CFR 50.69 for its new reactor plant, the requirements of 10 CFR 50.69 may be followed instead of those of 10 CFR 50.65 for RISC-3 and RISC-4 SSCs in the scope of the Maintenance Rule except for the purposes of 10 CFR 50.65(a)(4). In this case, the applicant should describe its process for identifying RISC-3 SSCs among those in Maintenance Rule scope under 10 CFR 50.65(b)(1), and RISC-4 SSCs among those in Maintenance Rule scope under 10 CFR 50.65(b)(2) and for treatment under 10 CFR 50.69 of those RISC-3 and RISC-4 SSCs that would otherwise be treated in accordance with 10 CFR 50.65. Deviations in this process from SSC risk classification and treatment in accordance with NUMARC 93-01, as endorsed by RG 1.160, where it would result in classifying an SSC as RISC-3 or RISC-4 that otherwise would be classified as HSS under NUMARC 93-01, as endorsed by RG 1.160, or would otherwise be classified as HSS consistent with a new reactor design, should be identified and explained.

- (3) Specific information on the actual SSCs within the scope of the Maintenance Rule program will be reviewed as part of the operational program implementation inspection by the NRC, including, for each SSC in scope, the following:
- (a) Specific Maintenance Rule requirement(s) in 10 CFR 50.65(b) that require the SSC to be in scope.
 - (b) For each SSC, for each paragraph (b) scoping criterion, the function(s) that require the SSC to be in scope.
 - (c) For each SSC, for each paragraph (b) scoping criterion, as applicable, the failure modes and effects that require the SSC to be in scope.
 - (d) For each SSC scoping function or vulnerability, the functional performance requirements/success criteria and/or functional failure definitions and implications.
- (4) The applicant's submittal should describe the process for determining the safety/risk significance classification of SSCs within the scope of the Maintenance Rule program, including risk metrics/importance measures and values, operating experience, vendor information, design reliability assurance program (D-RAP) scope (modified for the operations phase as necessary), and any other factors considered by the expert panel. The Maintenance Rule program description should address the criteria for risk ranking of passive components in the new plant designs, especially if it involves a deviation from NUMARC 93-01 and RG 1.160.
- (5) If the applicant proposes to credit its Maintenance Rule program (along with QA, testing, surveillance and underlying maintenance programs) in implementing reliability assurance in the operations phase, the applicant should include a description of how the D-RAP SSCs (as identified in Section 17.4.1) will be included in the Maintenance Rule program scope and also included in the HSS category.

In addition, the process and procedures controlling how the D-RAP SSC list may be modified by site-specific requirements and information (e.g., SSCs included in the EOPs) should be described. Because not all modifications (if any) to the D-RAP list are expected to be available at the time of the combined license application (COLA) (e.g., the EOPs are not expected to be fully developed at this time), it is important that information provided in the FSAR clearly identifies the scope, purpose and essential elements of the program, such that there is assurance that the design reliability established by the D-RAP will be maintained.

The safety/risk classification and treatment of SSCs in the Maintenance Rule program scope, including those in the D-RAP scope, and the modified RAP scope for the operations phase, will be reviewed during NRC inspection.

- (6) The applicant's submittal should describe the process for determining the type of monitoring (i.e., performance (availability and/or reliability), and/or condition) and level (e.g., component, system, classes of components, train, or plant) of monitoring/tracking. Classes of components means SSCs or equipment (e.g., circuit breakers, motorized valve actuators, etc.) that may need to be monitored/tracked at the component level or in special component classes or "pseudo systems" that may involve applications in multiple systems and the bases thereof (e.g., industry operating experience (IOE), common failure modes, etc.)

The standby or continuously operating status and associated type of monitoring and level of monitoring/tracking and the basis thereof of each SSC within the scope of the Maintenance Rule program will be reviewed by NRC inspection.

C.I.17.6.2 Monitoring per 10 CFR 50.65(a)

Specific SSCs, if any, whose performance or condition will be monitored initially per paragraph 50.65(a)(1) and the basis thereof will be reviewed by NRC inspection.

The program description for monitoring in accordance with 10 CFR 50.65(a)(1) should address the following:

- (1) The process for establishing performance or condition monitoring goals for SSCs in (a)(1) status, including how goals are ensured to be commensurate with safety and how IOE is taken into account.

For each SSC to be in (a)(1) status, the performance monitoring (availability and reliability) or condition monitoring goals established, the basis thereof, how the goals are commensurate with safety and how IOE was taken into account will be reviewed during NRC inspection.

- (2) The process for disposition of SSCs in (a)(1) status that do not meet goals, including administration of corrective action. The applicant should describe how the program will ensure prompt, comprehensive and thorough corrective action that (a) addresses the proximate and ultimate causes of degraded performance or condition, (b) encompasses the extent of condition, and (c) institutes preventive measures, including changes that may be required in maintenance and/or maintenance support practices, procedures and training. This discussion should also address how failures will be evaluated against Maintenance Rule functions, since not all failures that cause loss of some function are Maintenance Rule functional failures (MRFFs), and also how maintenance-preventable functional failures (MPFF) will be identified and dispositioned.

Any plant management policies, procedures or practices that involve the (a)(1) status of Maintenance Rule SSCs, e.g., for Maintenance Rule staff performance evaluation, etc., will be reviewed during inspection.

The process for determining which SSCs within the scope of the Maintenance Rule program will be tracked to demonstrate effective control of their performance or condition in accordance with paragraph 50.65(a)(2). The (a)(2) process should address the following:

- (1) The process for developing performance criteria or condition monitoring criteria used to demonstrate effective control of performance or condition for SSCs in (a)(2) status. The applicant's submittal should explain how the program ensures that performance criteria are commensurate with safety (including PRA insights) and good engineering practice, take industry operating experience into account, and are reasonable and verifiable, i.e., achievable and sufficiently sensitive to degraded performance or condition such that meeting them could adequately demonstrate effective control of the performance or condition of the SSC through appropriate preventive maintenance and such that the SSC would remain capable of performing its function(s) and not fail in a manner adverse to safety.

The program description should address how effective control of performance or condition of SSCs in (a)(2) status will be demonstrated including condition monitoring of passive SSCs (e.g., structures) and SSCs for which the reliability performance criterion has been set to zero failures allowed, if any.

For each SSC to be in (a)(2) status, performance (availability and/or reliability) criteria or condition monitoring criteria will be reviewed during NRC inspection.

- (2) For reliability performance criteria, the process for defining and determining and treating functional failures, MRFFs, MPFFs, and repetitive MPFFs.

- (3) For availability performance criteria, the process for defining and tracking availability or unavailability (planned and unplanned), including exceptions and credits and the basis thereof.
- (4) For condition monitoring criteria, the process for addresses sensing, surveillance, tracking & trending, action levels (predictive maintenance), etc.
- (5) The process for disposition of SSCs for which effective control of performance or condition is not demonstrated (including not meeting performance criteria or condition monitoring criteria). Conditions under which the expert panel may justify not placing an SSC in (a)(1) status when performance criteria are not met or are exceeded as appropriate should be described.
- (6) The process for identification and treatment of SSCs categorized in a "run-to-failure" status

NOTE: The NRC is considering amplification and clarification of the guidance on run-to-failure SSC screening and treatment considerations (and will also be reviewed during inspection) as follows:

- (a) SSC function(s) and success/failure criteria
- (b) ability to detect degradation in performance or condition prior to failure
- (c) ability to predict failure based on IOE (e.g., average failure rates, application vulnerabilities, mean times between failure, etc.) and vendor information
- (d) consequences of failure (modes, effects, safety significance), both with and without prompt detection and correction/repair or replacement (e.g., single point vulnerabilities)
- (e) ability promptly to detect failure (e.g., self revealing)
- (f) means to ensure prompt identification and resolution
- (g) procedures for identification and disposition of excessive failure rates (including vendor interaction).

C.I.17.6.3 *Periodic Evaluation per 10 CFR 50.65(a)(3)*

Identify and describe the program for periodic evaluation of the Maintenance Rule program in accordance with 10 CFR 50.65(a)(3). Ensure that this information includes the following considerations:

- (1) scheduling and timely performance of 10 CFR 50.65(a)(3) evaluations
- (2) documenting, reviewing, and approving evaluations as well as providing and implementing results
- (3) making adjustments to achieve or restore balance between reliability and availability
- (4) applying industry operating experience

C.I.17.6.4 *Risk Assessment and Management per 10 CFR 50.65(a)(4)*

Describe the program for maintenance risk assessment and management in accordance with 10 CFR 50.65(a)(4). The program description should address how removing SSCs from service will be evaluated, since it is important to be aware of what Maintenance Rule function(s) is/are being lost so the impact of removing multiple SSCs from service can be determined. For qualitative risk assessments, the program description should explain how the risk assessment and management program will preserve plant-specific key safety functions. The 50.65(a)(4) program description should address (but not be necessarily limited to) the following areas:

- (1) determination of the scope (or limited scope) of SSCs to be included in 10 CFR 50.65(a)(4) risk assessments
- (2) risk assessment and management during work planning, addressing as a minimum: qualitative, quantitative or blended approach in different modes of plant operation, pre-established plant risk categories or bands and basis (e.g., baseline core damage frequency multiples (address time limits), incremental conditional core damage probability), defense in depth, preservation of key safety functions, *standard risk management actions for the various risk bands*, provisions for configuration-specific risk management plans.
- (3) risk assessment and management of emergent conditions and updating risk assessments as maintenance situations and plant conditions and configurations are changed
- (4) assessment (quantitative and qualitative capabilities) and management of risk of external events or conditions

NOTE: The NRC is considering amplification and clarification of the guidance on consideration and management of the risk of external events or conditions to better address fire (internal, external, and fire-risk-sensitive maintenance activities), severe weather, internal and external flooding, landslides, seismic activity and other natural phenomena, and grid/offsite power reliability for grid-risk-sensitive maintenance activities. The need for this amplification and clarification is expected to be explained in an NRC generic communication. Improved guidance is expected to be provided in a future revision of NUMARC 93-01, "Guidelines for Industry Actions to Assess Shutdown Management," and will be endorsed by a future revision to RG 1.160.

- (5) assessment and management of risk of maintenance activities affecting containment integrity
- (6) assessment and management of risk of maintenance activities when at low power or when shut down (including implementation of NUMARC 91-06)
- (7) assessment and management of risk associated with the installation of plant modifications and assessment and management of risk associated with temporary modifications in support of maintenance activities (in lieu of screening in accordance with 10 CFR 50.59, in accordance with latest revision of NEI 96-07, as endorsed by the latest revision of RG 1.187)
- (8) risk assessment and management associated with risk-informed TS that uses the existing (a)(4) risk assessment process

C.I.17.6.5 Maintenance Rule Training and Qualification

Describe the program for selection, training and qualification of personnel with Maintenance Rule-related responsibilities consistent with the provisions of Section C.I.13 of this guide as applicable. Training should be commensurate with maintenance rule responsibilities, including Maintenance Rule program administration, the expert panel process, operations, engineering, maintenance, licensing, and plant management.

C.I.17.6.6 Maintenance Rule Program Role in Implementation of Reliability Assurance Program (RAP) in the Operations Phase

As discussed in detail above, the applicant should describe the relationship and interface between Maintenance Rule and RAP (See Section C.I.17.4). The NRC has determined that the reliability assurance program may be implemented in the operations phase by (a) the 10 CFR Part 50, Appendix B, QA program, (b) the maintenance and surveillance program, and (c) the Maintenance Rule program. If

the applicant's maintenance rule program is to be used in implementation of RAP, in conjunction with the QA program and the underlying maintenance and surveillance programs, the COL application submittal should describe how the maintenance rule program will ensure that all RAP SSCs (consistent with operational and plant-specific considerations) are included within the Maintenance Rule scope in the HSS category.

C.I.17.6.7 Maintenance Rule Program Implementation

Describe the plan or process for implementing the Maintenance Rule program as described in the COL application, including sequence and milestones for establishing program elements, and commencing monitoring or tracking of the performance and/or condition of SSCs as they become operational. The Maintenance Rule will require that the program be implemented by the time that fuel load is authorized.