SAND2010-1215C

Enabling Objectives

- Explain the purpose of a USQ screen
- Provide lessons learned on preparing USQ screens by going over item-by-item what is asked on the USQ Screening checklist
  - Identify the attributes of a good screen
  - Explain when the screen questions require a USQD be performed
  - Provide an exercise in writing a good screen

Purpose of USQ Screening

- The USQ screen serves to reduce the administrative workload to both Sandia and SSO of identifying and documenting a full USQD, by identifying changes that:
  - meet a set of pre-defined criteria, *agreed to by NNSA/SSO*, that show that the change is either bounded by another USQD or has no impact on safety;
  - are already known to require NNSA/SSO approval;
  - do not have the potential to impact safety systems or processes as defined in the facility safety basis; or
  - do not create new hazards.

Lessons Learned on Preparing USQ screens

- Incorrectly prepared USQ screens are one of the most vulnerable points in USQ process.
  - Changes can be prematurely excluded from the process.

- Lessons Learned added to USQD training to address this concern.

Lessons Learned on Preparing USQ screens

- DOE Guide 424.1-1A, Section 3.2 states,
  - "USQ screening is intended to be a simple go/no-go decision-making step, without evaluative consideration."
    - "Non-evaluative" means that the answer to a screening question is obvious from a simple reading of the safety basis document.

Lessons Learned on Preparing USQ screens

- Never state or imply an evaluation has occurred in a screen.
  - A screen should not be justified by implying it does not yield a positive answer to one of the USQD questions.

USQ Screening Checklist (SF 2001-USC)

SF 2001-USC (6-2009) Supersedes (5-2006) Issue

USQ Screening Checklist

Note: This form is associated with CPR400.1.1.14/GN470080, *Implementing the Unreviewed Safety Question (USQ) Process for Nuclear Facilities*.

USQ Screen No.:

Facility name: Date:

Detailed description of change:

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USQ Screening Checklist (SF 2001-USC)

- USQ Screening Number
  - Assigned by facility USQ Coordinator;
  - When eUSQ system is functional, automatically assigned; and
  - Same number assigned to USQ screens and USQDs.
- Facility Name
  - Separate screening checklist required for each facility affected since facility safety basis differs between facilities

USQ Screening Checklist (SF 2001-USC)

- Detailed Description of Change
  - In conjunction with cited reference material, must be sufficient to judge the potential impact of proposed change on facility safety basis.

- Three groupings of questions
  - **Group I -** Meets a set of pre-defined criteria, agreed to by NNSA/SSO, that show that the change is either bounded by another USQD or has no impact on safety;
  - **Group II -** Are already known to require NNSA/SSO approval; or
  - **Group III -** Does not have the potential to impact safety systems or processes as defined in the facility safety basis nor creates new hazards.

USQ Screening Checklist (SF 2001-USC) - Description

- **What makes a good USQ Screening Checklist description?**
  - **Clear**
    - Easy to understand;
    - Fully and specifically identifies affected systems as identified in the safety basis; and
    - Identifies affected document by their official name and revision.
  - **Complete discussion of**
    - The scope of the change;
    - Background information and assumption(s); and
    - How the change relates to the “big picture.”

USQ Screening Checklist (SF 2001-USC) - Description

- **What makes a good USQ Screening Checklist description?**
  - **Concise**
    - focuses on the safety significance of the change relative to the facility safety basis;
    - use a graded approach (i.e. screens need less detail than a full USQD); and
    - Generally consists of 1-2 paragraphs
      - More than one sentence, but
      - Not multiple pages

USQ Screening Checklist – Examples of Common Problems

- Descriptive information buried in question responses instead of in description section
  - Credited safety function of a piece of equipment included in the answers to questions but not in the description.
- Incomplete or inadequate descriptive information
  - Description consists of only the title of the procedure being evaluated.
- Failure to address interim state
  - If a safety system is taken out of service as part of a maintenance procedure, the time out of service should be evaluated as well as the end state.

USQ Screening Checklist – Examples of Common Problems

- Description written against the non-implemented version of the DSA
  - An as-found condition was discovered against an important-to-safety (ITS) system that had the potential to affect its safety function. A DSA change was in process to remove the ITS designation of the system. Description was written against the un-implemented version of the DSA which allowed the change to be screened.
    - If description was written against the implemented version of the DSA, a different conclusion would have been reached.

Screening Description – Real Example

The DSA for Facility X used the material content of the packages from the Nuclear Materials Control and Accountability Database. Based upon a review of the drawing set associated with these packages, it was determined that additional depleted uranium and other non-radiological material was present above the level identified in the hazard tables of the DSA for chemical toxicity hazards.

- Is this a good description?
- Why? Why not?

Screening Description – How It Could Be Improved

Facility X is used to store packages containing radiological waste. Table 3.1, Hazard Identification, in the Facility X DSA, Revision 0, specifically stated that there is no depleted uranium or other hazardous materials present in the facility. This information was based on data from the Nuclear Materials Control and Accountability Database. Based upon a review of the drawing set associated with these packages, it was determined that there are 7 kgs of depleted uranium and 0.5 kgs of beryllium present in the facility. The addition of 7 kgs of depleted uranium and .5 kgs of beryllium will increase the Material at Risk assumed to be present in Facility X and introduces non-radiological hazards not previously identified in the DSA.

Example of Insufficient Detail

Detailed description of change:

Facility X Operating Procedure (OP·OO3.00) has been created to establish methods for operating and surveying the process ventilation system at Facility X. This OP addresses the actions necessary for calibrating ventilation flow rate indications, differential pressure indications, and fume hood face velocity indications and for performing the HEPA filter bank in-place leak test and penetration test, as well as the quarterly channel functional test. Ventilation Test and Balance information is recorded and compared to previous data to verify proper operation and identify data trends that may indicate equipment degradation.

This procedure is intended to satisfy Section 5.3 of the TSRs, which requires that procedures be established, controlled, implemented, and maintained for activities in support of the TSRs. Performing process ventilation system operations and surveillances in accordance with this procedure and other procedures referenced herein ensures that the applicable Limiting Conditions for Operation (LCOs), Administrative Controls (ACs), and Specific Administrative Controls (SACs) of the Technical Safety Requirements (TSRs) are satisfied.

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USQ Screening Checklist Group I (SF 2001-USC)

Group I: If the answer to any of the questions below is **YES**, the change does **not** require further processing in the USQ process and does **not** require NNSA/SSO approval. The summary at the end of this form needs to be completed with the results of the screening, and signed by the USQ screening preparer and independent reviewer.
If the answer to all of the questions below is **NO**, then the proposed change will require evaluation using the Group II questions in this form. See GN470080, Section 4.2.2.1, "Group I," for detailed guidance

a. Is the change covered by a NNSA/SSO approved categorical exclusion? If the question is answered "Yes," identify the categorical exclusion and the NNSA/SSO approval date. Categorical Exclusion Document Number: _____Approval date:_____	Yes ☐	No ☐
b. Is this change completely enveloped by a previous USQD? If the question is answered "Yes," identify the USQD and the approval date. USQD Number: _____ Approval Date:_____	Yes ☐	No ☐
c. Is this a proposed action that involves the installation of an item that is an **exact replacement** (i.e., same manufacturer, same model number, etc.)?	Yes ☐	No ☐
d. Is this a proposed action or maintenance action that involves the installation or replacement of an item that is on the facility **approved equivalent parts list**? If this question is answered "Yes," identify the supporting engineering evaluation which provides the equivalency determination. Document Number: Document Title:	Yes ☐	No ☐
e. Is this a non-conforming part restored to become compliant with the requirements (i.e., the disposition of the non-conformance report is "reject" or "rework")?	Yes ☐	No ☐
f. Is this a corrective action for a condition that involves a restoration modification (return to original condition), as described in the DSA? If not, the as-found condition must be considered a and a USQD performed.	Yes ☐	No ☐
g. Is this purely an editorial change without any technical change to a procedure or document (not applicable to TSR changes)?	Yes ☐	No ☐

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USQ Screening Checklist Group I (SF 2001-USC)

- Meets a set of pre-defined criteria, agreed to by NNSA/SSO, that show that the change is either bounded by another USQD or has no impact on safety
  - Screening questions used to determine if this criteria is met.
  - If the answer to any of the questions is “yes,” the change does **not** require further processing in the USQ process and does **not** require NNSA/SSO approval.
  - It is the expectation that all screening questions in Group I be answered “yes” or “no.”

USQ Screening Checklist Group I (SF 2001-USC)

- Seven questions used to determine if this criteria is met.
  1. Is the change covered by an approved Cat-X?
  2. Is the change enveloped by a previous USQD?
  3. Does the change involve an exact replacement part?
  4. Does the change involve an approved equivalent part?
  5. Does the change involve a non-conforming part restored to become compliant with the requirements?
  6. Does the change involve a corrective action for a condition that involves a restoration modification?
  7. Is the change purely an editorial change without any technical change to a procedure or document (not applicable to TSR changes)?

Group 1: Question 1 – Approved Categorical Exclusion Exists

- Is the change covered by an approved Categorical Exclusion (Cat-X)?

  From DOE Guide 424-1A, "*A categorical exclusion is an exclusion from the requirements that USQDs be performed on proposed changes to a category of SSCs or procedures as a result of a determination that the category cannot credibly have the capability of creating a* [positive] *USQ if changed. Documentation of proposed categorical exclusions should be submitted to DOE. Categorical exclusions are regarded as part of the contractor's USQ procedure and require DOE approval.*"

  – Currently, there are no SSO-approved Cat-X on record.

If/When an Approved Categorical Exclusion Exists

- Is the change covered by an approved Cat-X?
  - Categorical exclusion must be:
    - approved by NNSA/SSO at the time the screen is prepared;
    - applicable to the specific situation that the screen is being prepared for including
      - Facility;
      - Mode;
      - Type of activity; and
    - must be identified by number on the checklist.

Approved Categorical Exclusion Exists – Example 1

- *A Categorical Exclusion Request was submitted to SSO to allow procedure changes relating to how maintenance was performed on the electrical heating system for Facility A to be screened. The Categorical Exclusion Request has been approved by SSO and a number assigned. A USQ Screening checklist is being prepared for a Facility B maintenance procedure change for the electrical heating system.*
  - Can the Group I question relating to Categorical Exclusions be answered "Yes?"
    - Why or why not?

Approved Categorical Exclusion Exists – Example 2

- *A Categorical Exclusion Request was submitted to SSO to allow procedure changes relating to how maintenance was performed on the electrical heating system for Facility A to be screened. The Categorical Exclusion Request has been approved by SSO and a number assigned. A USQ Screening checklist is being prepared for a Facility A maintenance procedure change for the electrical heating system. Along with this maintenance procedure change is a separate change that modifies the power supply to the electrical heating system.*
  - Can the Group I question relating to Categorical Exclusions be answered "Yes?"
  - Why or why not?

Approved Categorical Exclusion Exists – Example 3

- *A Categorical Exclusion Request was submitted to SSO to allow procedure changes relating to how maintenance was performed on the electrical heating system for Facility A to be screened. The Categorical Exclusion Request has been approved by SSO and a number assigned. A USQ Screening checklist is being prepared for a Facility A maintenance procedure change for the electrical heating system.*
  - Can the Group I question relating to Categorical Exclusions be answered "Yes?"
  - Why or why not?

Group 1: Question 2 - Enveloped by a Previous USQD

- Is the change enveloped by a previous USQD?
  - Enveloping USQD must be approved, applicable to the same facility, and cover exactly the same scope.
    - If subject matter is not exactly enveloped, this may be a good candidate for a categorical exclusion request but cannot be screened based on this question.
  - If enveloping USQD was prepared against a previous version of the safety basis, changes must not have affected the attributes being evaluated.
- Previous USQD must be identified on the screening checklist.

Enveloped by a Previous USQD – Examples 1 and 2

An underground gas line is to be installed outside of both Facilities A and B. A USQD was prepared and approved for Facility A. The results of the USQD were negative.

- Example 1: A screening checklist is being prepared for this same change for Facility B. Facility B is immediately adjacent to Facility A.
  - Is the Facility B change enveloped by the previous USQD?
  - Why or why not?
- Example 2: A screening checklist is being prepared for repair of a small portion of this same gas line and installation of a gas storage tank adjacent to Facility A.
  - Is this change enveloped by the previous USQD?
  - Why or why not?

Group 1: Question 3 - Exact Replacement Part

- Does the change involve an exact replacement part?
- Key word here is **EXACT.**
  - Replacement part must be exactly the same part number, including revision.
  - Replacement part must have exactly the same manufacturer.
  - If any feature of the part has changed, then it is not an exact replacement part.
    - For example, if the manufacturer makes a later revision to the part and/or changes the material, it is not an **EXACT** replacement.

Group 1: Question 4 – Approved Equivalent Part

- Does the change involve an approved equivalent part?
  - To be an approved equivalent part, it must have a documented evaluation by a facility engineer that demonstrates that it meets all the pertinent requirements to its specific application at the facility, including service conditions. From DOE G241.1-1A
  - As part of this evaluation, the facility engineer must consider whether new failure mechanisms are created and whether all safety requirements are met with the proposed part.

- Supporting engineering evaluation must be identified on the checklist.

Approved Equivalent Part – Common Problems

- For some older facilities, the original design basis is not available.
  - It may be difficult to demonstrate that all the pertinent requirements to its specific application at the facility are met since original design basis has been lost.
  - Because of this, new failure mechanisms can be created.
  - There are several examples of new failure mechanisms created in this manner throughout the complex.

Approved Equivalent Part – Common Problems

- A rigorous evaluation must be performed by a qualified and knowledgeable system engineer.
  - Evaluation must be configuration controlled to ensure that future changes do not invalidate key assumptions.

Group 1: Question 5 – Restored Non-Conforming Parts

- Does the change involve a non-conforming part restored to become compliant with the requirements ?
  - Replaced with a conforming part (reject disposition).
  - Restored so that it becomes fully compliant with the requirements (rework disposition).

Restored Non-Conforming Parts

- Question cannot be answered “yes” for the following situations:
  - Use-as-is disposition
    - non-conforming part does not meet all functional requirements but is nonetheless an acceptable part.
  - Repair disposition
    - part ends up not fully compliant with the requirements

Restored Non-Conforming Parts

- Restoration of non-conforming parts must be evaluated from two perspectives:
  - Restoring the part is handled through the USQ process.
  - Interim condition must be evaluated and may need to enter the new information process separately.

Group 1: Question 6 – Restoration Modification

- Does the change involve a corrective action for a condition that involves a restoration modification?
  - Restoration modification is a return to the condition as described in the facility safety basis.
  - Such restorations should include verifications that the existing approved design has been restored.

- Change must be evaluated from two separate perspectives:
  - Restoring to the condition as described in the facility safety basis is handled through the USQD process.
  - Interim condition must be evaluated and may need to enter the new information process separately.

Group 1: Question 7 – Editorial Changes

- Is the change purely editorial in nature without any technical change to a procedure or document?
- Editorial changes include, but are not limited to, correction of the following:
  - section references,
  - typographical or spelling errors other than technical parameters or equipment identifiers.
  - titles or names that are not referenced in the TSRs.
  - formatting errors.
- Adding of clarifying notes that do not modify existing requirements.
- Changing the sequence of steps where no specific sequence was designated in the original document.

Technical Changes

- Technical changes which have the potential to affect safety conclusions including, but not limited to:
  - Number changes that affect technical parameters or equipment identifiers referenced in the facility safety basis;
  - Changing the sequence of steps, if a specific sequence was designated in the original document;
  - Adding, deleting or modifying the purpose or scope of a procedure;
  - Deleting or modifying clarifications, prerequisites, or notes;
  - Changing, deleting, or modifying roles or responsibilities (other than for the purposes of reflecting organization title changes); or
  - Adding, deleting or modifying acceptance criteria, limits, or regulatory items.
  - Other?

- Any changes to the TSR, including the basis, require NNSA/SSO approval and cannot be designated as editorial.

USQ Screening Checklist
Group II Questions (SF 2001-USC)

Group II: If the answer to any of the questions below is **YES**, the proposed change does **not** require further processing in the USQ process, **but** the proposed change must be submitted to NNSA/SSO for approval prior to proceeding with the proposed change. The summary at the end of this form needs to be completed with the results of the screening, and signed by the USQ screening preparer and independent reviewer.

If the answer to all of the questions is **NO**, then the proposed change will require evaluation using the Group III questions in this form. See GN470080, Section 4.2.2.2, "Group II," for guidance

a. Is this change a major modification?	Yes ☐	No ☐
b. Has management decided to submit the proposed change to NNSA/SSO for review and approval?	Yes ☐	No ☐
c. Is this a change to the facility TSR document (includes editorial changes)?	Yes ☐	No ☐

USQ Screening Checklist
Group II Questions (SF 2001-USC)

- Three questions are designed to identify changes that are already known to require NNSA/SSO approval and therefore do not require further processing in the USQ process.
  - Is this change a major modification?
  - Has management decided to submit the proposed change to NNSA/SSO for review and approval?
  - Is this a change to the facility TSR document (includes editorial changes)?

USQ Screening Checklist
Group II Questions (SF 2001-USC)

- Is this change a major modification?
  - DOE-STD-1189, *Integration of Safety into the Design Process*, requires a new safety basis document be developed for major modifications.
  - Sandia Safety Basis Manual provides additional information on handling of major modifications.

Major Modifications

- Avoidance of a USQ issue by breaking a modification down into many “minor modifications” could be considered an intentional failure to implement 10 CFR 830 requirements in good faith.

- The question of when a proposed change to a facility is a major modification (requiring a PDSA) versus a change that can be considered under the USQ requirements and a safety analysis approval has been intentionally left to local (DOE and contractor) determination.

- An important consideration involved is the importance of imposition of the nuclear safety design requirements of DOE O 420.1B, and demonstration of how they will be met.

From DOE G 424.1-1A, “Implementation Guide for Use in Addressing Unreviewed Safety Question Requirements”

USQ Screening Checklist
Group II Questions (SF 2001-USC)

- Has management decided to submit the proposed change to NNSA/SSO for review and approval?
  - If DSA is undergoing a major rework that would require DOE approval then there is no reason to submit changes through the USQ process.

- Is this a change to the facility TSR document (includes editorial changes)?

USQ Screening Checklist
Group III Questions (SF 2001-USC)

Group III: If the answer to any of the questions below is **YES**, then the proposed change needs to be evaluated with a USQD (see Section 4.3 of GN470080). If a Group III question is answered **YES,** with basis provided, then remaining Group III questions do not need to be answered. The summary at the end of this form needs to be completed with the results of the screening, and signed by the USQ screening preparer and independent reviewer.

If the answer to all of the questions is **NO**, then the proposed change does not need to be evaluated any further in the USQ process. **However**, it is expected that an explanation will be provided using this form to justify the questions with **NO** answers. See GN470080, Section 4.2.2.3, “Group III,” for guidance.

a. Is this a temporary or permanent change in the facility as described in the existing documented safety analysis? (see notes in Section 4.2.2.3) Basis for your answers (reference documents reviewed and supporting documentation):	Yes ☐	No ☐
b. Is this a temporary or permanent change in the procedures as explicitly or implicitly described in the existing documented safety analysis? Basis for your answers (reference documents reviewed and supporting documentation):	Yes ☐	No ☐
c. Is this a new activity, such as an operation, test, or experiment **not** described in the existing documented safety analysis? Basis for your answers (reference documents reviewed and supporting documentation):	Yes ☐	No ☐

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USQ Screening Checklist
Group III Questions (SF 2001-USC)

- The following three questions are designed to identify changes that do not have the potential to impact safety systems or processes as defined in the facility safety basis nor create new hazards.
  - Is this a temporary or permanent change in the facility as described in the existing documented safety analysis?
  - Is this a temporary or permanent change in the procedures as explicitly or implicitly described in the existing documented safety analysis?
  - Is this a new activity, such as an operation, test, or experiment **not** described in the existing documented safety analysis?

USQ Screening Checklist
Group III Questions (SF 2001-USC)

- If any of the questions is answered "Yes" with a basis provided, the rest of the questions do not have to be answered since a USQD will be required.
- If all questions are answered in the negative, bases must be provided for all three questions.

USQ Screening Checklist
Group III Questions (SF 2001-USC)

- A frequent problem is that the authors try to answer the USQD questions in part III of the screen.

- If the response to this question is extensive or requires additional analyses, a USQD should be performed.

USQ Screening Checklist
Group III Questions (SF 2001-USC)

- Inappropriate screening of changes not explicitly described in the DSA or performing evaluations within the screen
  - It is inappropriate to screen out a change that involves systems or hazards that are not described in the existing safety analysis. Not all hazards are accurately described in DSAs.
  - If the screening process involves examination of whether or not the issue is dealt with in the DSA, take the nature of answering the seven USQ criteria questions, the item should not be screened out. Instead, a USQD should be completed.
  - Consider whether another entry into the USQ process (PISA, test or experiment not described in the DSA, or the possibility of an accident or failure of a different type) should be invoked.

From DOE G 424.1-1A, "Implementation Guide for Use in Addressing Unreviewed Safety Question Requirements"

Temporary or Permanent Change in the Facility

- Change in the facility includes:
  - Changes that alter or impact a SSC design, function, or method of performance as described in the existing safety analyses. The change may be implicitly rather than explicitly defined in the safety basis documentation.
    - For example, changes to the power supply or supporting system to an SSC may be changes to a facility whether or not they are explicitly described in the DSA.
  - Changes to systems not explicitly described in the DSA that alter the design, function, or method of performing the function of an SSC, as described in the safety analyses.
    - For example, a new connection to a ventilation system may affect the flow capacity of the ventilation system which is credited in the accident analysis.

Temporary or Permanent Change in the Facility

- Changes to an SSC that do not involve equipment important to safety which could initiate an accident or affect the course of an accident.
  - For example, changes to the water supply for the fire suppression system or changes to the sprinkler heads that affect coverage could invalidate assumptions used in the hazard or accident analysis.
- Changes to non-safety SSCs must be considered, as well as safety SSCs, to the extent that they can affect the facility's safety function.
  - Absence of ceiling tiles affected the performance of sprinkler head activation.

Temporary or Permanent Change in the Facility

- If dealing with nonconformances, there are two dispositions that must not be screened out of the USQ process:
  - Use-As-Is disposition in which the nonconforming part is justified as not meeting all functional requirements but is nonetheless an acceptable part.
  - Repair disposition in which the part is made to agree better with requirements for the part (but remains not fully compliant with the requirements).

Temporary or Permanent Change in Procedures

- A procedure can be anything that controls or defines work to be done. Examples of procedures can include the following:
  - Written steps in a classical procedure format;
  - A diagram, flowchart or drawing;
  - A computer program or spreadsheet;
  - A manual used site- or facility-wide that directs work to be performed;
  - A work plan that governs how work is performed in the facility;
  - A work instruction; or
  - Combinations of the above.

- This question should be considered for any activity that changes how work is performed (operation, test, maintenance, surveillance) or how safety management programs are implemented

Temporary or Permanent Change in Procedures

- If the procedure is explicitly described in the facility safety basis, then a USQD is required for the change.

- If the procedure is implicitly described in the facility safety basis (procedures relating to the facility safety management processes, or operating, testing, surveillance and maintenance procedures for equipment identified in the facility safety basis), a USQD is required.

Temporary or Permanent Change in Procedures

- If the work activity is implied or should have been implied by the facility safety basis, then this question should be answered “yes.”
  - A common error is to answer “no” unless the procedure is specifically described.
  - In some cases, screens have been erroneously answered “no” because the explicit title of the procedure is not used in the DSA.
- A frequent problem is that the authors try to answer the USQD questions in part III of the screen. If the response to this question is extensive or requires additional analysis, a USQD should be performed.

New Activity, Operation, Test or Experiment

- New activities could:
  - create new configurations or modes;
  - introduce new material, hazards, or a new dispersal mechanism;
  - create extended outage times or take equipment out of service that were not previously evaluated in the facility safety basis;
  - change the scope of activities previously evaluated; or
  - invalidate assumptions previously made in the DSA.

USQ Screening Checklist

- USQ Screening Checklists and attachments are records and must be maintained.

- From GN470080,
  - *This screening checklist is a part of USQ documentation and must be retained. USQ documents are retained by line organizations in accordance with Sandia CPSR400.2. "Information Management" for at least the operational life of the facility, or until the hazard categorization of the facility falls below Hazard Category 3 per DOE-STD-1027 (decommissioning activities).*

USQ Screening Exercise

- A revision is being made to the Facility X checklist used to document the movement of radioactive material. The checklist is implementing one or more TSR requirements. The revision involves a text change to the following checklist item:

  Checklist Item #12: Surveillance Requirement 4.2.1.2, “Verify by visual inspection that the loading area is free of other hazardous materials”

  to

  Checklist Item #12 : Surveillance Requirement 4.2.1.3, “Verify by visual inspection that the unloading area is free of other hazardous materials”

  Both versions of this checklist item are consistent with the TSR language. Neither surveillance requirement is captured anywhere else in the checklist. No TSR change is required due to this change.

USQ Screening Summary

- Explain the purpose of a USQ screen
- Provide lessons learned on preparing USQ screens by going over item-by-item what is asked on the USQ Screening checklist
  - Identify the attributes of a good screen
  - Explain when the screen questions require a USQD be performed
  - Provide an exercise in writing a good screen