SUMMARY OF RESULTS FROM
MEETING WITH NEI/INDUSTRY
FEBRUARY 22, 2001

1. What unavailable hours should be counted in the SSU?

   a. Should all unavailable hours of a train be counted whenever the function is required, or only when the train is required?

   Both NRC and NEI agreed that unavailable hours during power operation and shutdown should be counted separately. They would then be add together to calculate one overall unavailability number. (The NRC wants shutdown unavailability to eventually become a separate PI, but for now they would be included together.) NRC and NEI agree that, during power operation, unavailable hours would be counted any time a train is taken out of service for any reason when it is required to be in service by the Technical Specifications (T.S.). During shutdown, NEI proposed to count the "primary and first backup equipment for performing a safety function credited in the shutdown management plan." The NRC proposed to count unavailable hours for any train of a system whose function is required. While the NRC proposal would count all trains in systems with more than two trains and the NEI proposal would not, the NEI proposal seems to be acceptable and proper. However, we need to ensure that we are counting two trains of the same system (as opposed to HPCI and one train each of ADS and LPCI or core spray), and

   b. Should on-line maintenance be excluded from the SSU if the licensee has a risk analysis that show that the increase in risk is small?

   Both NRC and NEI agree that on-line maintenance (and off-line maintenance whenever the system function is required by T.S.) should be counted.

   c. Should support system unavailable hours be counted as monitored system unavailable hours?

   The NRC and NEI agree that, as long as support systems are not monitored in the SSU, support system unavailable hours should be cascaded to the monitored systems. (A corollary to this is that support systems be counted as available if they have any train available, i.e., support systems are not required to be single failure proof.)

   d. Should unavailable hours due to design deficiencies be excluded from the SSU PI?

   Both NRC and NEI agree that long-standing design deficiencies should not be included in the SSU. We are considering including design deficiencies that occur within the 12 month period of the current calculation.

2. How should demand and run failures should be handled in the SSU.?

Attachment 3

Due to personnel illnesses and training, the NRC work on this item was incomplete at the time of the meeting. NEI proposed that, in situations where the time of occurrence of a failure is indeterminate, unavailable hours be counted only from the time of discovery and a demand failure be assumed and evaluated through the Significance Determination Process (NEI did not distinguish between demand failures and discovered conditions). This item is still open.

3. What credit for operator action is appropriate in the SSU.?

   a. Should the SSU allow credit for operator actions that are virtually certain to be successful?

   b. Should credit allowed for more complicated recovery actions?

   c. If credit for more complicated recovery actions is allowed what conditions should be applied to such actions?

   Both NRC and NEI agree that the current allowances for operator recovery action should be retained with no changes or additions, but that plant-specific exceptions could be made for special circumstances.

4. Should default values for hours a train is required be allowed?

   NEI proposes to allow the use of default values for the hours a train is required because of the burden on licensees to collect the actual data. The NRC has data that show the calculated SSU value can be significantly lower in certain situations when the default hours are used. The NRC will look at the possibility of providing guidelines for licensees on when the use of default h ours is acceptable and when it is not.