

- ① DISCUSS TWO SEPARATED AND DISTINCTLY DIFFERENT RISK ASSESSMENT
 - FIRST ACTUAL CCDP FOR EVENT (LOW RISK)
 - SECOND THE RISK ASSOCIATED WITH NOT IDENTIFYING DEGRADED TUBES DURING THE 1997 SGTUBE INSPECTION. SDP RISK ASSESSMENT (HIGH RISK)

RISK SIGNIFICANCE

Actual Event Risk:

- Initial estimated CCDP for a SGTR ~ 1E-4
GEM/SPAR & ~7.7E-5 based IPE CDF CONTRIBUTION SGTR = $\frac{1E-6}{1.3E-2}$
- Revised CCDP based on actual leak rate was ~ 2.2E-6
 - BASED ON LICENSEE ANALYSIS
 - Risk Significance was low

← BASIS FOR AIT

Key Assumptions:

- Actual SGT failure leak rate ~ 100gpm - HRA revised accordingly ← HUMAN RELIABILITY ANALYSIS
- Operator actions are significant contributor to SGTR CDF contribution
- Charging pumps available for HP makeup - For larger SGTR flow rates CP are not adequate (98GPM)

ROP IS ONGOING & FINAL DETERMINATION IS STILL PENDING.

SDP Conditional Risk Assessment: - ΔCDF ANALYSIS PERFORMED BY NRR PRAB.

- Delta-CDF is used to determine risk significance of inspection findings IAW IMC 0609
- Deficiencies with the 1997 SGT inspection program have a high delta-CDF and are risk significant / LERF

Key Assumptions:

- SGT failure IE frequency ~ 1/R_Y
- 1/2 tube failures result in ruptures
- IAW IMC 0609 ΔCDF ~ ΔLERF (most LERF IS SECONDARY RELIEF VALVE STICKUP OPEN)
- Analysis also included induced SGTRs From MSL Breaks & Primary overpressure events such as ATWS.

C/17