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Likelihood and Reliability

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Attachment 3

Purpose



• Provide general response to RAI likelihood and reliability questions

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Likelihood and Reliability

Background

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- 10CFR70 requires applicant to define likelihood categories
- SRP allows applicant to define likelihood categories qualitatively or quantitatively
- 10CFR70 describes likelihood requirements as a function of the consequence to the dose receptor

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Background -10CFR70.61 Performance Criteria

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Background - Summary of CAR Analysis Methodology

- Performed hazard assessment to identify potential events
- Assumed unmitigated likelihood of not unlikely, equivalent to event occurs
- Determined unmitigated consequences
- If potential unmitigated consequences could exceed low consequence criteria, principle SSCS assigned (IROFS) to prevent or mitigate the event

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Background - Summary of CAR Analysis Methodology

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- Method requires failure of prevention or mitigation controls to be highly unlikely
- Very conservative in that it does not credit initiator, additional protection features, or IROFS-Defense in Depth Features

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Background - Highly Unlikely Definition in CAR

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- Events originally classified as Not Unlikely or Unlikely to which sufficient principle SSCs are applied to further reduce their likelihood to an acceptable level
- Also committed to
 - Application of single failure criteria or double contingency principle (includes redundancy/diversity, independence, failsafe)
 - 10CFR50 Appendix B, NQA-1 QA program
 - Specific codes and standards
 - Management Measures

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Summary of RAI Likelihood Comments

- Explain how the application of the single failure criteria or double contingency principle meets the performance criteria of 10CFR70.61
- Provide quantification of IROFS reliability or provide IROFS reliability targets

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Response to First Comment

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- Single Failure Criteria by itself may require rigorous • reliability analysis to demonstrate Highly Unlikely Criteria is met
- However, Highly Unlikely Criteria is easily met with the ۲ application of the following:
 - Single Failure Criteria or double contingency principle
 - Management measures including IROFS Surveillance (IROFS failure detection and Repair or Process Shutdown)
 - 10CFR50 App B, NQA-1 QA Program such vens are generally reliable to < 10⁻²
 Industry Codes and Standards
 - Industry Codes and Standards

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Approximate Failure Frequency for Model 3 (per year)

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--IROFS Surveillance Time--

IROFS		per	per	per	no pur veillance
<u>Rel #</u>	<u>continuous</u>	<u>shift</u>	week	<u>month</u>	none
0.1	apprx. 0	2E-5	4E-4	2E-3	2E-2
0.01	apprx. 0	2E-7	4E-6	2E-5	2E-4
0.001	apprx. 0	2E-9	4 E-8	2E-7	2E-6
	• ·		- inheren - PCS will	t assumption of "	repair rate" repair rate" is Winifing

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Conclusion



Results indicate that DCS commitments produce likelihood values that are equal to or lower than those provided in the SRP, thus satisfy the definition of highly unlikely

- Single Failure Criteria or double contingency principle
- Management measures including IROFS Surveillance (IROFS failure detection and Repair or Process Shutdown)
- 10CFR50 App B, NQA-1 QA Program
- Industry Codes and Standards

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Second Question

• Provide quantification of IROFS reliability or provide IROFS reliability targets

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Response to Second Question

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- The previous slides have shown that the overall system failure rate is a function of more than just reliability
- The previous slides have shown that acceptable system failure rates - or targets - are provided by committing to the following:
 - Single Failure Criteria or double contingency principle
 - Management measures including IROFS Surveillance (IROFS failure detection and Repair or Process Shutdown)
 - 10CFR50 App B, NQA-1 QA Program
 - Industry Codes and Standards

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Response to Second Question (con't)

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- The ISA will provide sufficient information to provide reasonable assurance that these targets are met through:
 - detailed IROFS description
 - demonstration of single failure criteria
 - description of surveillance method
- Additionally, this method is consistent with SRP guidance as described on the following pages

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- SRP guidance allows qualitative definition, and semi qualitative methods, and evaluation
- Information provided in CAR and to be provided in ISA is consistent with SRP guidance

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Discussion of SRP Guidance

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- SRP Qualitative definition is acceptable if:
 - reasonably clear and based on objective criteria
 - can distinguish between Highly Unlikely and Unlikely Events
- CAR -
 - objective criteria provided
 - did not use unlikely category

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Discussion of SRP Guidance

• SRP - Qualitative definition of highly unlikely is acceptable if it incorporates availability and reliability qualities to an appropriate degree

- commitment to double contingency principle

• CAR -

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> provides commitments including a commitment to the double contingency principle

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Discussion of SRP Guidance

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- SRP Qualitative method is acceptable if IROFS characteristics are described:
 - safety margins, type of control, management measures, surveillance measures, failure modes, demand rate, failure rate, defense in depth features, degree of redundancy, degree of independence, diversity, and vulnerability to common cause
- ISA-
 - will provide similar information

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Conclusion Related to Second Question

• Likelihood targets are provided in the CAR through identified commitments

- Qualitative methods are consistent with the SRP
- Thus, additional quantitative likelihood or reliability targets and/or values are not necessary

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Summary of MFFF Likelihood Strategy

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- CAR provide commitments to:
 - single failure or double contingency
 - 10CFR50 Part B, NQA-1 QA program
 - codes and standards
 - Management measures including IROFS surveillance
- ISA demonstrates commitments are met:
 - identify IROFS
 - demonstrate double contingency/single failure satisfied
 - describe IROFS surveillance methods

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