



RISK INFORMED TECH SPECS

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Enclosure 5



General Overview of Initiative 5

- Relocation of Surveillance Test Intervals
- Discuss Process Flow Chart Key Element
- Discuss TS Program Section
- Next Actions

Relocation of Surveillance Test Intervals

- Relocation of STI to Licensee Controlled Program
- LCOs that are for SSC
- Establish TS Section 5.5 Program Requirement
- Establish Standard Process for Implementation
- Obtain NRC endorsement of Process



Process Flow Chart

Key Elements

- Comprehensive Treatment
- Uses established RI approach for Safety Significance
- Treats HSSC with more rigor
- Uses Expert Panel to augment PSA
- Establishes feedback and monitoring to assess current and future STI changes



TS Program Section

- Provides for a STI Control Program Requirement
- Administrative controls and reviews
- Licensees may make changes if the change does not change TS or Bases that currently requires NRC Approval under 50.59



STI Control Program

- Control Program key elements include:
 - Use of approved methods for HSSC
 - ◆ GL 91-04, RI-IST, Intermediate Step, etc.
 - Expert Panel for LSSC
 - Parameter STIs extension methods
 - Monitoring and feedback of interval changes



STI Control Program

- assesses the applicability of a failure or nonconforming condition to other components in RI surveillance program
- ensure PSA accounts for change in reliability



Next Actions

- NRC Feedback on Draft approach
- Incorporate NRC feedback
- Submit TSTF with example STI

Proposed Process for Initiative 4b

Introduction: Under the current regulations, when plant equipment is taken out of service both Technical Specification (TS) and Maintenance Rule (MR) requirements must be evaluated and complied with. These two separate requirements can result in inconsistent results and required actions.

Objective: NEI proposes to modify Technical Specifications in order to make these two requirements more consistent.

Proposed AOT Extension Process:

The current TS AOT requirements will be retained, but the TS will be modified to allow each licensee to perform a plant specific risk evaluation in accordance with MR (a)(4) requirements which could extend the original AOT, if warranted. This evaluation would consider equipment within the scope of (a)(4).

If the current AOT is expected to be exceeded, then the licensee will have the option of determining a configuration-specific AOT. The configuration specific AOT would be determined by performing a risk assessment in accordance with MR (a)(4) requirements and comparing the results to established acceptance criteria. In order to address concerns involving PSA quality, uncertainties, assumptions, and modeling techniques, a TS not-to-exceed value for each AOT would be provided. This value would be referred to as the "backstop AOT", which could never be exceeded regardless of the risk evaluation results. The backstop AOT value would be based on the following requirements:

1. Provide consistency with risk insights
2. Allow a reasonable time to effect repairs.
3. Require return to original design basis within a reasonable time period.
4. Prevent AOT conditions from existing indefinitely.

The following criteria and actions are recommended in order to be consistent with MR (a)(4) requirements:

1. $ICDP < 1E-6$ ($ILERP < 1E-7$): No compensatory measures required. AOT can be extended based on the risk assessment for up to the backstop AOT.
2. $ICDP < 1E-5$ ($ILERP < 1E-6$): Compensatory measures required. With these measures in place AOT can be extended for up to the back-stop AOT.
3. $ICDP > 1E-5$ ($ILERP > 1E-6$): Compensatory measures required which will reduce $ICDP < 1E-5$ ($ILERP < 1E-6$). Risk evaluation can be qualitative or quantitative. The configuration can only be entered with management approval. With these measures in place AOT can be extended for up to the back-stop AOT.

4. If the above risk guidelines are not met, then the required actions and completion times of the existing AOT(s) must be entered.
5. If emergent work arises, or the risk profile changes with other systems becoming unavailable, risk must be promptly re-evaluated. If above values change, the resultant new risk guideline must be complied with.

Conclusion:

This proposed change to TS provides a risk informed approach by retaining the current TS AOTs, while allowing a risk evaluation to extend the AOTs. The risk evaluation can never allow an extension past an established backstop AOT and the risk evaluation must be promptly re-evaluated if plant configuration changes. This proposed change allows additional licensee flexibility without compromising plant safety and makes TS and MR (a) 4 requirements more consistent.