

**License Renewal Meeting
Scoping of SBO Equipment for License Renewal
Agenda**

**February 14, 2002
(1:00-4:00 PM)**

Welcome and Introductions	5 minutes
Opening Remarks - NRC/NEI	10 minutes
NEI's Comments on NRC Position	50 minutes
NRC's Comments on NEI Position	50 minutes
Follow Up Actions	40 minutes
Summary	10 minutes

**Industry Discussion on Proposed Staff
Guidance on Scoping of Equipment Relied
on to Meet Station Blackout Rule**

February 14, 2002



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Proposed Staff Position:

- *“Consistent with the requirements specified in 10 CFR 54.4(a)(3) and 10 CFR 50.63(a)(1), the plant system portion of the offsite power system should be included within the scope of license renewal. Based on precedent set in maintenance rule guidance (NRC Regulatory Guide 1.160), the switchyard should be considered for inclusion in this scope”.*



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Scoping Guidance

- The license renewal rule, section 10 CFR 54.4(a)(3) , requires that, “all systems, structures, and components relied on in safety analyses or plant evaluations to perform a function that demonstrates compliance with ...10 CFR 50.63” be included within the scope of license renewal
- Guidance was provided to limit the potential for unnecessary expansion of the review for the scoping category
 - Guidance contained in Statements of Consideration for LR rule and in NRC resolution of LR Issue No. 98-0082
 - Focuses scope review on current licensing basis for plants



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Scoping Guidance

- To establish whether plant offsite power systems should be included within the scope of license renewal, two questions must be answered:
 - Were plant offsite power systems, structures or components relied on in safety analyses or plant evaluations to perform a function that demonstrates compliance with 10 CFR 50.63?
 - If so, is the reliance reflected in the plant's current licensing bases?
- The response to both questions must be “yes” to include plant offsite power systems with LR rule scope
- These questions can not be answered generically and must be addressed on a plant-specific basis



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Determination of Acceptable Coping Duration

- Plant-specific coping durations were determined, for most plants, following guidance contained in Reg Guide 1.155
- The guidance identified factors found to significantly affect the risk from station blackout
 - Plant emergency ac power configuration
 - EDG reliability
 - Offsite power design characteristics
- These factors incorporated industry data on the frequency of loss of offsite power and the probable time needed to recover offsite power
- The use of these factors does not constitute a reliance on any plant-specific elements or components of the offsite power system

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NEI

Procedures and Training

- The SBO rule requires that plants have the capability to withstand for a specified duration and recover from a station blackout
- The SBO rule does not exclusively direct or rely on restoration of offsite power as the means to recover from a station blackout
- The SBO rule calls for development of and training on plant procedures to restore ac power
 - Plant-specific procedures include all possible sources of ac power (both onsite and offsite)
- Incorporation of steps necessary to restore offsite power in plant procedures does not constitute a plant-specific reliance on restoration of offsite power

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NEI

Alternate AC Power Sources

- The SBO rule focuses on the role alternate AC power sources play in coping with a SBO
- Alternate AC power sources do, however, provide one of several sources of AC power
 - Plant-specific procedures include alternate ac power sources as a means of recovering ac power
 - NUREG-1032 recognizes power restoration following an SBO using alternate AC power sources
 - NUMARC 87-00 specifically notes: "The event ends when AC power is restored to shutdown busses from any source, including Alternate AC".

NEI

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Summary

- It is incumbent on each applicant for license renewal to confirm for their plant the level of reliance placed on the restoration of offsite power to demonstrate compliance with 10 CFR 50.63
- NRC scoping guidance focuses the review on the plant-specific CLB
- The CLBs for most, if not all, plants do not rely on offsite power systems to demonstrate compliance with the SBO rule

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