**From:** Lawrence Burkhart
**To:** Allen Hiser; Jack Strosnider; Richard Barrett; Suzanne Black } NRR
**Date:** 11/29/01 6:59PM
**Subject:** COMMISSIONERS' TAS BRIEF ON FRIDAY

A brief for the Commissioners' TAs is being arranged for tomorrow, Friday, 11/30/01, afternoon (either 1 p.m. or 2:30 p.m.) to discuss the status of the staff's review of the D-B Bulletin 2001-01 response.

I suggest we conduct the brief similar to the EDO brief of today (I will cover intro and licensee's proposed changes to inspection plans, Rich B. (SPSB) to cover risk info and numbers, and Jack to cover 5 safety principles).

I have attached the slides (Corel presentations file).

I need the following input from SPSB:

(1) wording from RG 1.174 re: stated guidelines, and
(2) the baseline CDF (not including external events)

Thanks.

Larry.

**CC:** Andrea Lee; Bill Bateman; F. Mark Reinhart; Farouk Eltawila; Gary Holahan; Jacob Zimmerman; Jin Chung; John Zwolinski; Jon Johnson; Keith Wichman; Samuel Collins; Stacey Rosenberg; Steven Long

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# STATUS OF NRC STAFF REVIEW

## OF FENOC'S BULLETIN 2001-01 RESPONSE FOR DAVIS-BESSE

- Brief for Commissioners' TAs
- November 30, 2001

# AGENDA FOR DISCUSSION

- Purpose

  - To discuss the results of the staff's ongoing assessment of FENOC's responses to Bulletin 2001-01 for Davis-Besse
  - To discuss the change in the staff's decision regarding issuance of an Order

- Success

  - Commissioners' TAs understands the basis for the staff's decisions regarding responses to Bulletin 2001-01 for Davis-Besse

- Introduction and discussion of changes - Larry Burkhart (5 minutes)

- Discussion of status of staff's review - Jack Strosnider and Rich

# CHANGE IN LICENSEE'S PLANS/COMMITMENTS

- The Licensee proposed changing its commitments to include

☐ Commencing its refueling outage on February 16, 2001, vice March 31, 2001,

☐ Perform a qualified visual inspection of 100% of the VHP nozzles and undertaking NDE
of those nozzles that have indications of cracking,

☐ Characterizing any cracks that are identified in VHP nozzles,

☐ Operating at a reduced RCS hot leg temperature to minimize the head temperature
effects on crack initiation and growth, and

☐ Maximizing the availability of the plant s redundant critical safety systems until shutdown
(this may result in decreases in nominal CDF).

# RISK ASSESSMENTS

| | Median* (w/ inspection) | Median* (w/o Inspection) | 95 Percentile* (w/o Inspections) | |
|---|---|---|---|---|
| Baseline CDF (/ry) | 6.6E-05 | 6.6E-05 | 6.6E-05 | |
| IE Freq. (/ry) | 4E-04 | 4E-03 | 4E-02 | NRC |
| | | | 4.8E-02 | FENOC |
| CCDP (/ry) | 2.7E-03 | 2.7E-03 | 2.7E-03 | |
| Delta CDF (/ry) | 1.1E-06 | 1.1E-05 | 1.1E-04 | NRC |
| | | | 1.3E-04 | FENOC |
| CDF with comp measures (/ry)** | 9E-07 | 9E-06 | 9.0E-05 | NRC |
| | | | 1.0E-04 | FENOC |
| LERF (/ry) | <1E-08 | <1E-08 | 1.4E-06 | NRC |
| | | | 1.5E-07 | FENOC |
| Incremental CDP for 75 days*** | 1.4E-07 | 2.2E-05 | 1.8E-05 | NRC |
| | | | 2.1E-05 | FENOC |

*Refers to susceptibility of nozzle material to OD-initiated PWSCC cracking

**Reduction of 20% assumed for compensatory actions

***Assumes 75 days of operation from today until February 16, 2001

# RISK-INFORMED DECISIONMAKING GUIDELINES

- RG 1.174
  - Intended for licensing basis changes (long-duration or permanent changes)
    - ΔCDF less than 1E-06/ry
    - ΔCDF between 1E-06/ry and 1E-05/ry
    - ΔCDF>1E-05/ry are not normally permitted
- RG 1.182
  - Intended for managing risk associated with maintenance activities (short-duration or transitional changes)
    - ICDP<1E-06 and ILERP 1E-07: normal work controls apply
    - ICP between 1E-06 and 1E-05 or ILERP between 1E-07 and 1E-08
      - Assess non-quantifiable factors
      - Establish risk management actions

# RG 1.174 SAFETY PRINCIPLES

- Current Regulations are met
  - It is likely that, if inspections were performed today, current regulations would not be met with respect to TS requirements and GDC
- Defense-in-depth philosophy is maintained
  - It is likely that one of 3 barriers is degraded
  - However, Davis-Besse has a large, dry containment (conditional LERP is 1.5E-03)
- Sufficient safety margins are maintained
  - It is likely that safety margins are reduced
- Only a small increase in CDF results
  - Incremental ΔCDF (no comp measures) is 1.1E-06/ry to 1.3E-04/ry
  - Baseline CDF is xE- 05/ry (not including external events)
- The basis of risk measurement is monitored using performance measurement strategies