

Revision of NEI 99-03 Control Room Habitability Assessments Guidance



How did we arrive?

- NRC-Industry Workshop 1998
- Formation of NEI CRH Task Force
- Development of NEI 99-03
- NRC decision to develop draft regulatory guides and GL
 - Significant public comment
- NRC regional meetings with industry
- NEI letter to NRC on revising NEI 99-03



What's the problem?

- CR inleakage tests indicate that unfiltered inleakage value greater than assumed in analysis
 - NRC holds CR amendments until unfiltered inleakage values confirmed
- Standardized TS basis document for pressurized CR states that ΔP purpose is to verify assumed inleakage rates
 - Questions exist if this TS needs to be revised



What's the problem?

- Draft regulatory guides exceed CLB
 - Level of prescriptivness
 - DBAs to be analyzed
- Opinion about what constitutes an integrated inleakage test methodology
- Definition of an acceptable management program
- Sources of smoke to be managed qualitatively

Why proposed NEI 99-03 revision?

- Additional insights about what guidance would be acceptable to the NRC staff
- Additional insights about how inability to satisfy guidance would be addressed by NRC
- Belief that licensees would be more willing to implement a revised NEI 99-03
 - Expectation that NRC is receptive
 - Acceptable schedule exists to revise guidance



Technical Specifications

- Work with the Technical Specification Task Force (TSTF) to develop an appropriate administrative CRH TS
 - Schedule consistent with issuance of a revised NEI 99-03 Licensees needing to modify their technical specifications (TS)



Options Proposed to TSTF

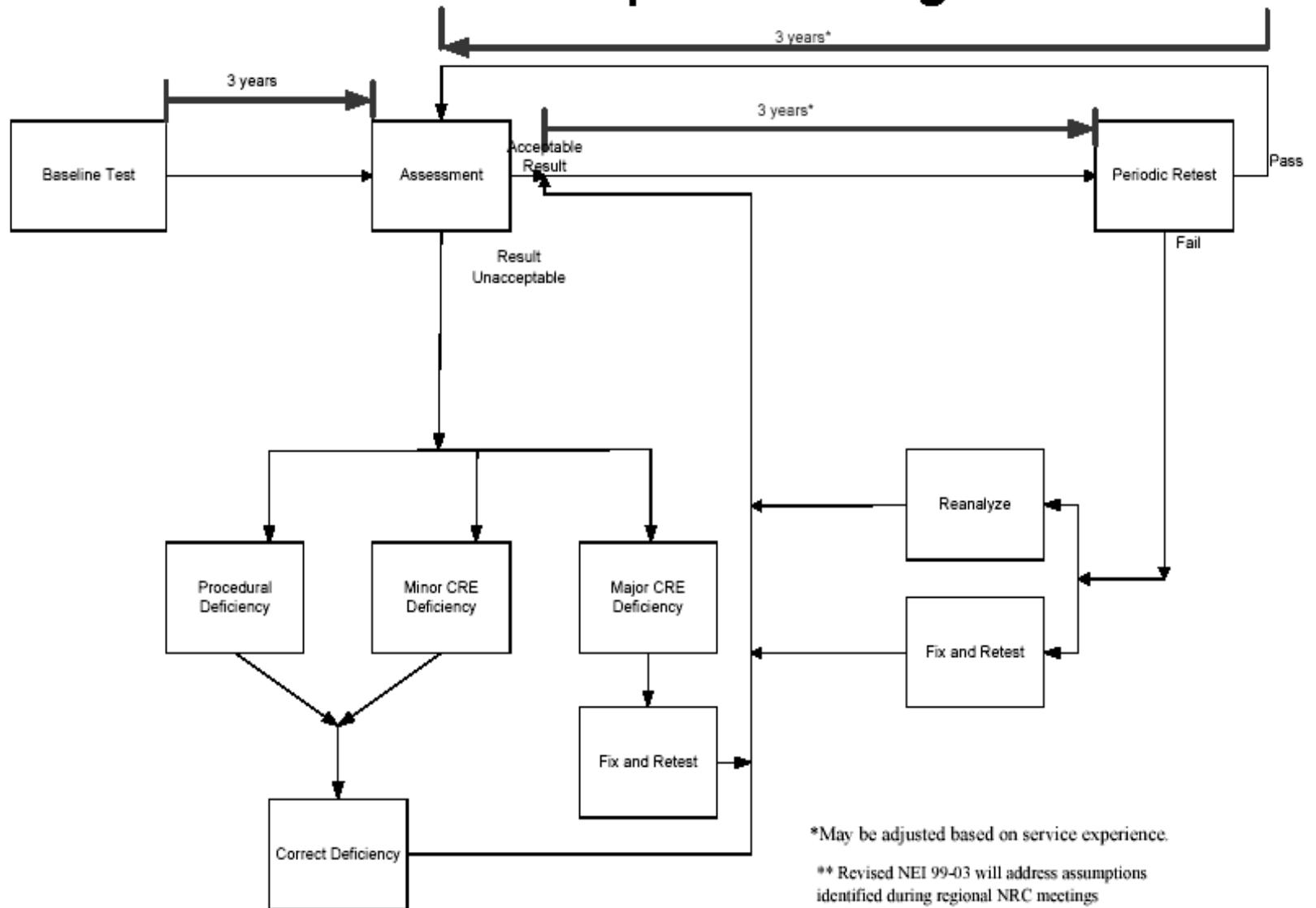
- Adopt an administrative TS, Section 5 of the Standardized TS, to periodically retest the control room for inleakage.
 - ◆ Revised NEI 99-03 guidance would recommend test frequencies and acceptance criteria
 - ◆ Acceptance criteria tied to GDC 19 compliance
 - ◆ Licensee controlled program to identify a specific control room inleakage value

All Licensees -- Program

- Implement a program to periodically retest for control inleakage



CRH Inspection Program**



*May be adjusted based on service experience.

** Revised NEI 99-03 will address assumptions identified during regional NRC meetings

What Would Change - Smoke

- Assure that the plant can be safely shutdown from either the control room or alternate shutdown panel during an internal or external smoke event
 - Qualitative assessment



What Would Change - Analysis

- Clarify that CLB may be used
 - Must assess all design basis accidents in CLB
- Licensees may use the guidance in DG-1111 in conjunction with CLB, DG-1113, or Regulatory Guide 1.183

What Would Change - Analysis

- If using guidance prescribed in DG-1113 or Regulatory Guide 1.183
 - Must assess all design basis accidents applicable to their plant
- If the design is not compatible with the adoption of certain elements of DG-1113 or Regulatory Guide 1.183 guidance
 - Plant specific discussion with NRC staff to identify acceptable alternative approaches

What Would Change – Test Methods

- ASTM E741 provides an acceptable methodology for inleakage testing
- Use of alternate test methodologies will be acceptable for determining baseline and periodic control room inleakage
 - Need to be correlated to the ASTM E741 test
 - ◆ Benchmarking of plants with the same design CR to one that was correlated is acceptable to NRC
 - Use of an alternate test methodology not correlated to the ASTM E741 will be evaluated by the NRC on a plant specific basis.
 - ◆ Benchmarking of other plants can be successfully developed



What Would Change – Test Methods

- Add more definitive criteria for alternative control room inleakage tests methodologies
 - Component Test method and
 - Provide correlation criteria between test methodologies.
- Additional guidance for the performance of self assessments



What Would Change – Additional

- Draft regulatory guides and the public comments will be reviewed to determine additional changes that should be incorporated
 - Need to obtain all public comments



What else is needed?

- The revised NEI 99-03 resolves the NRC key concerns
 - Potential confusion is created by duplicate guidance
 - NEI recommends not issuing DG-1114 and DG-1115
 - NEI recommends issuing a RIS in lieu of the GL



What else is needed?

- The technical content of DG-1111 and DG-1113 is useful to management of CRH
 - Two approaches exist to retain the technical content of the regulatory guides
 - ◆ Wait for publication of the final version of DG-1111 and DG 1113,
 - Subsequently referenced in the revised NEI 99-03, or
 - ◆ To add the technical content of these regulatory guides into the revised NEI 99-03.



Further Recommended Actions

- Technical comments on DG-1111 and 1113 warrant additional discussions



Schedule

ID	Task Name	Duration	Start	Timeline																			
				Jug '02				Sep '02				Oct '02				Nov '02				Dec '02			
				8/4	8/11	8/18	8/25	9/1	9/8	9/15	9/22	9/29	10/6	10/13	10/20	10/27	11/3	11/10	11/17	11/24	12/1	12/8	12/15
1	Write NRC to notify of plan and request meeting	0 days	Mon 8/19/02	■																			
2	Select team meet to prepare for NRC meeting and to redraft NE	1 day	Mon 9/9/02		▣																		
3	Meet with NRC to discuss plan and schedule	1 day	Tue 9/10/02			▣																	
4	Obtain all public comments	0 days	Tue 9/10/02			■																	
5	Redraft of NEI 99-03	12 days	Wed 9/11/02				▣																
6	TF and APC review and comment on Rev. 1	10 days	Fri 9/27/02					▣															
7	Review and incorporation of TF and APC comments	5 days	Fri 10/11/02						▣														
8	Provide NRC Rev. 1	0 days	Fri 10/18/02							■													
9	NRC review and comment on Rev. 1	10 days	Fri 10/18/02								▣												
10	NRC formal feedback on Rev. 1 to NEI	0 days	Thu 10/31/02									■											
11	TF disposition of NRC formal comments on	5 days	Fri 11/1/02										▣										
12	TF meeting with NRC to review Rev. 1	1 day	Wed 11/13/02											▣									
13	APC review of final NEI 99-03, if needed	8 days	Thu 11/14/02												▣								
14	Disposition APC comments, if needed	3 days	Tue 11/26/02													▣							
15	Issue Rev. 1 to industry and NRC	0 days	Wed 12/4/02														■						



Expectations

- NRC concurrence with recommended actions
 - Formal comments on any exceptions
 - NRC staff agreement to perform review and to provide written comments
 - Support of schedule
- NRC staff to meet with CRH Task Force to discuss non-policy technical issues

