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NRC's PROPOSED RESPONSES TO FAQs

27.3 (LaSalle): Yes. This PI and its thresholds are based upon NUREG/CR-5750, "Rates of Initiating Events at U.S. Nuclear Power Plants: 1987 - 1985." The NUREG provides initiating event frequencies used in many applications within the NRC. It is the official agency position on classification of initiating events. For the purposes of the study, the authors considered a turbine-driven pump to not be easily recoverable after the turbine has tripped. (A motor-driven pump is considered to be easily recoverable.) They based this determination upon the same criteria as those that apply to recovery from an equipment malfunction or an operating error described on page 31, lines 8 through 16, of NEI 99-02. That is, the actions must be (1) prompt, (2) completed from the control room, (3) uncomplicated, and (4) virtually certain of success.

28.2 (Point Beach): No. Although the diesel had successfully completed the required run time portion of the surveillance test, the plant was still receiving information from the test during the diesel shutdown. T/2 fault exposure hours should be taken from the last successful monthly test of the diesel.

28.3 (Perry): Yes. See the response to FAQ 27.3. In addition, the confusion regarding the status of the motor-driven feed pump prevented that pump from being easily recoverable as described in the response to FAQ 27.3.

28.5 (Prairie Island): It depends on the quantitative risk assessment that was performed to justify the exclusion. If the assessment specifically addressed the use of the Technical Specification AOT twice per operating cycle, then both overhauls may be excluded from the PI. If, however, the assessment assumed that only one AOT would be used per operating cycle, or if a licensee submitted a request to the NRC for an extended AOT and did not specify the number of times the AOT would be used per cycle, then the exemption may be used only once.

29.8 (Salem): [Add to the end of the proposed response] Therefore both an unplanned power change and an unplanned scram should be counted.

29.10 (Salem): [Add at the beginning of the proposed response] Whenever a licensee and the resident inspectors cannot agree on the proper reporting of a PI, the licensee is obligated to submit an FAQ per the guidance in NEI 99-02. In the third sentence of the proposed response, change "the licensee has a reasonable expectation that" to "the licensee is confident that." Delete last sentence in proposed response.

30.4 (St. Lucie): Yes. When problems are discovered that are due to a licensee performance deficiency, and resolution of that problem results in additional hours beyond those scheduled

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for the overhaul, the additional hours must be counted. In this case, the licensee's RT examination of the lube oil cooler to determine its susceptibility to failure during the planned hydrostatic test was *faulty*. That examination led them to erroneously conclude that their cooler was of a more robust design than it actually was and that it was not susceptible to failure. The licensee acknowledged that, had they accurately determined the type of cooler they had, they would have pre-staged a new replacement cooler. That deficiency resulted in an extension to the planned overhaul to procure and install another cooler.

30.5 (St. Lucie): Yes. When problems are discovered that are due to a licensee performance deficiency, and resolution of that problem results in additional hours beyond those scheduled for the overhaul, the additional hours must be counted. In this case, the fuel oil priming pump was improperly assembled and installed. Although it was capable of providing marginal flow, its performance was so degraded that its future performance capability could not be assured. There was no question in the licensee's mind that the pump needed to be repaired before the EDG could be returned to service. This rework caused an extension to the planned EDG overhaul.

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