

DRAFT**NRC's PROPOSED RESPONSES TO FAQs**

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 licensee's assessment assumed that only one AOT would be used per operating cycle, or if the 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. However, the licensee has the option to perform a risk analysis that assumes the use of two AOTs per cycle. If that analysis meets the requirements of NEI 99-02, Rev. 2, page 28, line 15, through page 29, line 2.

30.2 (Surry): *Question 1.* No. A review of the restoration actions specified in the licensee's surveillance procedure was performed to determine if the restoration actions were uncomplicated (a single or a few simple actions) and not requiring diagnosis or repair as discussed in NEI 99-02, revision 2. Although some of the individual restoration actions met the above criteria, the procedure involved eight or more actions, two of which did not meet the above criteria. Specifically, the two actions involve the diagnosis and reaction to particular plant parameters. For an approximate three minute period, while loads are sequenced onto the emergency bus, engine speed must be adjusted to maintain bus frequency and bus voltage must be adjusted to maintain voltage within specified limits. Therefore, unavailability hours should be counted during the testing of the dedicated EDGs.

Question 2. No. The answer to question 1 also applies to the swing EDG. The restoration actions for the swing EDG are further complicated by the potential need to remove the EDG from one unit's emergency bus, traverse to the opposite side of the control room and subsequently place the swing EDG onto that unit's emergency bus. These additional restoration actions, coupled with the restoration actions required for the dedicated EDGs, exceed those actions constituting a single or a few simple actions. Therefore, unavailability hours should be counted during the testing of the swing EDG.

30.6 (Indian Point 2): If failure of the source range detector high flux trip circuitry is reportable per 10 CFR 50.73 (a)(2)(v), then this counts as a Safety System Functional Failure. Such a determination is outside the scope of the ROP; the issue must be referred to appropriate branch of the NRC.