



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
611 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TEXAS 76011-4005

JUL - 2 2003

Paul D. Hinnenkamp  
Vice President - Operations  
River Bend Station  
Entergy Operations, Inc.  
P.O. Box 220  
St. Francisville, Louisiana 70775

SUBJECT: REGULATORY CONFERENCE WITH ENTERGY OPERATIONS, INC.  
CONCERNING THE RIVER BEND STATION

Dear Mr. Hinnenkamp:

This refers to the meeting conducted in the Region IV office of the Nuclear Regulatory Commission, located in Arlington, Texas, on June 23, 2003, to discuss safety concerns identified during the September 18, 2002, event which involved a turbine trip and subsequent reactor scram with a loss of feedwater flow.

Issues discussed at the conference included a synopsis of the event, the apparent violation identified during the special inspection of the event, and a review of the assessment of risk associated with the event.

During the meeting your staff indicated that documentation describing the process your staff used to complete your risk assessment would be provided to NRC within 2 weeks. We will review this information and inform you if additional information is required.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter will be placed in the NRC's Public Document Room.

Should you have any questions concerning this matter, we will be pleased to discuss them with you.

Sincerely,

David N. Graves, Chief  
Project Branch B  
Division of Reactor Projects

Docket: 50-458  
License: NPF-47

Entergy Operations, Inc.

-2-

Enclosures:

1. Agenda
2. Attendance List
3. Licensee Presentation

cc w/enclosures:

Senior Vice President and  
Chief Operating Officer  
Entergy Operations, Inc.  
P.O. Box 31995  
Jackson, Mississippi 39286-1995

Vice President  
Operations Support  
Entergy Operations, Inc.  
P.O. Box 31995  
Jackson, Mississippi 39286-1995

General Manager  
Plant Operations  
River Bend Station  
Entergy Operations, Inc.  
P.O. Box 220  
St. Francisville, Louisiana 70775

Director - Nuclear Safety  
River Bend Station  
Entergy Operations, Inc.  
P.O. Box 220  
St. Francisville, Louisiana 70775

Wise, Carter, Child & Caraway  
P.O. Box 651  
Jackson, Mississippi 39205

Mark J. Wetterhahn, Esq.  
Winston & Strawn  
1401 L Street, N.W.  
Washington, DC 20005-3502

Manager - Licensing  
River Bend Station  
Entergy Operations, Inc.  
P.O. Box 220  
St. Francisville, Louisiana 70775

Entergy Operations, Inc.

-3-

The Honorable Richard P. Ieyoub  
Attorney General  
Department of Justice  
State of Louisiana  
P.O. Box 94005  
Baton Rouge, Louisiana 70804-9005

H. Anne Plettinger  
3456 Villa Rose Drive  
Baton Rouge, Louisiana 70806

President  
West Feliciana Parish Police Jury  
P.O. Box 1921  
St. Francisville, Louisiana 70775

Michael E. Henry, State Liaison Officer  
Department of Environmental Quality  
Permits Division  
P.O. Box 4313  
Baton Rouge, Louisiana 70821-4313

Brian Almon  
Public Utility Commission  
William B. Travis Building  
P.O. Box 13326  
1701 North Congress Avenue  
Austin, Texas 78701-3326

Electronic distribution by RIV:  
 Acting Regional Administrator (TPG)  
 DRP Director (ATH)  
 Acting DRS Director (TWP)  
 Senior Resident Inspector (PJA)  
 Branch Chief, DRP/B (DNG)  
 Senior Project Engineer, DRP/B (RAK1)  
 Staff Chief, DRP/TSS (PHH)  
 RITS Coordinator (NBH)

ADAMS: ☒ Yes ☐ No Initials: gr  
☒ Publicly Available ☐ Non-Publicly Available ☐ Sensitive ☒ Non-Sensitive

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RIV:C:DRP/B				
DNGraves;df				
<i>PHH</i>				
7/ 7/03				

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ENCLOSURE 1

**Regulatory Conference Agenda**

CONFERENCE WITH ENTERGY OPERATIONS, INC.,  
RIVER BEND STATION

JUNE 23, 2003

NRC REGION IV, ARLINGTON, TEXAS

- |                                     |  |
|-------------------------------------|--|
| 1. Introduction and Opening Remarks | Pat Gwynn, Acting Regional Administrator                           |
| 2. Issue Discussion                 | Gail Good, Acting Deputy Director, Division<br>of Reactor Projects |
| 3. Licensee Presentation            |  |
| 4. NRC Caucus                       |  |
| 5. Resume Conference                |  |
| 6. NRC Closing Remarks              | Pat Gwynn  |

## REGULATORY CONFERENCE ATTENDANCE

LICENSEE/FACILITY	Entergy Operations/ River Bend Station
DATE/TIME	June 23, 2003/1:00 p.m. CDT
LOCATION	U. S. NRC Region IV Office, 611 Ryan Plaza Drive, Suite 400 Arlington, TX
NAME (PLEASE PRINT)	ORGANIZATION
Mike Tschultz	NRR/DSSA/SPSB
GARETH PARRY	NRR/DSSA
Patricia Campbell	Winston & Strawn
Peter Wilson	NRR/DSSA/SPSB
Michael Webb	NRR/DLPM/P04-1
Jennifer Dixon-Herrity	OE
PETER KOLTAY	NRR
FRED EMERSON	NEI
Phil Qualls	NRR/DSSA/SPLB
Daniel Frumkin	NRR/DSSA/SPLB

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NAME (PLEASE PRINT)	ORGANIZATION
Gail M. Good	USNRC, Region IV
Pat Gwynn	USNRC, Region IV
David Graves	USNRC, Region IV
Michael Miller	USNRC, RBS Resident Inspector
Karla Smith	US NRC, RIV
Gary Sanborn	"

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NAME (PLEASE PRINT)	ORGANIZATION
Kristi Hoffstatler	Licensing - Entergy - River Bend
Ricky Summitt	RSC - consultant
Rick Thomas	Licensing - Entergy Headquarters
Glenn Ashley	Entergy - Arkansas Nuclear One Licensing
Rebecca Nease	Region IV / NRC
Michael C. Hay	Region IV / NRC
Timothy A. Hope	TXU
STEVEN D. KARAYAK	TXU
Michael F. Runyan	Region IV / DRS



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DATE/TIME	June 23, 2003/1:00 p.m. CDT
LOCATION	U. S. NRC Region IV Office, 611 Ryan Plaza Drive, Suite 400 Arlington, TX
NAME (PLEASE PRINT)	ORGANIZATION
William A. Eaton	Entergy Operations, Inc.
Rick J. King	" " RIVER BEND
William R. Brian	" " " "
DEEPAK RAO	Entergy Operations, Inc.
Loys Bedell	Entergy Operations, Inc.
THOMAS L. HUNT	ENTERGY OPERATIONS, INC
Joseph W. Leavines	Entergy Operations, Inc.
JOEY A. CLARK	ENTERGY OPERATIONS, INC.
Robert Biggs	ENTERGY OPERATION, INC
DAVID P. Loveless	NRC, REGION IV



# River Bend Station

September 2002 Scram Event  
Risk Perspectives



# Opening Remarks

Bill Eaton, VP Engineering



# Agenda

- Opening Remarks B. Eaton
- Agenda Review & Timeline R. King
- Event Description J. Clark
- Risk Model/Methodology D. Rao
  - PSA Model
  - Evaluation Results
- Risk Evaluation L. Bedell
  - Internal Risks
    - Changes to Model
  - External Risks
    - Design Basis Review
    - Review of Actual Plant Conditions
    - Scenarios for September Scram
  - Large Early Release
  - Fire
    - Fire Risk Assumptions
    - Detailed Fire Risk Evaluation
- Regulatory Summary R. King
- Closing Remarks B. Eaton



# Timeline

DATE	Milestone	Risk (ICCDP)
9/18/02	Plant Scram w/ Loss of Feedwater	-
	Initial risk evaluation	9.3 E-7
11/14/02	NRC Identified Finding "Procedure Inadequate"	-
1/9/03	NRC SRA on site @ RBS	7.7 E-7
2/7/03	IR issued	-
3/19/03	SRA informed of IPEEE actions for 18 fire areas	-
3/31/03	RBS provided SRA with external events information (IPEEE screening results)	7.7 E-7
4/11/03	Notified of preliminary finding greater than Green	-
5/6/03	Choice letter received	-
5/20/03	RBS decision on Reg. Conf.	5.3 E-7



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# Event Description

- Initial Conditions
  - Mode 1
  - Reactor Power 100%
- Turbine Control System Malfunction
  - Turbine control valves and intercept valves driven closed
  - Bypass valves opened
  - Reactor pressure increased – positive reactivity addition
- High Neutron Flux Reactor Protection Trip
  - Reactor Scram
- Plant performed as expected with the exception of CNM-FCV200



# Event Description

- Reactor Level 3
  - Feedwater Level Control System set point set down actuated as designed causing a rapid increase in Condensate / Feedwater System Flow
  - Unexpected closing of full flow filtration bypass valve (CNM-FCV200)
  - Reactor feed pumps tripped on low suction pressure
  - RCIC was initiated to maintain Reactor level
  - Condensate System was shutdown by the operators due recognition of leakage





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# PSA Model

- Current Model
  - Reflects plant design and procedure changes since the IPE submittal, i.e., reflects *the as-built; as-operated plant*.
  - Implemented in EOOS Risk Monitor
  - Reviewed by an industry (BWROG) PSA Certification team.
  - Includes RBS plant specific operating history (failure data and initiating events).
  - Rev 3A (completed November 2002)
- Model Configuration Control
  - Reviews of plant changes (design & procedural) per EN-S PSA Procedure CE-P-05.01
  - PSA Model Change Request (MCR) database used to track issues
  - Important issues are addressed with higher priority



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## PSA Model

- Major Update
  - Currently ongoing, expected to be completed in 1Q '04
  - Will include upgrades/update to Human Reliability Analysis, Common Cause Failure Analysis
  - Plant specific failure and initiating events data
- Routine Updates Include:
  - Plant specific initiator frequency update
  - Failure data update (including plant specific)
  - Improving methods in selected model elements
  - Evaluation and keeping up with latest accepted industry practices/standards



# PSA Model

- Long-term enhancements
  - Scheduled
    - External Events PSA
    - Transition Risk
    - Improved LERF Tools
    - Shutdown Risk Models
- Developed interim fire risk tool
  - This really was an accelerated item to assist in the Sept. 18 scram risk evaluation
  - Provided us additional insights that we will apply to all EN-S sites



# PSA Model

## – Accelerated Update

- Provides more accurate characterization of event
- Reviewed model changes that would impact CDF
- Focused primarily on impact to high pressure injection and depressurization
- Accelerated these update items to support September Scram Risk Assessment



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# Improved Fire Risk Model

- The Sept. 18 scram evaluation has resulted in an Improved Fire Risk Quantification Tool being available for future evaluations at River Bend
- Considerably more realistic than IPEEE screening fire evaluations
- Intend to apply this enhancement to other EN-S PSAs
- Uses the latest tree corresponding to the as built, as operated plant (instead of IPEEE vintage model)
- This tool will help in better managing RBS risk profiles in the future



# Risk Evaluation Results

<b>Risk Component for 126-day period</b>	<b>Pre-Special Inspection Risk Evaluation</b>	<b>Initial Entergy Evaluation</b>	<b>After PSA Refinements</b>
Fire Risk	ICCDP 9.3E-7	Not significant (well below 1E-6) via results from screening method	ICCDP quantified with additional model refinements to be ~3E-10
Internal Events	ICCDP 9.3E-7	ICCDP ~7.7E-7 using MOR	ICCDP quantified with updated model and shown to be ~5.3E-7



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# Risk Evaluation Results

<b>Risk Component for 126-day period</b>	<b>Pre-Special Inspection Risk Evaluation</b>	<b>Initial Entergy Evaluation</b>	<b>After PSA Refinements</b>
Seismic	Considered to be insignificant	Considered to be insignificant	Confirmed to be insignificant
Other External Events (wind, floods, others)	Considered to be insignificant	Considered to be insignificant	Confirmed to be insignificant





# Risk Evaluation Results

<b>Risk Component for 126-day period</b>	<b>Pre-Special Inspection Risk Evaluation</b>	<b>Initial Entergy Evaluation</b>	<b>After PSA Refinements</b>
LERF	Considered to be insignificant	Considered to be insignificant	$\Delta$ LERF assessed to be below $5E-9$
<b>Total Risk &amp; Conclusion</b>	<b>ICCDP <math>9.3E-7</math></b>	<b><math>\sim 7.7E-7</math> (ICCDP) considered external events, assessed to be insignificant</b>	<b><math>\sim 5.3E-7</math> (ICCDP); <math>&lt; 5E-9</math> (<math>\Delta</math>LERF) external events confirmed to be insignificant</b>



**BREAK**



# Agenda

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# Preliminary Significance Determination

- Internal Events ICCDP of  $7.7E-7$
- All Reactor Scrams would Result in a Loss of Feedwater and Condensate
- Limited Credit For CRD with HPCS and RCIC Failure to Run (after 6 hours)
- Fire ICCDP of  $8E-7$
- Fire PRA Screening Process used to Determine Fire ICCDP
- The NRC combined internal and external events to derive a best estimate judgment of  $1.6E-6$ .
- The NRC agreed with the internal events number of  $7.7E-7$  in their letter of May 2, 2003.

# Risk Evaluation

- Internal Events
  - Changes to Model
- External Events
  - Design Basis Review
  - Review of Actual Plant Conditions
  - Scenarios for September Scram
- Large Early Release
- Fire Risk Events
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  - Detailed Fire Risk Evaluation



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## Current Model Features

### MOR features:

- Div 3-Cross Connect
- Instrument Air Plant Mods
- Component Cooling Water Plant Mods
- Service water 599 valve mod (EDG return valve)
- DC power system modeling refinements in MOR
- RCIC system mods
- Offsite power recovery is more accurate
- CRD availability



# Internal Events Model

## Accelerated Updates:

- Incorporated CRD following HPCS and RCIC failures after 6 hours
- Updated DC Power Model to remove Battery Depletion for Systems that Start Early
- Removed DC Dependencies for MCC Powered Components



# Internal Events Model

## Accelerated Updates:

- Corrected removal of HPCS & RCIC in EOOS calculation (Increase in CDF)
- Updated HPCS and RCIC Failure to Start Probabilities based on plant specific data
- Updated Common Cause Failure of ADS Valves Based on NUREG/CR-5497





# Internal Events Results Based on Model

$$\text{Incremental Risk} = (\text{instant. CDF (/yr)} - \text{base CDF}) * \frac{\text{Actual Time (days)}}{365 \text{ d/yr}}$$

$$5.27\text{E-}7 = (9.95\text{E-}6/\text{yr} - 8.46\text{E-}6/\text{yr}) * 126/365$$



# Risk Evaluation

- Internal Events
  - Changes to Model
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  - Design Basis Review
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# External Event Overview

- External Event Review
  - Seismic
  - High Winds (Hurricanes, Tornadoes)
  - External Flooding
  - Transportation
  - Other (Severe Weather, Lightning, External Fire)



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# Design Basis Information

- Feedwater and Condensate are not credited for DBA External Events.
- Feedwater and its Support Systems are Non-Seismic Category and Non-Safety Related.
- All Feedwater support systems are not protected from weather events (offsite power lines).



# Qualitative Review of Actual Data

- Seismic frequency for RBS is very low ( $>0.5g$  seismic event =  $1.2E-6/\text{yr}$ )
- Highest average Wind  $< 10$  mph
- Mild Drought (flooding less likely)
- Security changes reduce transportation events
- Looked at all scenarios and eliminated them as possible contributors to risk.
- **Meets 1975 Standard Review Plan for IPEEE and design basis.**



# Risk Evaluation

- Internal Events
  - Changes to Model
- External Events
  - Design Basis Review
  - Review of Actual Plant Conditions
  - Scenarios for September Scram
- Large Early Release
- Fire Risk Events
  - IPEEE Methodology
  - Detailed Fire Risk Evaluation



# Large Early Release

- Major Contributors to LERF
  - Containment Isolation
  - Hydrogen Igniters
  - Suppression Pool Bypass
- Level 1 Cutsets show Major Contributors Not Impacted by Event
- $\Delta$ LERF Impact Estimated at  $\sim 5E-9$



# Risk Evaluation

- Internal Events
    - Changes to Model
  - External Events
    - Design Basis Review
    - Review of Actual Plant Conditions
    - Scenarios for September Scram
  - Large Early Release
- Fire Risk Events
    - Fire Risk Assumptions
    - Detailed Fire Risk Evaluation





# Fire Risk Overview

- IPEEE Fire Risk Assumptions
- IPEEE Screening Process
- Re-Evaluated Fire Areas w/ Feedwater Credit
- Fire Risk Results
  - Fire ICCDP =  $8E-7$  Based on IPEEE Fire Screening Process





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# Fire Protection Design

- Post-Appendix R Plant
- Divisional Cable Separation
- Strong Fire Barriers
- Predominantly IEEE-383 Cable
- Little reliance on manual actions
- Detection and suppression in most areas
- IEEE screening method does not measure the impact of post Appendix R designs



# Fire Risk Assumptions - IPEEE

- All Fires in the Appendix R Fire Areas result in a Reactor Scram
- Generally Only Credited SSA Equipment
- Very little credit for automatic or manual suppression
- Components fail in worst case position
- No Credit for Thermo-Lag Fire Barriers

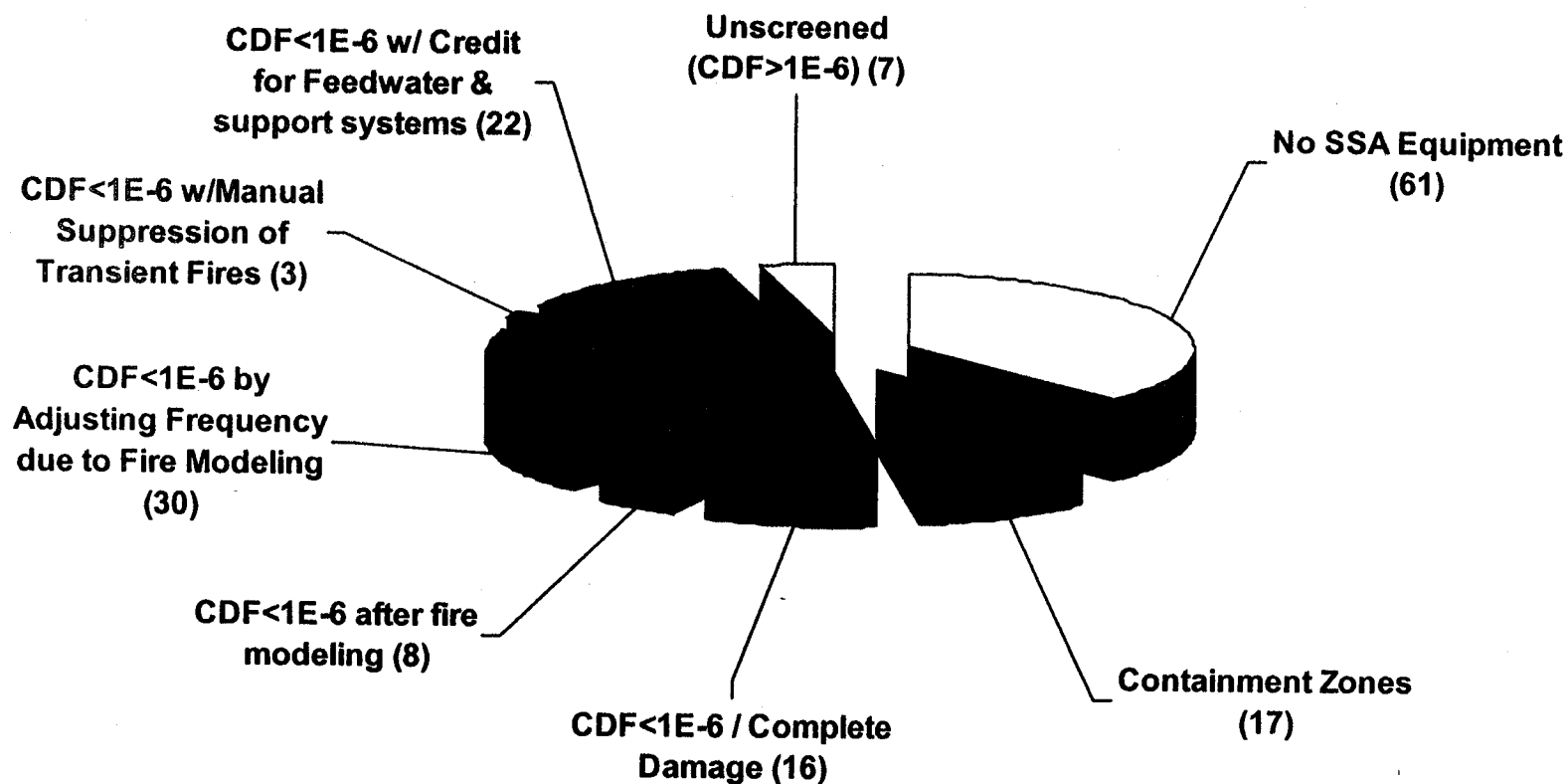


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# Fire Risk Assumptions – IPEEE

- Fire Damage assumed immediate and complete
- No Credit for Roving Fire Watches
- Fire Severity only Credited in Main Control Room and Div. I and II EDG rooms
- No Credit for Limitation of Transient Combustibles

# IPEEE Screening Process



164 Appendix R Fire Zones

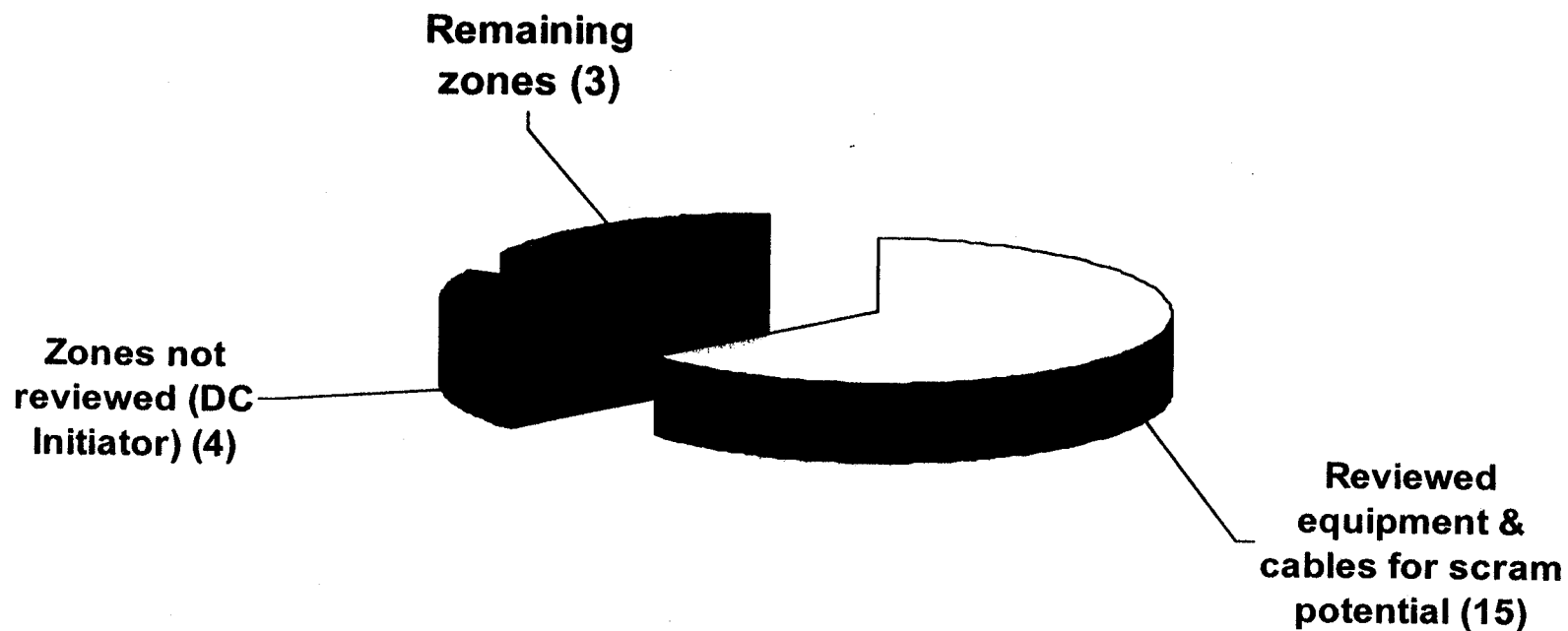


# Re-Evaluation of Feedwater Areas

- Reviewed fire zones to identify those that credited feedwater
- Two techniques used for re-evaluation
  - Review for scram potential
  - Calculate fire severity factors



# Fire-Area Evaluation Process



22 Fire Zones w/ Credit for Feedwater & Support Systems



# Fire Zone Screening Method

Fire Screen	# Zones Credited for Feedwater	Impact of Crediting FW	Other Areas of Evaluation
Unscreened	7 FW not credited, cannot easily determine damage to FW or Supports, Delta CDF evaluated as 0.	Base CDFs drop from E-6 range to E-9 range. Also scram potential drops.	Scram Potential, Severity Factors
Feedwater Credit, Manual Suppress	22 FW credited. Risk impact evaluated. 3 FW not credited. Cannot easily determine damage to FW or Supports, Delta CDF evaluated as 0.	Base CDFs drop from E-7 range to E-10 range. Also scram potential drops.	Done. Scram Potential, Severity Factors
Fire Scenario Frequency	30 FW not credited. Screened w/o evaluating FW.	Base CDFs drop from E-7 range to E-11 range. Also scram potential drops.	Scram Potential, Severity Factors, Manual Suppression
Fire Modeling	8 FW not credited. Screened w/o evaluating FW.	Based CDFs drop from E-7 range to E-12 range. Also scram potential drops.	Scram Potential, Severity Factors, Manual Suppression, Fire Scenario Frequency
All Damage	16 FW not credited. Screened w/o evaluating FW.	Based CDFs drop from E-7 range to E-14 range. Also scram potential drops.	Scram Potential, Severity Factors, Manual Suppression, Fire Scenario Frequency, Fire Modeling.
Containment	17 FW not credited. Screened qualitatively.	Evaluation of scram potential.	Scram Potential, Severity Factors, Manual Suppression, Fire Scenario Frequency, Fire Modeling.
No SSA	61 FW not credited. Screened qualitatively.	Evaluation of scram potential. Scrams bounded by internal events PSA.	Scram Potential, Severity Factors, Manual Suppression, Fire Scenario Frequency, Fire Modeling.

**Fire Risk for zones is insignificant.**

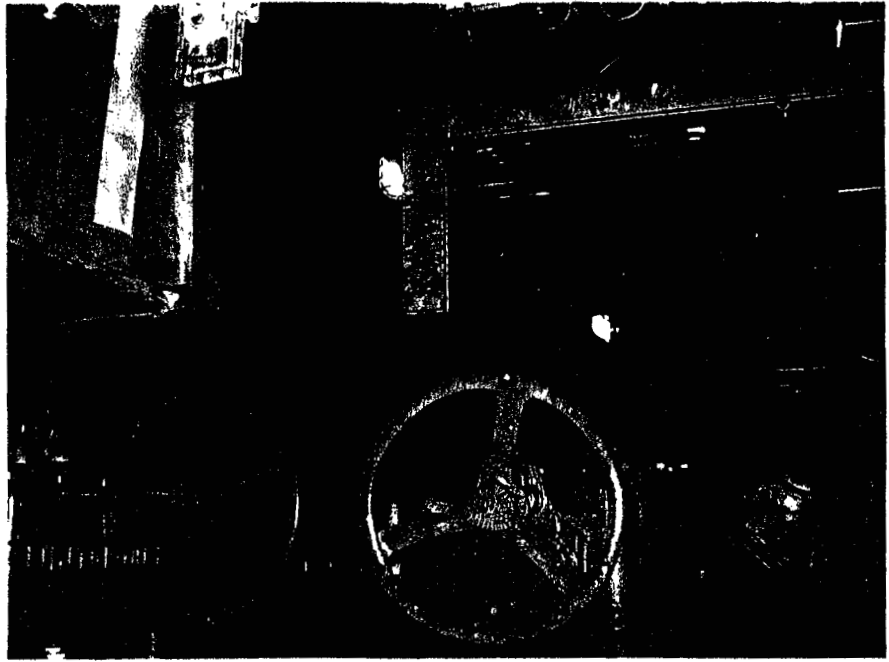
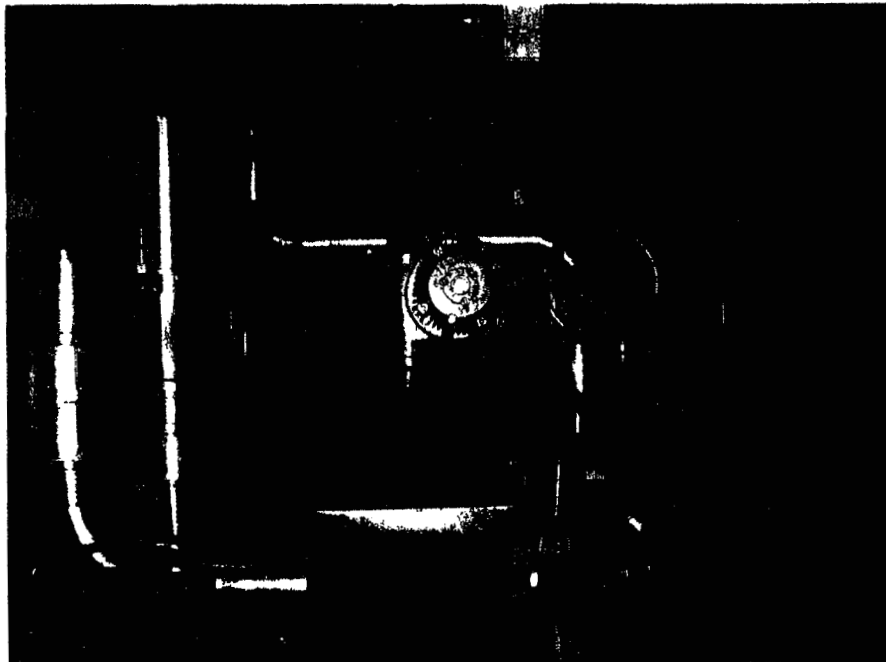


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# Fire Area Examples

Example 1:

Consider zone AB-2/Z-1 in the River Bend Fire PSA,  
the HPCS Room.





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## AB-2/Z-1 Fire PSA Updates

This room contains the following equipment and cables in addition to HPCS equipment:

- DFR, Auxiliary Building Floor drain system, level switches, pumps (non-safety)
- RMS, RHR Room East Radioactivity Monitors, (non safety)
- SSR, Reactor Plant Sample System (non-safety)
- HVR HPCS Room Unit Cooler power cable.
- JPB, non-safety 120V power to receptacle in instrument rack.
- RHS, RHR Pump Room 2C, Elevator Area, RPCCW Area , and RHR Hoist area temperature (both divisions I and II). These isolate E12-MOVF008 and E12-MOVF009 shutdown cooling isolation valves. These valves are required to open approximately 72 hours after shutdown for cooling and are addressed in the safe shutdown analysis.
- ERS, Earthquake recording system (non-safety)



# AB-2/Z-1 Fire PSA Updates

	Initial Entergy evaluation	After PSA Refinements	Comments
Baseline w/Feedwater available	4.64E-11	0 Review of cable routings showed that a fire in this zone would not cause a plant scram	PSA Refinements include: •Model update •Use of updated model in the fire risk quantification
Case w/Feedwater unavailable	5.64E-8 (would screen per IPEEE)	0 Review of cable routings showed that a fire in this zone would not cause a plant scram	
$\Delta$ CDF	5.64E-8 Feedwater did not impact the result (it was not envisioned that a $\Delta$ CDF would be determined using this information)	0	



# Fire Severity Factors

- **Definition:** *Fraction of historical fires (EPRI Fire Events Database) in the area that are severe*
- Calculated Fire Severity Factors for 22 zones w/ feedwater credit
- Fire frequency reduced by the fire severity
- Severity factors ranged from 0.01 to 0.24



# Fire Severity Factors

- NSAC-178L, "EPRI Fire Events Database" used for evaluation
- NSAC-178L also used for IPEEE Fire Frequencies
- Review of EPRI TR-1003111 (Update of NSAC-178L) - We've looked at the standard and confirmed no significant impact.



# Fire Severity Split Fraction

Qualitative Meaning	Value
Clear indication of a severe fire	1.0
Incomplete or inadequate information to formulate a clear understanding of event but the description or other similar events would indicate that the event was not severe.	0.5
Indication that the event was not severe but extenuating circumstance could have altered this evaluation such as a delay in response to the fire or the presence of additional combustible material that did not happen to ignite.	0.1
Very unlikely that the event was a severe fire, but cannot be completely ruled out based on the information provided.	0.05
Clearly meets criteria for exclusion as a severe fire	0.0



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## Fire Area Examples

### Example 2:

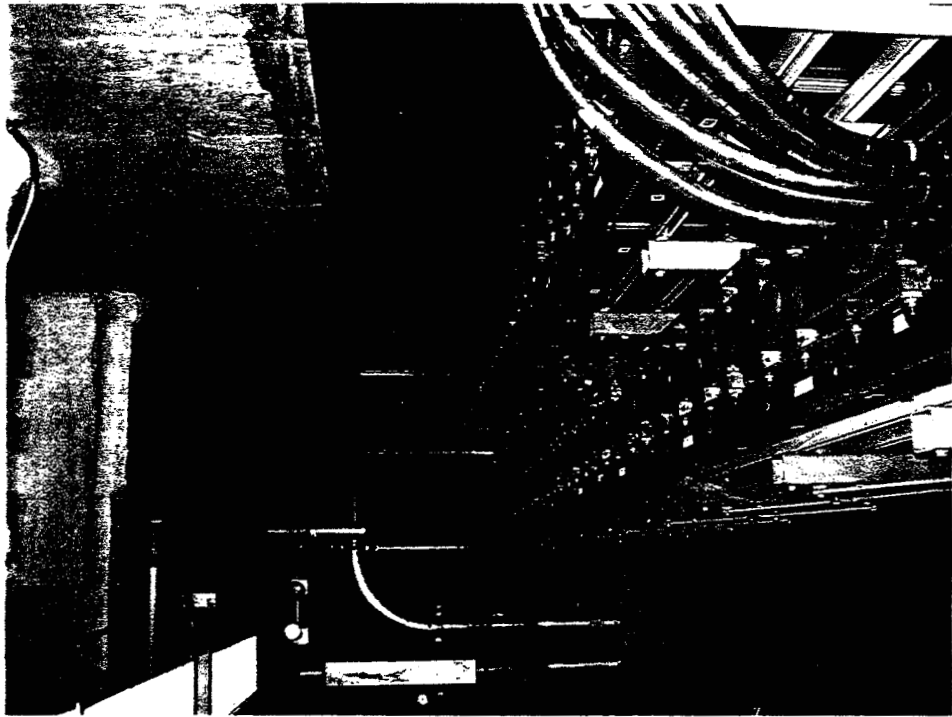
Consider zone in the Fire PSA, the C18 Room (DIV1 DC)

This room contains the following equipment and cables in addition to Division 1 DC Power:

- Ventilation system cables for battery room temperature control and monitoring (non-safety).



# Battery Room





# C18 Fire PSA Updates

	<b>Initial Entergy evaluation</b>	<b>After PSA Refinements</b>	<b>Comments</b>
Baseline CDF/yr for zone w/ Feedwater available	3.80E-09	3.04E-11	PSA Refinements include: •Model update including DC power refinement •Application of Fire Severity Factor for this zone •No credit taken for auto or manual suppression of fire
Case CDF/yr for zone w/ Feedwater unavailable	4.92E-07	3.31E-11	
$\Delta$ CDF/yr	4.88E-07 Feedwater did not impact the result (it was not envisioned that a $\Delta$ CDF would be determined using this information)	2.74E-12	

# Fire Risk Results by Zone

Fire Zone	Severity Factor	Base CDF/yr	Case CDF/yr (w/o feedwater)	$\Delta$ CDF/yr
C-13A	0.02	5.64E-13	2.97E-12	2.41E-12
C-13B	0.02	5.64E-13	2.97E-12	2.41E-12
C-18	0.014	3.04E-11	3.31E-11	2.74E-12
C-19	0.014	2.44E-11	2.72E-11	2.74E-12
C-20	0.014	2.16E-12	1.67E-10	1.65E-10
C-21	0.014	1.81E-12	1.40E-10	1.38E-10
C-23	0.014	3.04E-12	2.80E-10	2.77E-10
C-26	0.014	3.19E-12	3.56E-10	3.53E-10
<b>Total</b>		<b>6.61E-11</b>	<b>1.01E-09</b>	<b>9.43E-10</b>

**Even if a Severity Factor of .1 is assumed,  $\Delta$ CDF < 10E-8.**



## Fire Risk Results

$$\text{Incremental Risk} = (\text{instant. CDF (/yr)} - \text{base CDF}) * \text{Actual Time (days)} / 365 \text{ d/yr}$$

$$3.27\text{E-}10 = (1.01\text{E-}9 - 6.61\text{E-}11) * 126/365$$



# Agenda

- Opening Remarks B. Eaton
  - Agenda Review & Timeline R. King
  - Event Description J. Clark
  - Risk Model/Methodology D. Rao
    - PSA Model
    - Evaluation Results
  - Risk Evaluation L. Bedell
    - Internal Risks
      - Changes to Model
    - External Risks
      - Design Basis Review
      - Review of Actual Plant Conditions
      - Scenarios for September Scram
    - Large Early Release
    - Fire
      - Fire Risk Assumptions
      - Detailed Fire Risk Evaluation
- Regulatory Summary R. King
- Closing Remarks B. Eaton



## Preliminary Significance Determination

- Inspection Report 02-07:

*“... installed a plant modification, in a temporary condition, without providing sufficiently detailed operating procedures and/or operator training.”*



# Risk Results Summary

PSA	Pre-Special Inspection Risk Evaluation (9/02)	Initial Entergy Evaluation (1/03 – 3/03)	After PSA Refinements (6/03)
Internal Events	9.3 E-7 (ICCDP)	~7.7E-7 (ICCDP)	~5.3E-7 (ICCDP)
External Events (including fires)	0	Screened: Insignificant ( $<1E-6$ )	$<1E-9$
Total Risk	9.3 E-7 (ICCDP)	~7.7E-7 (ICCDP) considered external events, assessed to be insignificant	~5.3E-7 (ICCDP); external events confirmed to be insignificant



*Entergy*

# Regulatory Summary

Very Low Safety Significance Conclusion:

**GREEN**





# Agenda

- |                          |           |
|--------------------------|-----------|
| • Introduction           | R. King   |
| • Opening Remarks        | B. Eaton  |
| • Event Description      | J. Clark  |
| • Risk Model/Methodology | D. Rao    |
| – PSA Model              |           |
| – Evaluation Results     |           |
| • Key Assumptions        | L. Bedell |
| – Internal Risks         |           |
| – External Risks         |           |
| • Seismic                |           |
| • Flooding               |           |
| • Hurricane              |           |
| • High Wind              |           |
| • Transportation         |           |
| – Large Early Release    |           |
| – Fire                   |           |
| • Regulatory Summary     | R. King   |
| • Conclusion             | B. Eaton  |