

36.6 IE03 Salem

The shutdowns were initiated to address the impact of an unexpected external event that threatened equipment in the switchyard and as such do not need to be included as an unplanned power change. However, it is expected that the licensee would update procedures, training, etc., to reflect the expected response in the event of similar meteorological conditions (i.e., high winds with minimal rain).

If these conditions are experienced in the future, they should be considered an expected problem, and any power change greater than 20% should be counted unless the actions to take in response to the condition are proceduralized, cannot be predicted greater than 72 hours in advance, and are not reactive to the sudden discovery of an off-normal condition.

36.7 MS01-4 Catawba

Page 29 of NEI 99-02, Revision 2, states that "[the] overhaul exemption does not normally apply to support systems except under unique plant-specific situations and on a case-by-case basis" and that "[t]he circumstances of each situation are different and should be identified to the NRC so that a determination can be made."

FAQs 254, 315 and 337 resulted in exemptions for support system overhauls based on unique plant situations. For the Catawba service water piping replacements, information was provided that detailed the extensive nature of the work resulting in a significant amount of time that the support system would be unavailable, the need for Technical Specification changes, the affect on the monitored systems performance indicators (and impact due to the NRC Action Matrix), and the enhanced system performance expected for long term operations. For the Grand Gulf safety system water pump replacements, the work was performed to upgrade the pump material and the new pumps were expected to last the life of the plant.

Several factors, including the information provided by the licensee (discussed above) and the items listed in NEI 99-02 (page 29, lines 22 through 25), were taken into consideration. It is noted that since each case is unique, the list of factors to consider (in NEI 99-02) is not all inclusive.

For this case, the refurbishment of the nuclear service water system pumps on a specified interval, an exemption of the overhaul hours does not apply. This decision is based on several factors including that the work is a "minor" overhaul type activity that is performed periodically to maintain reliable operation of the system and the hours cascaded into the four monitored systems have little impact on the margin to a threshold. As stated in FAQ 254, "...[the licensee understood] that there was a desire to eliminate exclusion of monitored systems unavailability hours caused by minor 'overhaul' type activities on supporting systems."

Hours Train Required

The term "hours train required" is associated with the hours a train is required to be available to satisfactorily perform its safety function. Unavailable hours are counted only for periods when a train is required to be available for service.

The default values identified below are typical; however, differences may exist in the number of trains required during different modes of operation. The calculational methodology accommodates differences in required train hours in these cases. The default value in the denominator can be used to simplify data collection. However, the numerator must include all unavailable hours during periods that the train is required regardless of the default value.

- Emergency AC power system. This value is estimated by the number of hours in the reporting period, because emergency generators are normally expected to be available for service during both plant operation and shutdown. *If the emergency AC power system (all trains) is not required to be in service at all times, then the value is the number of hours in the reporting period minus the number of hours the emergency AC power system is not required.*
- Residual Heat Removal System. This value is estimated by the number of hours in the reporting period, because the residual heat removal system is ~~required~~ normally expected to be available for decay heat removal at all times. *If the residual heat removal system (all trains) is not required to be in service at all times, then the value is the number of hours in the reporting period minus the number of hours the residual heat removal system is not required.*
- All other systems. This value is estimated by the number of critical hours during the reporting period, because these systems are usually required to be in service only while the reactor is critical, and for short periods during startup or shutdown. In some cases this value is already provided as part of the calculation, as in unplanned automatic scrams per 7,000 hours critical data.