PBNP NEI 99-01 UPGRADE EALs

Deviations and Differences Discussion

Evaluation Process

- A word-for-word review was conducted to reevaluate differences and deviations
- Comparison matrix developed to document the review results
- Evaluated by:
 - NMC EP Management
 - NMC Regulatory Affairs
 - NMC EP Peers
 - Consultants

Definitions used for the evaluation

DIFFERENCE – an EAL change where the basis scheme guidance (NUREG, NUMARC. NEI) differs in wording but agrees in meaning and intent, such that classification of an event would be the same, whether using the basis scheme guidance or the site-specific proposed EAL. Examples of differences include the use of site-specific terminology or administrative reformatting of site-specific EALs.

Definitions used for the evaluation

DEVIATION - an EAL change where the basis scheme guidance differs in wording and is altered in meaning or intent, such that classification of the event could be different between the basis scheme guidance and the site-specific proposed EAL. Examples of deviations include the use of altered mode applicability, altering key words or time limits, or changing words of physical reference (protected area, safety-related equipment, etc.).

9 EAL Changes Identified to Eliminate Deviations

- MU11.1 Turbine failure
- MU15.1 Reactor vessel level
- HA3.1 Vehicle crash
- HA1.1 Security
- HS1.1 Security
- MU3.1 Fuel Cladding degradation
- MS12.1 Annunciators
- RA3.2 Abnormal rad levels
- MS9.1 Loss of DC power

3 EAL Deviations Requested for Approval

- MG15.1 Core and Containment challenges
- HU4.2 High Wind
- HA4.2 High Wind