



The bases of this PI is SCRAMs that have undue complications or undue risk because of equipment problems. Not all the items that count in this PI are necessarily difficult from an operator standpoint. Those SCRAMs would be a risk impact in comparison to a "typical" SCRAM.

The PI may require a plant to use a different criteria than another plant. For example open of relief valves on a turbine trip is normal for some plants and does not pose a risk of operating issue. For other BWRs SRV would not be expected to open and their opening may be indicative of an abnormal transient.

Remember these questions are not being asked at the time of the event rather they are asked when it is time to submit the PI count.

All rods at 02 or beyond. This is the standard question ask for EP 2A entry. Failure to answer yes indicates a problem with performance of Control Rods.

Was level maintained above a level of XXXX (your worst case transient level goes here. On a loss of feedwater event level will drop to RCIC/HPCS/HPCI auto start. The starting of these systems does not indicate a significant transient with equipment problems has occurred. Each site needs to list a numerical value that indicates some type of problem with plant response) This question covers failures of high pressure injection as well as LOCA.

Are SRVs being used for pressure following initial actuation. SRVs can be expected to lift on some transients and is not indicative of equipment problems. (An alternative is to ask are SRV being used after X minutes which also is indicative of a problem with pressure control)

Were all emergency procedures able to be exited within 30 minutes. – This question is a "catch all" for complicating issues. The inability to exit Emergency Procedures because of Rx, Containment, or release parameters indicates complications. It also address excessive discharge of entergy to the suppression pool and secondary containment issues that indicate complications or risk. The shift is not required to have exit the Emergency Procedures at the 30 minute mark. The question is asking 30 minutes after the SCRAM were plant conditions such that the process would have allowed exiting of the EP's.

Was power restored to the ESF bus by the D/G per design? - The inability to restore power to the ESF busses automatically is indicative of problems with offsite power and/or D/G. Sustained loss of power to equipment is a complicating factor that poses risk.

Was feedwater available or recoverable using normal procedures? – This question address sustained loss of feedwater and condenser. While a plant may elect to use RCIC or CRD to maintain level this question address the risk of not having feedwater available. Should a SCRAM occur prior to placing feedwater in service this question may be answered yes.

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modeled as a T2, or Loss of PCS (Power Conversion System), initiator. A T2 initiator results in the loss of the power conversion systems (feedwater, condenser, and condensate) and the modeling of this event does allow for recovery of the power conversion systems.

Under the current Revision 2 of NEI 99-02, does this Scram count as a Scram with Loss of Heat Removal?

Response No. The clarifying notes for this performance indicator exempt scrams resulting in loss of all main feedwater flow, condenser vacuum, or turbine bypass capability caused by loss of offsite power. There is no distinction made or implied regarding a complete or partial loss of offsite power. In this case, while the loss of offsite power was not a complete loss, the loss did affect the feedwater, condensate and condenser systems.

Proposed Resolution of NEI 99-02 Guidance, attach separate mark-up revision of NEI 99-02 wording (Attach additional sheets if required):

Revise NEI 99-02R2, Page 16, line 41 as follows:

"There is no distinction made or implied regarding a complete or partial loss of offsite power. While a loss of offsite power may not be a complete loss, the loss did affect the feedwater, condensate and condenser systems."⁵

⁵ This proposed insertion would essentially incorporate a previously approved position FAQ No. 355.