

ENCLOSURE 3



STP Risk-Informed Technical Specifications

**STPNOC Meeting with NRC Staff to
Discuss RAI Responses
December 14 -15, 2005**

STP Participants

- | | |
|------------------|--------------------------|
| – Rick Grantom | Risk Management Manager |
| – Scott Head | Licensing Manager |
| – Wayne Harrison | Licensing |
| – Evans Heacock | Elec. Design Engineering |
| – Jim Morris | Licensing |
| – Drew Richards | Risk Management |
| – Bill Stillwell | Risk Management |

Desired Outcomes

1. Status/Resolve RAIs. Identify all remaining significant issues.
2. Demonstrate STP's Configuration Risk Management Program (CRMP).
3. Agree on content of next STP submittal.
4. Establish actions required for Risk Managed Technical Specifications (RMTS) guide and how it will be approved.
5. Agree on schedule for NRC visits.
6. Establish milestone plan for completion with target dates and deliverables.

Agenda

- Introduction and agreement on desired outcomes
- STP Overview and brief demonstration of CRMP
- Review responses to RAIs / Identify remaining issues
- Agree on content of next STP submittal
- Establish action required for the RMTS guide
- Establish tentative scope and schedule for NRC site visits
- Establish milestone plan for completion with target dates and deliverables

3/4.13 RISK MANAGEMENT

3/4.13.1 ALLOWED OUTAGE TIME DETERMINATIONS

LIMITING CONDITION FOR OPERATION

3.13.1 When referred to this specification, equipment that has been declared inoperable shall be evaluated for its impact on plant risk and allowed outage times determined accordingly.

APPLICABILITY: As required by the referencing specification(s) except where a Loss of Function has occurred

ACTION:

1. Within the allowed outage time of the referencing specification(s) determine that the configuration is acceptable for extension beyond the allowed outage time for the referencing specification(s),

AND

2. Within 12 hours determine that the configuration is acceptable for continued operation beyond the allowed outage time for the referencing specification(s) whenever configuration changes occur that may affect plant risk,

AND

3. Restore required inoperable subsystem, component to OPERABLE status within the acceptable allowed outage time extension or 30 days, whichever is shorter.

Note: The 30-day limitation may be applied individually to each specification for which Specification 3.13.1 has been entered provided the requirements of ACTION 1 and ACTION 2 continue to be met from the time Specification 3.13.1 was entered for the first configuration.

OR

Take the ACTION(s) required in the referencing specification(s) for required action or completion time not met

SURVEILLANCE REQUIREMENTS

4.13.1 As required by the referencing specification(s)

3/4.13 RISK MANAGEMENT

3/4.13.2 ALLOWED OUTAGE TIME DETERMINATIONS FOR INOPERABLE CROSS-TRAIN EQUIPMENT

LIMITING CONDITION FOR OPERATION

3.13.2 Application of the specified allowed outage times for inoperable equipment in different safety trains shall meet the criteria of the Configuration Risk Management Program

APPLICABILITY: Entry into the ACTION statements for two or more components associated with different safety trains and to which Specification 3.13.1 may be applied

ACTION: Determine the configuration is acceptable for the application of at least the specified allowed outage times for the affected components within the shorter of 24 hours or the shortest affected allowed outage time. For configurations where the specified allowed outage time is not acceptable, restore one or more of the affected components to OPERABLE status within the calculated allowed outage time or declare the LCO not met for the affected components and apply the associated ACTION(s).

Bases for Specification 3.13.1

Specification 3.13.1 establishes provisions for performing a risk assessment to determine required actions and allowed outage times for specifically identified specifications for structures, systems, and components. Application of the risk assessment is consistent with the requirements of the Maintenance Rule, 10CFR50.65(a)(4), to assess and manage the increase in risk that may result from maintenance activities. The process to manage the risk assesses the rate of accumulation of risk in plant configurations and determines the allowed outage time (AOT) by calculating the time required to cross a Potentially Risk-significant Threshold ($1.0E-05$).

Application of the risk assessment to manage allowed outage time in different plant configurations is complemented by the station's programs to monitor performance indicators for long-term availability of risk-significant components. The requirement to achieve acceptable long-term performance indicators provides a significant disincentive to the potential to regularly extend baseline AOTs to the detriment of availability.

TS 3.13.1.a establishes the conditions for performance of the risk assessment. The LCOs subject to the Configuration Risk Management Program (CRMP) specifically reference TS 3.13.1. The baseline AOT or required completion time specified in the LCO may be used to apply the TS 3.13.1 to determine an alternate AOT and compensatory actions.

The requirement to continuously determine the acceptability of the plant means that once the subject LCO has exceeded the baseline AOT, the risk assessment must be reperformed as needed to determine the required action and time limits for any TS component that subsequently becomes inoperable. This requirement provides assurance that the configuration risk is adequately assessed. In a configuration with multiple LCOs not met, the risk assessment may determine that the AOT is shorter than what would be allowed by the baseline time in the affected LCOs. With more than one LCO not met, the baseline time for a subsequent inoperable TS component might also be a non-conservative time to perform a risk assessment to determine the appropriate required action and time. Consequently, the risk assessment process may also be applied to determine how much time is available to perform a risk assessment for subsequent inoperable TS components.

TS 3.13.1 is applied with the referencing specification and the ACTION required by the referencing specification must be taken if the configuration risk exceeds the Potentially Risk-significant Threshold. It recognizes that the plant is in an extended AOT that has a specified required action if the required action time is exceeded. In a configuration where the risk exceeds the Potentially Risk-significant Threshold, the calculated AOT has been exceeded and the action required at the expiration of LCO AOT must be taken. If more than one LCO is beyond its frontstop time, the LCO with the most limiting required action must be followed.

Application of TS 3.13.1 will provide action for more than one train or channel of a function to be inoperable. Unless otherwise permitted in the TS, TS 3.13.1 will not be applied for pre-planned configurations where there is a complete loss of function (e.g., all three trains of ECW or all channels of an actuation logic).

If a component is determined to be inoperable and there is not reasonable assurance of its functionality or it is not capable of being addressed in the PRA model, it will be assumed to be non-functional for calculating the RICT, i.e., the component will have no Residual Functionality. For the purposes of this specification, Loss of Function occurs when there is no Residual

Functionality in any train or channel of a TS required function to mitigate specific PRA scenarios. For example, the impact of a degraded component may manifest itself only during a large-break LOCA, but not during a SGTR.

Examples of where a component has Residual Functionality such that the condition could be quantified in the determination of an allowed outage time are listed below.

- SSCs that don't meet seismic requirements but are otherwise capable of performing their design function.
- SSCs that are inoperable but secured in their safe position (e.g., a closed containment isolation valve).
- SSCs powered from a source other than their normal power source, provided the alternate power source is modeled in the PRA.
- An SSC with an inoperable automatic function if the manual actuation of the SSC is modeled in the PRA (e.g., a diesel generator with an inoperable sequencer). Actuation channels are associated with their actuated components or trains. Loss of actuation channels is not considered a Loss of Function unless no train of the actuated SSC function has Residual Functionality.
- A valve that is inoperable because it doesn't meet closure time requirements but the closure time is not important to the accident analysis.

TS 3.13.1 establishes a backstop AOT of 30 days. This backstop AOT prevents allowing a component with little or no risk significance from being inoperable indefinitely and resulting in a defacto change to the design or licensing basis of the plant. The note allows the 30-day backstop to be applied individually to specifications for which TS 3.13.1 is being used as long as the risk threshold is not exceeded as calculated from the time of the first configuration for which TS 3.13.1 was entered. This note prevents the time limit from an earlier non-risk-significant condition from unnecessarily limiting the time to restore another non-risk-significant condition that was discovered later.

Bases for Technical Specification 3.13.2

Technical Specification 3.13.2 requires confirmation that the specified allowed outage times are acceptable when ACTIONS are entered for components on different safety trains. The allowed outage times for SSCs are often based on no other SSC being inoperable at the same time. Some configurations where the plant is in two or more LCO ACTION statements could potentially impose an unacceptable level of risk. This is particularly the case if the affected components are in different safety trains because the redundancy of accident mitigation capability could be adversely affected.

STPEGS UNIT 1
Operations Report
November 28, 2005

1. A. GENERATION LAST 24 HOURS

Reactor Power: 100%	Thermal Power: 3853 MWt
Hourly Electrical Output (MW-hrs)	Gross.... 1344 Net... .1293
24 Hour Total (MW-hrs)	Gross.... 32270 Net....31035

B. RCS Integrity / Risk

RCS Identified Leak Rate is <0.12 gpm.
RCS Unidentified Leak Rate is <0.12 gpm.
Planned maintenance risk for the week is 3.34 E-09
Actual maintenance risk as of 06:00 is 0.0
Planned BOP trip risk for the week is 0%.
Actual BOP trip risk as of 06:00 is 0%.

C. TRAIN STATUS

All required equipment is operable.

D. BOP STATUS

All required equipment is available.

2. REGULATORY NOTIFICATIONS

None

3. PRIORITY CONDITION REPORTS DURING PAST 24 HOURS.

None

4. CONDITION REPORTS DURING THE PAST 24 HOURS WITH A PENDING
OPERABILITY OR REPORTABILITY REVIEW.

None

5. LIMITING CONDITION FOR OPERATION ACTION STATEMENT.

None

Submitted by: Klay Klimple

STPEGS UNIT 2
Operations Report
November 28, 2005

1. A. GENERATION LAST 24 HOURS

Reactor Power: 100%	Thermal Power:	3853 MWt	
Hourly Electrical Output (MW-hrs)	Gross....	1344	Net.... 1293
24 Hour Total (MW-hrs)	Gross....	32249	Net....31038

B. RCS Integrity / Risk

RCS Identified Leak Rate is <0.12 gpm.
RCS Unidentified Leak Rate is <0.12 gpm.
Planned maintenance risk for the week is 3.73 E-07
Actual maintenance risk as of 06:00 is 1.65 E-08
Planned BOP trip risk for the week is 0.1%.
Actual BOP trip risk as of 06:00 is 0%.
UNIT 2 is the Load Control Unit

C. TRAIN STATUS

Train "A" Essential Cooling Water, Essential Chill Water, Component Cooling Water and Emergency Diesel #21 are removed from service for planned maintenance.
All other required equipment is operable.

D. BOP STATUS

Low Pressure Heater Drip Pump #23 and Condenser Air Removal Pump #23 are removed from service for planned maintenance.
All other required equipment is available.

2. REGULATORY NOTIFICATIONS

None

3. PRIORITY CONDITION REPORTS DURING PAST 24 HOURS.

None

4. CONDITION REPORTS DURING THE PAST 24 HOURS WITH A PENDING OPERABILITY OR REPORTABILITY REVIEW.

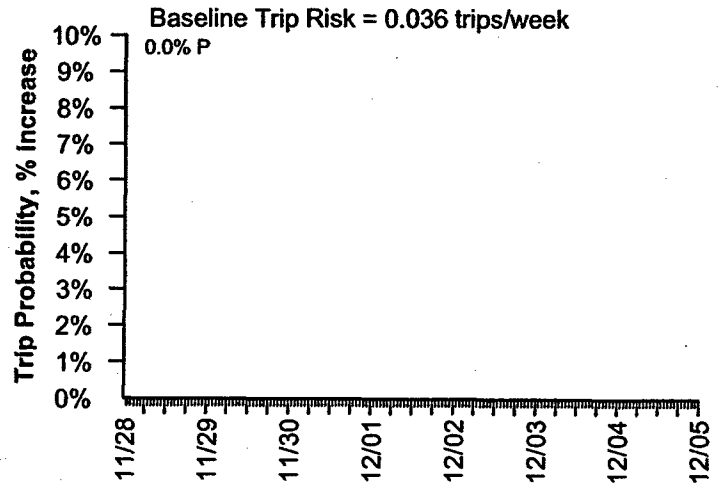
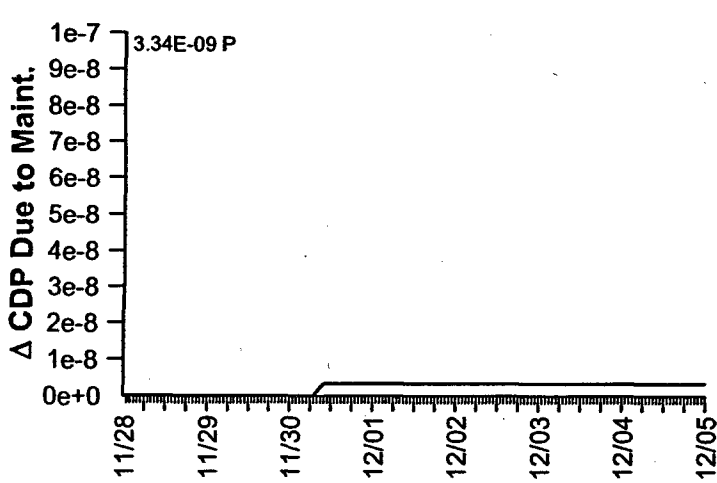
None

5. LIMITING CONDITION FOR OPERATION ACTION STATEMENT.

- OAS 10310 Component Cooling Water Train "A" declared inoperable for planned maintenance. Entered Tech Spec 3.7.3 that requires restoration within 7 days (12/4/05 @ 22:00) or a plant shutdown is required.
- OAS 10311 Essential Chill Water Train "A" declared inoperable for planned maintenance. Entered Tech Spec 3.7.14 that requires restoration within 7 days (12/4/05 @ 22:00) or a plant shutdown is required.
- OAS 10312 Emergency Diesel #21 declared inoperable for planned maintenance. Entered Tech Spec 3.8.1.1 that requires restoration within 14 days (12/12/05 @ 01:00) or a plant shutdown is required.
- OAS 10313 Essential Cooling Water Train "A" declared inoperable for planned maintenance. Entered Tech Spec 3.7.4 that requires restoration within 7 days (12/4/05 @ 22:00) or a plant shutdown is required.

Submitted by: Robert Brinkley

Planned Risk Profiles for Unit 1 Week of 11/28/2005

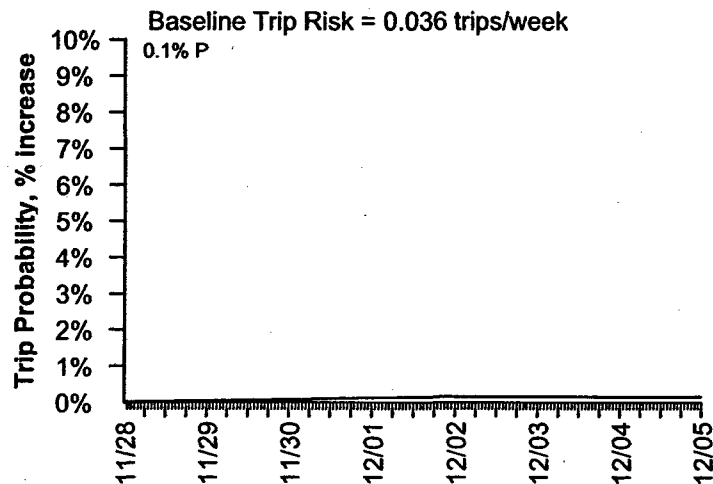
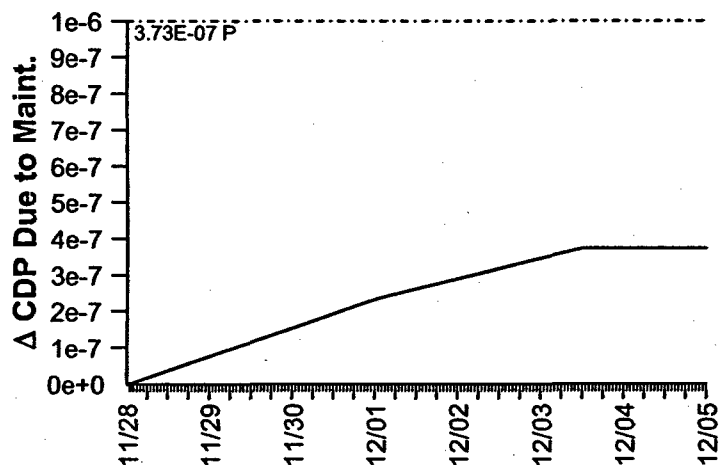


PRA Maint. State
No Risk-Significant Maintenance
PZPRVB
No Risk-Significant Maintenance

BOP Maint. State
No Risk-Significant Maintenance
No Risk-Significant Maintenance
No Risk-Significant Maintenance

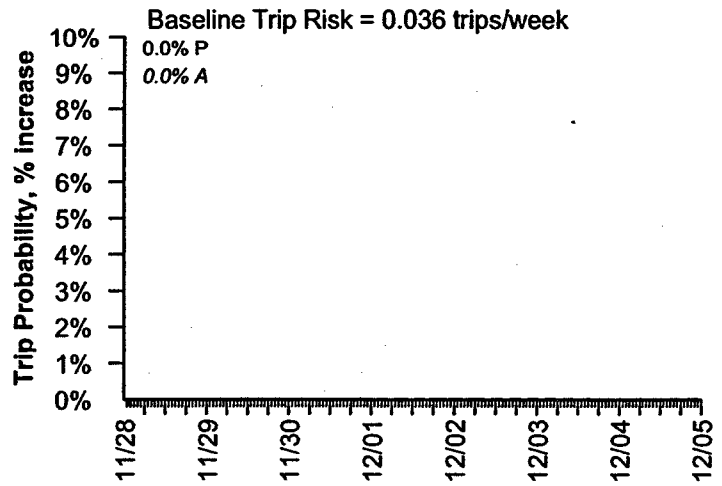
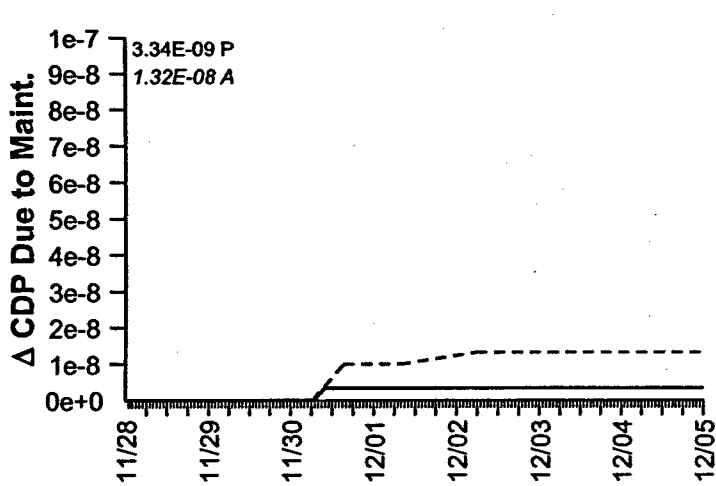
Start	End	Duration (hh:mm)	PRA Norm.	BOP Norm.
11/28 00:00	11/30 07:00	055:00	0.79	1.00
11/30 07:00	11/30 10:00	003:00	1.86	1.00
11/30 10:00	12/05 00:00	110:00	0.79	1.00

Planned Risk Profiles for Unit 2 Week of 11/28/2005



PRA Maint. State	BOP Maint. State	Start	End	Duration (hh:mm)	PRA Norm.	BOP Norm.
CHA	No Risk-Significant Maintenance	11/28 00:00	11/28 01:00	001:00	0.93	1.00
CHA EWA	No Risk-Significant Maintenance	11/28 01:00	11/28 03:00	002:00	3.94	1.00
CCA CHA DGA EWA	CAR13/23	11/28 03:00	11/30 07:00	052:00	3.94	1.00
CCA CHA DGA EWA	AC13/23 CAR13/23	11/30 07:00	11/30 09:00	002:00	3.94	1.01
CCA CHA DGA EWA	CAR13/23	11/30 09:00	12/01 01:00	016:00	3.94	1.00
CHA DGA	CAR13/23	12/01 01:00	12/01 12:00	011:00	3.13	1.00
DGA	CAR13/23	12/01 12:00	12/01 21:00	009:00	3.02	1.00
DGA	No Risk-Significant Maintenance	12/01 21:00	12/03 12:00	039:00	3.01	1.00
No Risk-Significant Maintenance	No Risk-Significant Maintenance	12/03 12:00	12/05 00:00	036:00	0.79	1.00

Actual Risk Profiles for Unit 1 Week of 11/28/2005

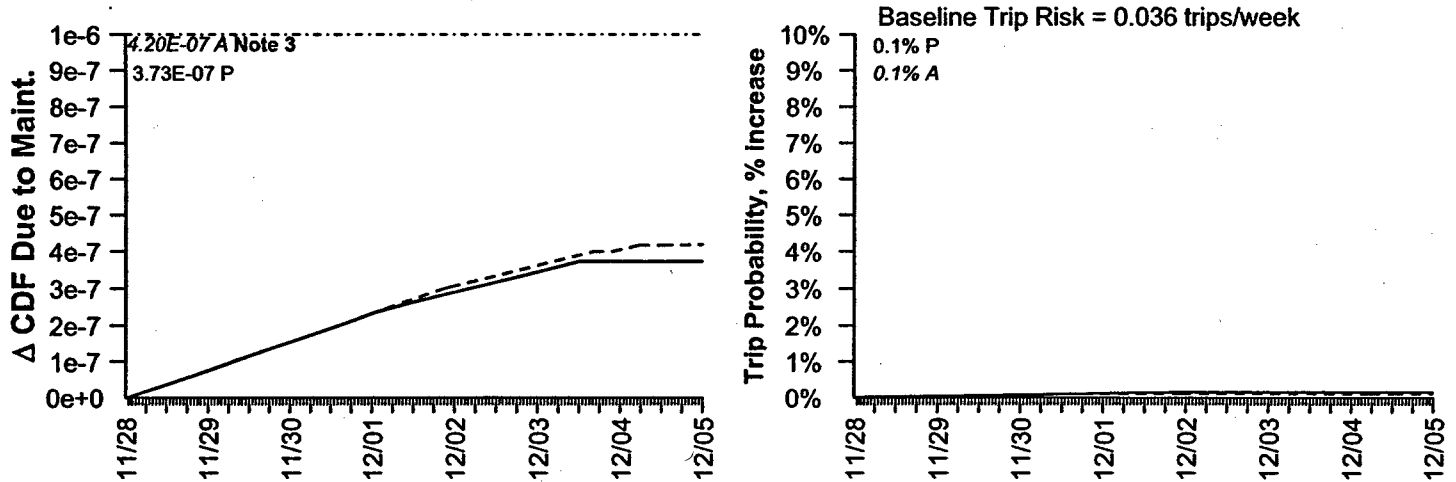


PRA Component	Planned Time Non-Functional	Planned Time Functional	Duration (hh:mm)	Actual Time Non-Functional	Actual Time Functional	Duration (hh:mm)
CHA NOTE 1	N/A	N/A	N/A	12/01/2005 07:40	12/02/2005 05:45	022:05
PZPRVB	11/30/2005 07:00	11/30/2005 10:00	003:00	11/30/2005 06:25	11/30/2005 15:20	008:55
BOP Component	Planned Time Non-Functional	Planned Time Functional	Duration (hh:mm)	Actual Time Non-Functional	Actual Time Functional	Duration (hh:mm)
CAR11/21	N/A	N/A	N/A	11/28/2005 22:00	11/29/2005 04:24	006:24
NOTE 2						

NOTE 1 – Essential chiller 12A tripped. CR# 05-15756

NOTE 2 – CARS pump cooling water temperature control valve failed. CR# 05-15612.

Actual Risk Profiles for Unit 2 Week of 11/28/2005



PRA Component	Planned Time Non-Functional	Planned Time Functional	Duration (hh:mm)	Actual Time Non-Functional	Actual Time Functional	Duration (hh:mm)
CCA	11/28/2005 03:00	12/01/2005 01:00	070:00	11/28/2005 01:00	12/01/2005 20:15	091:15
CHA Note 1	N/A	N/A	N/A	12/04/2005 12:15	12/05/2005 00:00	011:45
CHA	11/28/2005 00:00	12/01/2005 12:00	084:00	11/28/2005 00:00	12/01/2005 22:39	094:39
DGA Note 2	N/A	N/A	N/A	12/03/2005 21:26	12/04/2005 05:27	008:01
DGA	11/28/2005 01:00	12/03/2005 12:00	131:00	11/28/2005 01:00	12/03/2005 16:09	135:09
EWA	11/28/2005 01:00	12/01/2005 01:00	072:00	11/28/2005 01:00	12/01/2005 20:15	091:15
BOP Component	Planned Time Non-Functional	Planned Time Functional	Duration (hh:mm)	Actual Time Non-Functional	Actual Time Functional	Duration (hh:mm)
AC13/23	11/30/2005 07:00	11/30/2005 09:00	002:00	11/30/2005 17:45	11/30/2005 18:00	000:15
CAR13/23	11/28/2005 03:00	12/01/2005 21:00	090:00	11/28/2005 04:00	11/30/2005 11:20	055:20

Note 1 – Essential chiller 22A has excessive excess purge, hi discharge pressure and abnormal vibrations. CR# 05-15864.

Note 2 – DG 21 declared functional after EAOT PMT commenced. The DG is declared non-functional for scheduled governor oil change after PMT run. Original Risk profile did not declare functionality between these two maintenance states.

Note 3 – DG 21 exceeded it's planned out of service time due to expanded scope of maintenance (multiple WAN's). EW, CH, and CC exceeded their out of service time due to expanded scope of maintenance on EW-0019 (WAN 195735) and EW-0016 (WAN 195734).

STP RITS

RAI Response Discussion Summary

Question	Telecon Date	Discussion Notes	STP Follow-up Action
1	10/11/05, 10/17/05	Response acceptable.	
2	10/27/05	STP doesn't credit operator actions for functionality when calculating RICTs. For calculation of Maint. Rule a(4) functionality, operator action is credited in accordance with the guidelines of NUMARC 93-01. RICTs are based on inoperability, even though may be functional per MR.	Need to revise to state "never will be credited" unless in PRA.
3a	10/11/05, 10/17/05	Staff asked whether consistent with GL 91-18.	STP will confirm determination of operability is consistent with GL 91-18. Additionally, STP will recommend EPRI RMTS guidance document be revised to reflect GL 91-18.
3b	10/17/05	See 3a above.	
3c	10/17/05	Need to revise our response to clarify. Answer is not really "no."	STP response will be revised to state that if the operability determination identifies the same degraded or non-conforming condition exists in the redundant train components, they will be declared inoperable.
3d	10/17/05	STP needs to look at context to see if we need to revise RAI response.	STP will change "components" to "component failure modes." STP will clarify that insights are not used in calculation of RICTs.
3e	10/17/05	Response acceptable. No additional information needed.	STPNOC will recommend revising the RMTS Guidance to reflect that failure rates need not be adjusted for a single failure.
3f	10/17/05	Response acceptable. No additional information needed.	STP will revise response to more emphatically state that approved TS will require action when threshold exceeded.
4	10/11/05,	Need additional information.	Need additional discussion

STP RITS

RAI Response Discussion Summary

Question	Telecon Date	Discussion Notes	STP Follow-up Action
	10/17/05		with NRC regarding whether staff wants to review results of Level 2 update.
5	10/17/05	Discussed controls on what actions should be taken if exceed 1 E-6 threshold. Actions need "more teeth." Will address "residual functionality." Controls could be put in to place to document occurrences, including corrective actions and notification to plant management. Also need to clarify use of RICTs for multiple equipment in TS LCOs, and "planned" vs "emergent" thresholds.	Need additional discussion with NRC regarding planned vs. emergent exceedance of 1 E-6 threshold.
6	10/17/05	Need to send augmented Table 2 that shows / discuss asymmetries.	STP to revise Table 2 as stated. (Meeting discussion topic)
7	10/17/05	Response acceptable. No additional information needed.	STP will provide risk calculation program demonstration.
8a	10/11/05, 10/17/05	Discussed possible use of SFDP-like tool, which evaluates whether function is lost. Can proposed Initiative 6 changes be used? Discussed concept of "residual functionality."	STP proposes revised TS 3.13.1 and 3.13.2, and Bases.
8b	10/11/05, 10/17/05	Staff asked whether PRA modeled all TS functions.	STP to identify where PRA does not model specific TS functions. STP will provide example Safety Injection system table at meeting.
8c	10/17/05	Need to identify / clarify functionality vs. operability. Discussed that CRMP is oriented towards a(4), and not always compatible with RICTs. Need to clarify how these would differ.	STP to provide requested clarifications. STP will tie answers to 8c with answer to 8a.
9	10/17/05	No discussion. Placekeeper - refers to RAI questions 25 through 38.	
10a	10/27/05	As stated, STP will remove RTBs from submittal.	STP to remove TS 3.3.1 Unit 20 from scope of application.
10b	10/27/05	Will discuss at December meeting.	

STP RITS

RAI Response Discussion Summary

Question	Telecon Date	Discussion Notes	STP Follow-up Action
10c	10/27/05	Will discuss at December meeting.	
10d	10/27/05	Will discuss at December meeting.	
11	10/27/05	STP does model cooldown transition (Steam Line Breaks), but small contribution.	STP to confirm Main Feedwater Isolation Valves (MFIVs) are only TS equipment not modeled.
12a	10/27/05	As stated, STP will remove subject TS from submittal.	STP will remove PZR safeties from submittal.
12b	10/27/05	Response acceptable. No additional information needed.	
12c	10/27/05	Response acceptable. No additional information needed.	
13	10/27/05	Response acceptable. No additional information needed.	
14a	10/27/05	Response acceptable. No additional information needed.	
14b	10/27/05	If outside boron limits, then non-functional and therefore inoperable.	
15	10/27/05	Need to change "and" to "or."	STP will make wording change.
16	10/27/05	RCFCs are credited if containment is intact. This is a plant-specific calculation. No further information needed.	
17	10/27/05	STP will adjust wording to agree with NRC comment. STP will look at MFIVs.	STP will make wording changes. Also see Question 11 follow-up action above.
18	10/27/05	Model assumes normal summer conditions throughout year. Coolers are modeled with associated system functions.	
19	10/27/05, 12/07/05	Response acceptable. No additional information needed.	
20	10/27/05, 12/07/05	TS 3.13.2 would replace TS 3.8.1.1.d. Typo in ACTION. RAI response states "OPERABLE status within or..." Should state "OPERABLE status within the calculated Allowed Outage Time or..." NRC to look at further.	STP to correct wording.
21	10/27/05, 12/07/05	If inoperable, will be included in RICT. NRC to look at this further.	Will be shown in program demonstration.
22	10/27/05	Will discuss further at December	

STP RITS

RAI Response Discussion Summary

Question	Telecon Date	Discussion Notes	STP Follow-up Action
		meeting.	
23	10/27/05, 12/07/05	<p>STP will propose Note in TS 3.8.2.1 to restrict use of TS 3.13.1. See Attachment 1.</p> <p>Reviewer requested that response be revised to include additional information regarding Channel II and IV batteries.</p> <p>Reviewer asked for additional clarification on cross-train feed procedures.</p>	<p>STP will propose Note in TS 3.8.2.1 to restrict use of TS 3.13.1.</p> <p>STP will revise response to RAI 23 to remove channel-specific information.</p> <p>STP will bring cross-train feed procedures to meeting.</p>
24	10/17/05	RG 1.200 requirements are met by current model. Following completion of Rev. 5, then will have resources to provide detailed answers on how we comply.	STP will provide detailed response.
25	10/17/05	<p>'A's and 'B's will be signed off as part of Rev. 5. Will do peer review w.r.t HRA methodology. Won't be able to answer fully until final report.</p> <p>Individual Table 1 items discussed:</p> <p>EH-05 Need to provide more detailed answer.</p> <p>DE-09 Discussed whether 1 E-7 screening criteria is small enough.</p> <p>QU-03 NRC will evaluate when Rev. 5 completed.</p> <p>L2-06 Need to provide more detail.</p>	STP to provide additional detail as discussed.
26	10/17/05	Key sources of uncertainty / key assumptions will be included in Rev. 5 update.	STP expects will provide first quarter of 2006.
27	10/17/05	RG 1.200 Self-Assessment will be submitted.	Need to discuss NRC expectations for documentation.
28	10/17/05	Documentation will be upgraded	Need to discuss NRC

STP RITS RAI Response Discussion Summary

Question	Telecon Date	Discussion Notes	STP Follow-up Action
		as part of Rev. 5 documentation.	expectations for documentation.
29	10/17/05	Will be provided following completion of Rev. 5	
30a	10/17/05	No additional information requested.	
30b	10/17/05	Not an issue for STP.	
30c	10/17/05	STP model automatically adjusts for maintenance impact.	
30d	10/17/05	No initiator frequency adjustments.	
30e	10/17/05	Seasonal adjustments not used in STP model - use summer for entire year.	
30f	10/17/05	Need additional information regarding how equipment repair is credited.	Response will be revised to state that STP's PRA model does not take credit repair of out-of-service equipment as a recovery action for configuration risk calculations. There is limited credit for repair of standby diesel generator failures after an initiating event.
31a	10/17/05	Being addressed in Level 2 PRA update, currently in progress.	Response will be provided upon completion of update.
31b	10/17/05	Being addressed in Level 2 PRA update, currently in progress.	Response will be provided upon completion of update.
31c	10/17/05	Being addressed in Level 2 PRA update, currently in progress.	Response will be provided upon completion of update.
31d	10/17/05	Being addressed in Level 2 PRA update, currently in progress.	Response will be provided upon completion of update.
31e	10/17/05	Being addressed in Level 2 PRA update, currently in progress.	Response will be provided upon completion of update.
31f	10/17/05	Being addressed in Level 2 PRA update, currently in progress.	Response will be provided upon completion of update.
32a	12/07/05	Reviewer questioned how 3.13.1 would apply in case of excessive battery discharge.	Additional note to 3.13.1 has been proposed which addresses use for batteries. STP will bring referenced procedures to meeting.
32b		No additional Reviewer comments at this time. Will discuss at meeting as needed.	
32c		No additional Reviewer comments at this time. Will discuss at meeting as needed.	

STP RITS **RAI Response Discussion Summary**

Question	Telecon Date	Discussion Notes	STP Follow-up Action
33a	12/07/05	Reviewer asked about procedural controls which address degraded DC power.	STP will bring procedures for response to degraded DC bus and station blackout.
33b		No additional Reviewer comments at this time. Will discuss at meeting as needed.	
33c		No additional Reviewer comments at this time. Will discuss at meeting as needed.	
33d		No additional Reviewer comments at this time. Will discuss at meeting as needed.	
34a	12/08/05	Refer to Attachment 1 General Comments.	Need to discuss possible regulatory commitment to stabilize plant. Should statement be added to RM guidance document? STP will add discussion to 34a response regarding STP's 7-day train-specific work weeks, and that STP does not typically plan for work to extend into the following work week.
34b	12/08/05	Reviewer would like to discuss further how risk profile information is maintained and how 3.13.1 entries will be documented.	STP will bring example information showing how electrical TS entries which affected RASCAL are tracked.
34c		No additional Reviewer comments at this time. Will discuss at meeting as needed.	
35		No additional Reviewer comments at this time. Will discuss at meeting as needed.	
36a		No additional Reviewer comments at this time. Will discuss at meeting as needed.	
36b		No additional Reviewer comments at this time. Will discuss at meeting as needed.	
36c	12/08/05	Discussed independence of loss-of-power instrumentation & how possible common cause issues would be addressed. Also	Refer to 8a response. STP will add detail to 36c response which clarifies that TS 3.0.4 would prevent mode

STP RITS **RAI Response Discussion Summary**

Question	Telecon Date	Discussion Notes	STP Follow-up Action
		discussed use of TS 3.13.1 for an inoperable SDG and mode changes.	change with an inoperable SDG.
37		No additional Reviewer comments at this time. Will discuss at meeting as needed.	
38		No additional Reviewer comments at this time. Will discuss at meeting as needed.	
39		No additional Reviewer comments at this time. Will discuss at meeting as needed.	
40		No additional Reviewer comments at this time. Will discuss at meeting as needed.	
41	10/27/05	No additional information requested.	
42a	10/27/05	Discussed that times are driven by TS. If AOT is a few days, can calculate ahead of time; if shorter, can calculate quickly. No additional information requested.	STP will discuss proposed wording for TS 3.13.1 Actions at meeting.
42b	10/27/05	Similar. Driven by TS. No further info needed.	Need to discuss further with industry.
43a	10/27/05	STP believes current tools support timely calculation capability. If RICT not calculated, then will use TS limit.	
43b	10/27/05	Don't believe so, but if they do exist, can promptly calculate prior. Typically, 20 to 25 minutes to perform calc.	
44	10/27/05	No new TS. Standard types of compensatory measures have been developed already, but are not tied to specific TS. STP's process for developing/applying compensatory measures has been proceduralized. NRC may look at this further when do plant visit.	
45	10/27/05	Table 2 shows that not all short duration AOTs are high-risk. STP will discuss this in detail at meeting. NRC will look at on a case-by-case basis. NRC will	STP to address loss of function in revised 3.13.1, 3.13.2 (refer to Question 8a).

STP RITS **RAI Response Discussion Summary**

Question	Telecon Date	Discussion Notes	STP Follow-up Action
		evaluate possible ties to Industry Initiative 6.	
46	10/27/05	Response acceptable. No additional information needed.	
Attach 1	12/07/05	General Comments - Discussed that "de-energized bus" refers to DC power.	
Attach 1	12/07/05	3.8.1.1 Action a - Att 1 states that Action a can be entered for either planned or emergent work. Reviewer asked for details on how 3.8.1.1.a entry is made for planned maintenance. Reviewer asked if compensatory measures are pre-defined.	
Attach 1	12/07/05	3.8.1.1.e - Discussed how 72-hr action in 3.8.1.1.e is redundant with actions of 3.8.1.1.a.	
Attach 1	12/07/05	3.8.2.1 - Reviewer requested example risk results for multiple batteries inoperable and that battery charger design information be brought to meeting.	STP will bring requested information to meeting.

STP RITS Proposed Schedule

Action	Date	Who
RAI w/o PRA	Mid-January	STP
Submit revised RMTS and RAI responses	Mid-January	EPRI & NEI
RAI PRA and Table 2 <ul style="list-style-type: none"> • Q 24 - Fire / External Events • Q 25 - F&O Status • Q 26 - Key uncertainties • Q 27 - Capability Categories • Q 28 - PRA Documentation • Q 29 - Common Cause Failure Modes • Q 30 - Changes to Baseline • Q 31 - Level 2 Update 	March 6	STP
Revised application	May 30	STP
NRC site visit	March - April	NRC
NRC STP SE	June 30	NRC
NRC RMTS SE (?) (How will this be endorsed?)	June 30	NRC
Amendment Issued	July	NRC

Questions and exposures:

- ACRS before SE and amendment
- Follow-up meeting(s) with NRC
- Additional RAIs