MSPI WEBCAST

MSPI Implementation Issues How to Handle Errors

Overview

This training is about how to handle ERRORS not CHANGES:

- <u>Errors</u> need to be corrected promptly per NEI 99-02R4:
 - If a color is affected, correct immediately
 - If a color is not affected, correct as part of next submittal
- Changes that affect MSPI take effect the subsequent quarter
- Interpretations of NEI 99-02R4 guidance should use the FAQ process for resolution

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Why is there an issue with this first submittal?

- NEI 99-02R4, Page 3, provides clear guidance on correcting previously submitted data.
- For MSPI, there is no "previously submitted data" for 2Q06 only the MSPI Basis Documents posted on NEI Website on April 1, 2006
- What happens if <u>errors</u> are identified in the MSPI Basis Document between April 1, 2006 and the first submittal on July 21, 2006?

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What is an Error

- Transcription errors
- Calculation errors
- Guidance Misapplication errors

What is an Error?

- Transcription errors (Source document correct)
 - Incorrectly transferring data from PRA
 - Incorrectly transferring data from planned baseline
 - Incorrectly transferring performance data
 - -Unavailability (i.e., outage times, etc.)
 - -Unreliability (i.e., demands, failures, etc.)
 - Incorrectly entering data into CDE/INPO Calculator

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What is an Error?

- Calculation errors (Source document incorrect)
 - · Incorrectly tabulating baseline unavailability
 - Incorrectly calculating PRA inputs (i.e., FV values, common cause factors, etc.)
 - Incorrectly calculating performance (i.e., demands, unavailability hours, etc.)

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What is an Error?

- Guidance Misapplication (Failure to Properly Follow NEI 99-02R4)
 - Incorrectly excluding or including hours in the baseline unavailability
 - Incorrectly scoping components in or out
 - Not following guidance when calculating FV/UA, FV/UR, etc.

What is NOT an Error?

- Revisions to PRA model issued after the start of the reporting quarter (i.e., after April 1, 2006) that affect MSPI
- Revisions to plant maintenance practices after the start of the reporting quarter (i.e., after April 1, 2006) that affect MSPI
- Revisions to plant procedures or plant design after the start of the reporting quarter (i.e., after April 1, 2006) that affect MSPI

THESE <u>CHANGES/REVISIONS</u> TO SOURCE DOCUMENTS TAKE EFFECT THE QUARTER FOLLOWING THE REVISIONS!

[i.e., 3Q06]

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How to Fix Errors for the 2Q2006 Submittal

- 1. Revise the MSPI Basis Document and correctly enter data into CDE
- 2. Consider entering error into the plant Corrective Action Program
- 3. Provide specifics of correction to NEI (John Butler, jcb@nei.org)
- 4. It is recommended that you brief your Resident Inspector
- 5. Annotate that an error has been corrected in the comment section of the affected MSPI for the 2Q06 submittal

The existing NEI 99-02R4 guidance on correction of errors should be followed in all future submittals.

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Other Considerations

- 10 CFR 50.5 and 50.9
- Unique situations not covered in this presentation
 - Email specifics to NEI

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