

**PWROG/NRC Meeting
to Discuss the Model Safety
Evaluation for TSTF-409, R2**

July 25, 2006

Model Safety Evaluation for TSTF-409, Rev. 2

Agenda

- Background
- Comments on Model SE for TSTF-409 Rev. 2
- Recommendations
- Summary and Conclusions

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Background

- Topical Report (TR) CE-NPSD-1045 submitted to NRC in April 1998
- Provided justification for extending the Completion Time (CT) for one inoperable Containment Spray System (CSS) train from 72 hours to 7 days
- Joint Application Report (JAR) that included plant specific PRA results for all CE plants

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Background (cont.)

- CSS chosen as a Joint Application AOT because:
 - Little impact on other systems
 - Low risk at most CE PWRs
 - Little if any external event risks

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Background (cont.)

- TR approved by the NRC on December 21, 1999
- Conclusions of the Safety Evaluation
 - Proposed CSS CT has a minimal quantitative impact on plant risk
 - Licensee submittals shall discuss implementation of procedures that prohibit entry into an extended CSS CT for scheduled maintenance if external event warnings are in effect
 - Licensee procedures will also include compensatory measures and normal plant practices that help avoid potentially high risk configurations

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Background (cont.)

- Conclusions of the Safety Evaluation
 - Licensee submittals shall describe a risk-informed configuration management program to assess the risk associated with the removal of equipment from service
 - The staff finds that if the above are provided by the licensee, the PRA insights provided support the proposed CSS CT extension except for one plant (which provided no data into the JAR)

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Comments on Model Safety Evaluation for TSTF-409, Rev. 2

- At time of application no formal PRA standard was available
- JAR results used “best practices” PRA models and demonstrated consistency of risk predictions for a range of similar plants
- JAR approach addresses modeling variations and uncertainty and understanding of those variations
- NRC concluded that models were adequate for the application. However, in light of advances in PRA quality of the past several years requests for results of peer reviews and subsequent resolution of relevant findings (as they relate to the CSS) are appropriate.

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Recommendations

- CLIIP should only require confirmation or update of the PRA results contained in the TR
- CLIIP should only require the status of the PRA update versus that one used to produce the results in the TR
- Peer Review F&Os that could impact the submittal and resolution of the F&Os

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Recommendations (cont.)

- Any revised PRA results due to the above
- A discussion of why External Events do not impact the submittal
- A description as to why the CRMP satisfies Regulatory Guide 1.177 Section 2.3.7.2
- Not require the IPE/IPEEE history

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Summary and Conclusions

- CLIIP PRA requirements should focus on the specific change to the CSS CT and NRC approved TR for the change
- CLIIP PRA requirements should be consistent with the TR and commensurate with the risk and complexity of the submittal
- CLIIP for the CSS CT change should not address general PRA requirement guidance for any risk-informed submittal