

NRCREP - Notice of Opportunity to Comment on Model Safety Evaluation

From: "BRADLEY, Biff" <reb@nei.org>  
Date: 12/20/2007 4:31:45 PM  
Subject: Notice of Opportunity to Comment on Model Safety Evaluation

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72FR 65615

(1)

Chief, Rules and Directives Branch  
Division of Administrative Services  
Office of Administration  
Mail Stop: T-6 D59  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** Notice of Opportunity to Comment on Model Safety Evaluation on Technical Specification Improvement for B&W Reactor Plants To Risk-Inform Requirements Regarding Selected Required Action End-States Using the Consolidated Line Item Improvement Process (CLIIP) (72 Federal Register 65615, November 21, 2007)

**Project Number: 689**

The Nuclear Energy Institute (NEI) provides the following comments on the subject *Federal Register* Notice.

1. Section 2.0: Two references to 10 CFR 50.36(c) now should be 10 CFR 50.36(d) based on new NRC rule change dated August 28, 2007.
2. Section 3.1 Risk Assessment: under Tier 3 bullet for Configuration Risk Management: Paragraph reads, "In addition, to the extent that the plant PRA is utilized in the CRMP, the plant PRA quality will be assessed in accordance with NRC Regulatory Issue Summary 2007-06, "Regulatory Guide 1.200 Implementation," (Reference 11)." Nowhere in the implementation guidance document (TSTF-IG-07-01) or in BAW-2441A Revision 2, does it address PRA technical adequacy or RG 1.200. RIS 2007-06 was issued to inform addressees of how the NRC will implement its technical adequacy review of plant specific probabilistic risk assessments (PRAs) used to support risk-informed licensing actions after the issuance of Regulatory Guide (RG) 1.200. It is not clear what this statement means since 10 CFR 50.65(a)(4) can use a qualitative, quantitative, or blended approach. This could be incorrectly construed to mean that the on-line PRA tool must meet RG 1.200 before adopting this CLIIP.
3. The detailed write-up section on TS 3.8.7 Inverters-Operating (page 65615 of the Model Safety Evaluation does list Inverters-Operable as one of the affected TS), is missing from the Model Safety Evaluation. It looks as if it should be Section 3.2.18 (and 3.2.18 be relabeled as 3.2.19).
4. Page 65627 just after the references: first sentence of the example application has a typo in it. "In accordance with **the**" provisions..."

Please contact me if you have any questions.

Biff Bradley

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**Security:** Standard

Director, Risk Assessment

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NUCLEAR ENERGY INSTITUTE

**Biff Bradley**  
DIRECTOR  
RISK ASSESSMENT  
NUCLEAR GENERATION DIVISION

December 20, 2007

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<sup>1</sup> NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry, including regulatory aspects of generic operational and technical issues. NEI members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, materials licensees, and other organizations and individuals involved in the nuclear energy industry.

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Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Biff", followed by a stylized flourish or underline.

Biff Bradley

c: Mr. Carl S. Schulten, NRC  
Mr. Timothy J. Kobetz, NRC  
NRC Document Control Desk