

# Harris Nuclear Plant NFPA 805 Transition License Amendment Request / Transition Report

Jeff Ertman, Progress Energy  
January 7, 2008 Raleigh, NC



# HNP LAR / Transition Report

---

- Focus on Submittal
- Outline of LAR / Transition Report Specifically focus on issues requiring resolution
- Contents of SER

# Transition Report / LAR Focus on Submittal?

---

- What level of detail is necessary in the LAR and Transition Report?
  - ▶ Will the Transition Report be an attachment, enclosure, submittal, etc.? Using NEI 06-02 as a model, the Transition Report could be used to document all supporting information
  - ▶ What information, if any, needs to be duplicated in both the LAR and Transition Report?
- How does the previous Licensing Basis get superseded (any key differences between pre and post-1979 plants i.e., exemption/SER vs. deviation/SER?).
- What information from the LAR and Transition Report will become 'living documents' (e.g., FSA, UFSAR, etc.)? And how will that be conveyed to inspectors post transition?

# LAR / Transition Report (TR) Submittal Topics

---

- FP License Condition
- Other License Condition
- Technical Specifications
- Orders & Exemptions
- Use of RI-PB Methods for NFPA 805 Ch. 3 Compliance 10 CFR 50.48(c)(2)(vii)
- Use of RI-PB Alternatives 10 CFR 50.48(c)(4) (non-NFPA 805 methods)
- Risk Impact for Transition
- UFSAR Changes
- Modifications

# LAR / Transition Report (TR) Submittal Topics Continued

---

- Clarification of Prior NRC Approvals
- EEEEs
- Circuit Analysis Methodology (MSO Resolution)
- OMA transition to Recovery Actions
- Power Block Definition
- No Significant Hazards Consideration Finding
- Categorical Exclusion Finding
- Role of the FAQs
- FPRA Review High Level Findings and Resolutions
- Transition Schedule

# FP License Condition (TR Attachment M)

---

- Content
  - ▶ Standard License Condition from RG 1.205
  - ▶ Supplemented by FAQ 06-0008 Info
- Process
  - ▶ Request Replacement of current license condition with RG 1.205 license condition as modified by FAQ 06-008
- Issues Requiring Resolution
  - ▶ Should we combine the revocation/replacement of the standard fire protection license into Attachment A? Attachment B would address 'other' license conditions.
  - ▶ How do we ensure that "All prior fire protection SERs and commitments are superceded" by the issuance of the new license condition?

# FP License Condition (TR Attachment M)

---

## ● Suggested Resolution

- ▶ List all SER Sections that contain fire protection commitments in the Transition Report Section 2.1
- ▶ List all the submittals made to support those SERs in the Transition Report Section 2.2
- ▶ Since this represents the ‘approved fire protection program’ any other commitments can clearly be superseded by this new license condition and do not need to be individually listed.
- ▶ Any ‘prior approvals’ necessary will be documented in the Transition Tables (B-1, B-2, B-3, etc) with enough information to be stand alone and therefore the previous documentation can be superseded.

# Other License Conditions (TR Attachment M)

---

- Content
  - ▶ Currently no other license conditions require revocation/revision
- Process
  - ▶ Review Operating License for any other conditions that may require revision or revocation
  - ▶ Request revocation / revision of other license conditions
- Issues Requiring Resolution
  - ▶ None



# Technical Specifications (TR Attachment N)

---

- Content
  - ▶ All administrative / audit technical specifications should be revoked
  - ▶ Remaining 'equipment' technical specifications should be revised as necessary to ensure they are consistent with 10 CFR 50.48(c)
- Process
  - ▶ Review Tech Specs / Bases for fire protection related items, for example:
    - ◆ Administrative Requirements
    - ◆ Remote Shutdown
    - ◆ FP Audits
  - ▶ Request revocation of FP Audits and Administrative Requirements since these are requirements of 10 CFR 50.48(c)
  - ▶ Revision to Tech Spec Bases for Remote Shutdown Capability can be changed using 10 CFR 50.59 process
- Issues Requiring Resolution
  - ▶ NRC concurrence with plans for technical specification revisions

# Orders & Exemptions (TR Attachment O)

---

- Content
  - ▶ All orders and exemptions should be revoked
  - ▶ Remaining 'equipment' technical specifications should be revised as necessary to ensure they are consistent with 10 CFR 50.48(c)
- Process
  - ▶ Review orders and exemptions for fire protection
  - ▶ Request revocation of orders / exemptions
- Issues Requiring Resolution
  - ▶ How do we address Security Orders?

# No Significant Hazards (TR Attachment U)

---

- Content
  - ▶ Evaluation that shows the LAR involves no significant hazards
- Process
  - ▶ 10 CFR 50.91
- Issues Requiring Resolution
  - ▶ None.

# Environmental Considerations (TR Attachment V)

---

- Content
  - ▶ Evaluation that shows that the LAR meets the criteria for categorical exclusion
- Process
  - ▶ 10 CFR 50.22(b) and (c)
- Issues Requiring Resolution
  - ▶ None

# RI-PB NFPA 805 Chapter 3 Method (TR Attachment P)

---

- Content
  - ▶ FAQ 06-0008 Methodology
- Process
  - ▶ Provided in accordance with 10 CFR 50.48(c)(2)(vii)
- Issues Requiring Resolution
  - ▶ None

# RI-PB NFPA 805 Alternatives (TR Attachment Q)

---

- Content
  - ▶ Provide alternatives to those of NFPA 805
  - ▶ Neither Pilots will request alternatives
- Process
  - ▶ Provided in accordance with 10 CFR 50.48(c)(4)
- Issues Requiring Resolution
  - ▶ None

# FP Changes & Risk Impact (TR Section 4.5)

---

- Content
  - ▶ Current variances with the deterministic fire protection requirements which will meet the NFPA 805 performance based approach (Change evaluations)
  - ▶ Estimated  $\Delta$  Risk associated with transition (one number per RG 1.174)
    - ◆ The breakdown is as follows (available in site documentation)
      - ▼ current variances
      - ▼ Modifications to meet performance based requirements
      - ▼ Modifications to meet deterministic requirements
      - ▼ Modifications/plant features not FP related that offset risk when included in the FP program
- Process
  - ▶ RG 1.205 Position C.2.2
  - ▶ NEI 04-02 Section 4.5
- Issues Requiring Resolution
  - ▶ Concurrence with proposed content

# Proposed UFSAR Changes (TR Attachment R)

---

- Content
  - ▶ See Duke slides
- Process
  - ▶ UFSAR change discussion recommended by NEI 04-02 (4.6.1)
  - ▶ Process governed by 10 CFR 50.71(e)
- Issues Requiring Resolution
  - ▶ None



# Modifications (TR Attachment R)

---

- Content
  - ▶ Listing of plant modifications necessary to support the new FP licensing basis
  - ▶ Schedule for implementation
- Process
  - ▶ Modification listing/description recommended by NEI 04-02 (4.6.1)
- Issues Requiring Resolution
  - ▶ None

# Clarification of Prior NRC Approvals (TR Attachment T)

---

- Content
  - ▶ Listing of issues for which previous NRC approval is unclear
  - ▶ NEI 04-02 B-1, B-2, B-3 Tables
- Process
  - ▶ Clarification discussed in NEI 04-02 (2.3, B.2) and RG 1.205 (C.2.2)
- Issues Requiring Resolution
  - ▶ None

# Engineering Equivalency Evaluations (TR Attachment J)

---

- Content
  - ▶ Listing of Engineering Equivalency Evaluations for fire protection features that do not meet the requirements of NFPA 805
- Process
  - ▶ RG 1.205 Position C.2.3
- Issues Requiring Resolution
  - ▶ FAQ 07-0033
  - ▶ Concurrence on content

# MSO Resolution (TR Attachment F)

---

- Content
  - ▶ FAQ 07-0038 method
  - ▶ Results will be part of fire area summaries and change evaluations as necessary
  - ▶ Expert Panel results will be part of long term compliance documentation available on site
- Process
  - ▶ MSO resolution discussed in NEI 04-02 (B.2) and RG 1.205 (C.3.3)
- Issues Requiring Resolution
  - ▶ FAQ 07-0038
  - ▶ Concurrence on content

# OMA Transition to Recovery Actions (TR Attachment G)

---

- Content
  - ▶ Assumptions, criteria, methodology, and overall results of the operator manual action transition to recovery actions
- Process
  - ▶ OMA resolution discussed in NEI 04-02 (B.2) and RG 1.205 (C.2.3)
  - ▶ Additional considerations from FAQ 06-0012, FAQ 06-0011, & FAQ 07-0030 will be included
- Issues Requiring Resolution
  - ▶ FAQ 07-0030
  - ▶ Concurrence on content

# Frequently Asked Questions (FAQs) (TR Attachment H)

---

- Content
  - ▶ Intended to provide clear definition of FAQs used as input for LAR
- Process
  - ▶ List
- Issues Requiring Resolution
  - ▶ None

# Fire PRA – High Level Findings (TR Section 4.5.1)

---

- NRC FPRA review addressed in RG 1.205 (C.4.3)
- NRC review high level findings and schedule for completion to be provided (LAR, Att. Q)

# NFPA 805 Implementation (TR Section 5.0)

---

- Content
  - Post Transition Documentation Roadmap
  - Implementation Schedule
    - ◆ Fire PRA Update (establishes baseline)
    - ◆ New Program Implementation
    - ◆ Completion of NFPA 805 Modifications
- Process
- Issues Requiring Resolution
  - None



# Regulatory Evaluation (TR Section 6.0)

---

- See attachment

# Contents of SER

---

- Specific approval of Transition Report Tables
- Specific approval of implementation schedule
- Other specific issues requiring approval
  - ▶ Change evaluations that meet FP license condition threshold