PMComanchePeakPEm Resource

From: Stephen Monarque
Sent: Tuesday, March 10, 2009 1:07 PM
To: ComanchePeakCOL Resource
Subject: FW: 2009-02-19 Feb 18 NRC meeting - Implementation of Risk Metrics for Risk Informed Activities and Impact on CPNPP

From: Donald.Woodlan@luminant.com [mailto:Donald.Woodlan@luminant.com]
Sent: Thursday, February 19, 2009 9:56 AM
To: Stephen Monarque
Cc: sherry_bernhoft@mnes-us.com; ck_paulson@mnes-us.com; John.Conly@luminant.com; joseph_tapia@mnes-us.com; katsunori_kawai@mhi.co.jp; keiko_chitose@mnes-us.com; masanori_onozuka@mnes-us.com; ryan_sprengel@mnes-us.com; rbird1@luminant.com; Richard.Brabec@luminant.com; Dennis.Buschbaum@luminant.com; John.Conly@luminant.com; Matthew.Weeks@luminant.com; Michael Norato; Paul Kallan; Stephanie Coffin; Jeff Ciocco; reb@nei.org; jairus_greene@mnes-us.com; Timothy.Clouser@luminant.com
Subject: RE: 2009-02-19 Feb 18 NRC meeting - Implementation of Risk Metrics for Risk Informed Activities and Impact on CPNPP

Thanks for the update Steve. I like your suggestion and agree that we should attend the next meeting. We will be linking up with Biff to ensure we are aware of what is going on.

Your aggressive and rapid responses are truly appreciated.

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From: Stephen Monarque [mailto:Stephen.Monarque@nrc.gov]
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Cc: sherry_bernhoft@mnes-us.com; ck_paulson@mnes-us.com; Conly, John; joseph_tapia@mnes-us.com; katsunori_kawai@mhi.co.jp; keiko_chitose@mnes-us.com; masanori_onozuka@mnes-us.com; ryan_sprengel@mnes-us.com; Bird, Bobby; Brabec, John; Buschbaum, Denny; Conly, John; Weeks, Matthew; Michael Norato; Paul Kallan; Stephanie Coffin; Jeff Ciocco
Subject: RE: 2009-02-19 Feb 18 NRC meeting - Implementation of Risk Metrics for Risk Informed Activities and Impact on CPNPP

Don,

Biff Bradley of NEI is coordinating the industry's response to the NRC staff's white paper on risk metrics.

Regarding yesterday's presentation on the Path Forward, the NRC staff will be conducting additional public meetings on this subject in order to acquire feedback from stakeholders. We are looking at April or May 2009 for the next meeting. I recommend that MHI, MNES, and Luminant attend these meetings. I realize they are generic industry meetings, but the subject of Comanche Peak COL will more than likely be brought up. I will also attend these meetings.

After obtaining stakeholder feedback, the staff will present its policy paper to ACRS, then seek Commission approval.

thanks,

Stephen Monarque
U. S. Nuclear Regulatory Commission
NRO/DNRL/NMIP
301-415-1544

From: Donald.Woodlan@luminant.com [mailto:Donald.Woodlan@luminant.com]
Sent: Thursday, February 19, 2009 7:43 AM
To: Stephen Monarque
Cc: sherry_bernhoft@mnes-us.com; Dennis.Buschbaum@luminant.com; ck_paulson@mnes-us.com; John.Conly@luminant.com; brock.degeyter@energyfutureholdings.com; joseph_tapia@mnes-us.com; katsunori_kawai@mhi.co.jp; kazuya_hayashi@mnes-us.com; keiko_chitose@mnes-us.com; Fred.Madden@luminant.com; masanori_onozuka@mnes-us.com; Bill.Moore@luminant.com; russell_bywater@mnes-us.com; ryan_sprengel@mnes-us.com; jeff.simmons@energyfutureholdings.com; sfrantz@morganlewis.com; Brett.Wiggs@energyfutureholdings.com; rbird1@luminant.com; Richard.Brabec@luminant.com; Dennis.Buschbaum@luminant.com; Ronald.Carver@luminant.com; Timothy.Clouser@luminant.com; John.Conly@luminant.com; Eric.Evans@luminant.com; Robert.Reible@luminant.com; Bruce.Turner@luminant.com; David.Volkening@luminant.com; Matthew.Weeks@luminant.com; David Matthews; Michael Norato
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Note the following extract from the NRC presentation material:

- Comanche Peak review schedule requires early resolution of evaluation of risk metrics: Proposed schedule for COL issuance is October
- Resolution of issues regarding risk metrics and possible revision of associated documents are potentially critical path tasks
- Based on schedule for resolution, Comanche Peak may need to decide whether to remove RICT and SFCP initiatives from proposed TS or accept a schedule delay

Steve, I would like to have had more of a warning of the impact of this meeting on CPSES. Mitsubishi attended because they are doing most of our PRA work but Luminant would have attended if we would have understood better the intent to discuss CPNPP directly. (We would have attended anyhow but most of our resources are tied up preparing for the Environment Site Audit next week.) It is also fairly disappointing that the NRC (including the commissioners themselves) have promoted more use of risk informed regulations by new plants and now the staff is saying if you use more risk informed regulations your COL will be delayed. I will be interested in seeing how the NRC deals with this shortcoming. It isn't like this is new, we have been on the record for a long time regarding risk informed technical specifications and have stated that we are more than willing to sit down with the staff and discuss the PRA challenges.

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Sent: Thursday, February 19, 2009 5:28 AM
To: Woodlan, Don; Conly, John
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Subject: Fw: Feb 18 NRC meeting / Implementation of Risk Metrics

Dear Mr. Woodlan,

I am forwarding email regarding the NRC public meeting held on Feb. 18 in which application of risk-informed tech-spec to CP 3&4 was referred.
As mentioned in forwarded email, we would like to discuss this issue in Monthly meeting on March 3 in Irving.

Best regards,
Kazuya Hayashi

----- Forwarded by kazuya hayashi/MHI on 02/19/2009 06:11 AM -----

masanori onozuka/MHI

02/19/2009 02:17 AM

To kazuya hayashi/MHI

cc joseph tapia/MHI, russell bywater/MHI, katsunori kawai/MHI, keiko chitose/MHI, atsushi kumaki/MHI, shinji kawanago/MHI, takafumi noda/MHI, etsuro saji/MHI, yoshiki ogata/MHI, masahiko kaneda/MHI, mutsumi ishida/MHI, takahiro imamura/MHI, katsuya kuroiwa/MHI, sherry bernhoft/MHI, shinji otani/MHI

Subject Fw: Feb 18 NRC meeting / Implemetation of Risk Metrics

Dear Hayashi-san,

I have put my thought together with Otani-san's input. Could you please send the below to Luminant, Mr. Woodlan.

To Luminant,

On Feb. 18, a public meeting to discuss "Implemetation of Risk Metrics for New Light-Water Reactor Risk-Informed Applications" was held. (See Attachment 1 and 2) MHI and MNES's representatives attended the meeting since we also attended a separate US-APWR PRA meeting with the NRC after this public meeting.

As found in Attachment 1, the meeting was more less directing to US-APWR DCD and CP2&4 COLA because of our application using Risk-Informed Tech Spec. However, we did neither have any pre-input to this meeting nor were prepared for the meeting. At the end, we felt that Luminant and MHI/MNES should have a separete meeting with the NRC on this topics. Note that one of the NRC members stated that the intention of the meeting was addressed to Steve Monarque. However, it seems that he did not inform Luminant of the meeting.

Therefore, we may consider having a next DCWG meeting to include this element. It may be best to discuss this topics in next week at CP.

Main outcome from this meeting is as follows:
During the meeting, the NRC noted that implementation of risk informed applications for new plants requires an explicit approval of methods such as documented in RG 1.174 and the Safety Goal for existing plants. One option which appears to be favored by industry is to adopt these without change for new plants. In the meeting this option was discussed along with other options. The chosen option could potentially affect our implementation. In the extreme case of an NRC decision to take much time to consider an alternative for new plants a schedule impact would occur unless we elected to withdraw our planned implementation of RITS. The NRC staff clearly does not want us to do this. They appear to be engaging in general discussion about this. At this time, there is no need to change out commitment or implementation. We will closely monitor this issue.

Best regards,

Masanori

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Hearing Identifier: ComanchePeak_COL_Public
Email Number: 138

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From: Stephen Monarque

Created By: Stephen.Monarque@nrc.gov

Recipients:
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