

Comanche Peak Schedule and Risk- Managed Technical Specification Requirements

Meeting with Luminant

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Comanche Peak Schedule and Technical Specification Requirements

- Proposed Comanche Peak (CP) Schedule is for COL to be Issued December 2011
- Technical Specifications (TS) shall be complete at COL issuance
- Proposed CP TS include Risk-informed (RI) TS initiatives on RI Completion Times (CT) and Surveillance Frequency Control Program (SFCP)

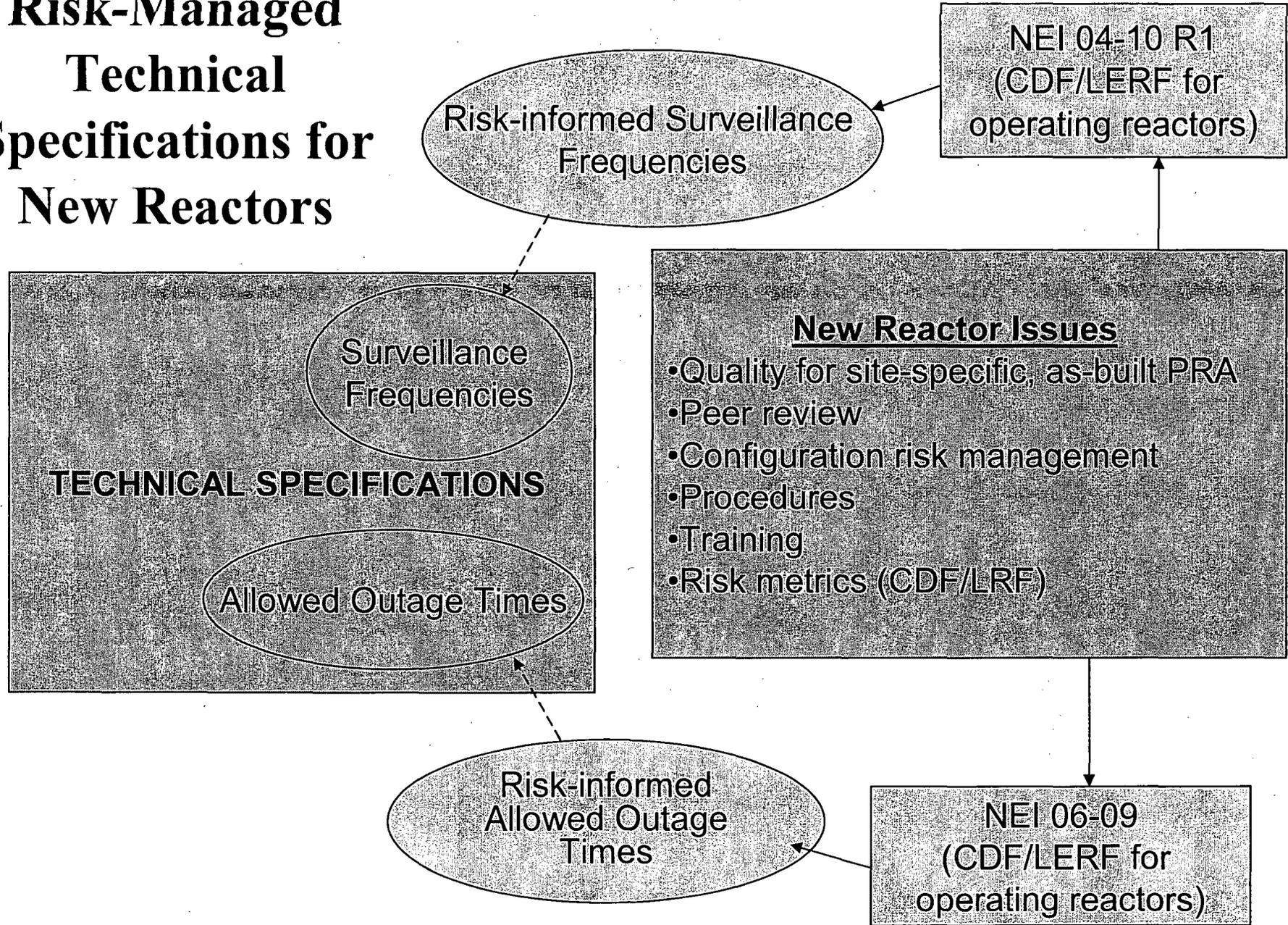
RISK-INFORMED GUIDANCE TO SUPPORT CURRENT OPERATING REACTORS

- Methodology documents for RICT, NEI 06-09, and for SFCP, NEI 04-10, are specified in TS, and require a quality PRA and quantified risk assessments
- NEI 06-09 and NEI 04-10 written for current operating reactors and invoke quantified risk metrics consistent with RG 1.174 and RG 1.177

New Reactor Operating License Requirements

- Methodology documents NEI 06-09 and NEI 04-10 contain PRA quality/capability requirements and procedural requirements
- The specific requirements that are not exactly derived at the time of COL issuance must be fully described in scope and detail by approved methodologies

Risk-Managed Technical Specifications for New Reactors



Risk Metrics for New Reactors

- New light-water reactors reviewed against more restrictive risk metrics
- Operating reactors regulated to less restrictive risk metrics defined in regulatory guides (RGs) (e.g., RG 1.174, 1.175, 1.177, 1.178, 1.201)
- Determination to be made on risk metrics to be used for new light-water operating reactors
- RITS methodologies for implementing RICTs and SFCP for operating reactors are referred to in TS and may need to be revised along with RGs

PRA Quality Verification Process

DC Application

- Self-assessment of PRA
- NRC staff review and comment
- Final list of proposed PRA upgrades/updates

COL Application

- Site-specific information added to PRA
- NRC staff review and comment
- Additional PRA upgrades/updates, as necessary

Post COL Issuance (prior to fuel load)

- PRA upgrades/updates implemented (e.g., as-built information, procedures, etc.)
- Peer review performed Peer review results resolved
- NRC staff PRA quality assessment and audit, if necessary

Critical Path CP COL TS Items to Adopt RITS on RICT and SFCP

Scheduled COL issuance (December 2011):

- Determine New Reactor Risk Metrics, and if necessary:
 - Revise RGs & NEI methodology documents to address risk metrics
- Complete/update TS methodologies (e.g., PRA quality verification process, configuration risk management process) to support RITS on RICT & SFCP
- Complete procedures required by NEI methodology documents (OR detailed method for achieving them)

Next Steps

- Are new reactor risk metrics needed? Revise RGs & NEI documents?
- Prepare methodologies and procedures? Revise or addend NEI documents?
- CP prepare for contingency of removing RICT and SFCP from TS
 - Decision point for no schedule delay?? (September 2010; date at which staff needs to complete Phase 2 SER with open items)
- Hold periodic meetings/telecons on risk-managed TS, as necessary

Comanche Peak Schedule, Conclusion

- If completion of RITS requirements cannot be accomplished to support the proposed schedule, Comanche Peak will need to decide whether to remove RICT and SFCP initiatives from proposed TS (and resubmit after COL is issued, via license amendment request), or accept a delay in schedule
- A cooperative effort to expeditiously revise metrics and associated documents, if necessary, would be required to meet the schedule

Questions and Comments

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