

NEI Response to NRC Questions on IE01 Changes

Tim Kobetz, Reactor Inspection Branch Chief, was not in attendance and provided five questions. Answers were provided during the meeting and the staff requested that written answers be provided during the March meeting. The questions and preliminary answers are:

The staff requests industry response to the following questions regarding proposed change to NEI 99-02 guidance (presented at March 2009 meeting) regarding performance indicator IE01 - Unplanned Scrams:

1. What is the basis or significance for the 35% reactor power level?
2. Are there plants where the normal shutdown procedure allows the insertion of a reactor scram above this power level?
3. Is the power level low enough to normally prevent safety systems from initiating on a low level after the scram is inserted?
4. Are you open to leaving the wording the same but maybe expanding the definition of planned shutdown?
5. Are there going to be complaints if a scram is inserted at 36% power on a normal shutdown and has to be counted as a scram?

Draft answers as discussed during the meeting (paraphrased and not verbatim)

1. The 35% value was derived from an informal survey of licensee practices involving the insertion of the scram signal to complete a planned shutdown. There are different reasons for inserting the scram signal at different levels and 35% was picked as a bounding value.
2. Yes - The Perry FAQs were an input to the changes to the guidance. A comprehensive survey of the industry with 100% response was not performed.
3. It not logical or conceivable that a licensee would insert the scram signal to complete a planned shutdown with the knowledge that a safety system would actuate.
4. Yes - But we cannot go back to the staff's proposal of stating "preferred normal." The original Task Force proposal that stated as long as the scram signal was not in response to an AOP or EOP would be acceptable. The insertion of the scram signal is just a step in a normal shutdown and not the response to a plant transient or other condition, such as high turbine vibrations or a chemistry excursion, that would most likely be addressed by an AOP or EOP.
5. No - The guidance should identify the indication that would be used to determine power level as the one that is used to control the plant and if a licensee were to submit an FAQ the ROP Task Force would screen it out if it clearly should count.