

From: Wang, Alan
Sent: Monday, January 11, 2010 12:30 PM
To: BURMEISTER, BARRY M; David Lorfing (DLorfin@entergy.com)
Cc: Lent, Susan; Burkhardt, Janet; Dinsmore, Stephen
Subject: Request for Additional Information Regarding Relief Request RBS-ISI-013 (ME1507)

Barry and Dave,

By letter dated June 16, 2009, (Agencywide Documents Access & Management System (ADAMS) ML09174306), Entergy Operations, Inc. (Entergy, the licensee), submitted a risk-informed inservice inspection relief request (RR) based on the ASME Code Case N-716 for the River Bend Station (RBS). The relief request included a table identifying 72 Supporting requirements in the ASME standard that had been judged "not met" during the gap analysis. In addition an additional 30 ASME supporting requirements were judged to be capability category I instead of the higher categories of II or III. Regulatory Guide (RG) 1.200, *An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities* states, in part, that "the staff anticipates that current good practice, i.e., Capability Category II of the ASME/ANS standard, is the level of detail that is adequate for the majority of applications in general." On December 8, 2009, the US Nuclear Regulatory Commission (NRC) staff conducted an audit at the RBS to determine whether the technical adequacy of the River Bend PRA was consistent with RG 1.200 and RI-ISI guidelines.

The NRC staff has determined that based on the audit the following additional information is needed to complete its review of the subject RR for RBS. This request was discussed with Barry Burmeister of your staff on January 8, 2010, and it was agreed that a response would be provided by March 12, 2010. If circumstances result in the need to revise the requested response date, please contact me at (301) 415-1445 or via e-mail at Alan.Wang@nrc.gov.

2.0 REQUEST FOR ADDITIONAL INFORMATION

1. Energy has evaluated many of the surveillance requirements (SRs) that were assigned less than a Category II and have concluded that resolving the difference between the assigned category and category II would not substantively affect the RI-ISI results. These SRs were discussed during the audit and the staff concurs that, individually, the proposed modification would not be expected to affect the RI-ISI program. The cumulative impact of all these changes is not expected to affect the RI-ISI program but this conclusion cannot be confirmed until after the PRA has been updated. You have stated that you intend to update your PRA to meet the Category II requirements for these SRs while completing its next PRA update. The next update is scheduled to be concluded in December of 2010. However, you have requested that the RI-ISI program be authorized by December 2010 in order to be properly integrated into your outage schedules. Provide a commitment summarizing your schedule to re-evaluate your RI-ISI program after the PRA update.

2. Changes to the PRA that might be required to meet Category II for a few SRs could, individually, be important (i.e., affect RI-ISI results), and therefore the staff requests the following additional information before the staff completes its review of the proposed RI-ISI program.

2a. AS-A9 (Gap to capability category II). Please review the TH analyses relied upon in scenarios relevant to RI-ISI and summarize how the applicability of these success criteria is demonstrated. plant-specific

2b. SC-A5 (not met): Please review the scenarios relevant to RI-ISI and summarize how an appropriate mission time was developed and used.

2c. SY-A17 (not met): Please review the scenarios relevant to RI-ISI and confirm that potential system interactions that could cause a mitigative function to be tripped off or isolated have been modeled.

2d. HR-B1 (not met), HR-B2 (not met), and HR-G4 (not met). HR-B1 and HR-B2 describes how operator actions can be screened from consideration. HR-G4 describes how time available for human actions is developed. Please review the scenarios relevant to RI-ISI and confirm that the SR requirements have been met for these scenarios.

E-mail Properties

Mail Envelope Properties (C0A338EE37A11447B136119705BF9A3F5A45E68A50)

Subject: Request for Additional Information Regarding Relief Request RBS-ISI-013 (ME1507)

Sent Date: 1/11/2010 12:30:35 PM

Received Date: 1/11/2010 12:30:35 PM

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Files	Size	Date & Time
MESSAGE	13215	1/11/2010

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Expiration Date:

Priority: olImportanceNormal

ReplyRequested: False

Return Notification: False

Sensitivity: olNormal

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