

Harris SE Lessons Learned

- Radioactive Release information lends itself well to a table format (Line item by fire area; engineered controls, comments)
- Discussion of Peer Review Findings and their associated resolution lends itself well to a table format
- Non-Power Operational Mode review does not lend itself well to the table format (Table F-1 from NEI 04-02)
 - Both Pilot LARs essentially used text sections in a table format

Harris Lessons - continued

- A major activity in Chapter 4 is the identification of the required fire protection systems and features
 - Numerous attributes can make a system/feature required
 - Use of a table makes sense to document the systems required and why
 - Progress provided this information in a table in the Transition Report (Table 4-8)

Harris Lessons - continued

- A detailed list of Variations from Deterministic (VFD) requirements is essential for the reviewer to know what is being evaluated
 - Progress provided this detail as open items in the B-3 Table in Attachment C and as individual VFDs in Attachment Y
 - This level of detail facilitates documenting the acceptability of each VFD in the SE

Harris Lessons - continued

- A detailed list of proposed and/or completed modifications is essential for the reviewer to know how open items are being addressed
 - Progress provided this detail as open item resolutions in the B-3 Table in Attachment C and as a discussion of proposed mods in Attachment S
 - This level of detail facilitates documenting the acceptability of each mod in the SE

Harris Lessons - continued

- A detailed list of operator manual actions being transitioned as recovery actions is also essential for the reviewer to know how each is being addressed during transition
 - Progress provided this detail in Attachment G by fire area
 - This level of detail facilitates documenting the acceptability of each recovery action in the SE

Harris Lessons - continued

- Open items identified in the B-3 table should be clear in defining what the problem is, what components and cables are affected, and what the resolution is.
 - Identifying the specific component and the cables allows the reviewer to look up the issue in supporting references/calculations
 - Documentation of the resolution by modification should allow the reviewer to refer to a more detailed explanation of the modification sufficient to understand how it alleviates the open item issue

Harris Lessons - continued

- Somewhere in the LAR, the licensee must document the risk increase associated with items that are being evaluated using the performance-based approach (the so called delta-risk numbers)
 - Progress provided this detail in Attachment Y
 - There should be a clear statement of compliance, including a documented review of risk, DID and SM for each area using a performance-based approach

Harris Lessons - continued

- The additional risk of Recovery Actions should be clearly presented so that the reviewer can verify that the requirements have been met
 - Transition Report should provide a number for the additional risk of recovery actions by fire area and total
 - For Alternative Shutdown areas, this may require the use of a surrogate for the delta risk (may end up using the whole fire area risk).
 - If the fire area risk is used as a surrogate, it must be added to the other deltas from recovery actions

Harris Lessons - continued

- The staff is capturing all items that have not been completed at the time the SE is drafted as **CONFIRMATORY ITEMS**
 - This means that we will track that item as an open item that must be closed by one of three methods:
 - By a letter from the Licensee under Oath or Affirmation that the item is complete
 - By an NRC audit
 - By an NRC inspection
 - Many of the items that are planned to be closed during the implementation window will now be considered Confirmatory Items (procedure changes, training, design change implementation, etc.).

Harris Lessons - continued

- The LAR template should have a section for presenting new/novel approaches to resolution of VFDs
 - Installation of Incipient Detection at Harris required a new section in the Transition Report that addresses the technical and regulatory aspects

Harris Lessons - continued

- In preparing the Harris SE, it became apparent that there were two major types of information being evaluated in the SE
 - Methods in the various engineering analyses
 - Fundamental Program Transition
 - Nuclear Safety Capability Assessment Methods
 - Non-Power Ops
 - Fire Modeling
 - Fire Risk Assessments
 - Results of those analyses
 - Fire Area
 - Deterministic
 - Performance-Based
 - Topical
 - Non-Power Ops

Harris Lessons - continued

- The new SE layout being used for Harris changes the organization of the SE from that in the SRP
 - Review of B-1 and B-2 tables are part of Method
 - Fire PRA is part of Method
 - Part of NPO is method, part is results
 - B-3 is discussed in results

Harris Lessons - Summary

- Use of Tables in LAR makes a lot of sense in many areas; use them when it makes sense, don't if it doesn't
- Detailed lists of items for consideration (VFDs, Mods, OMAs, Open Items, etc.) aid the reviewer and are to be encouraged
- Level of detail is important to both licensee and reviewer
 - SE will be written to the level of detail provided in the LAR (don't submit information on a fire area level if you want your licensing basis to be spelled out on a zone level and/or system level)