



Program Management Office
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April 27, 2010
OG-10-154

TSTF-446 Revision 3
Project Number 694

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RULES AND DIRECTIVES
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Subject: **PWROG Comments on the Revised Draft Model Application for Plant-Specific Adoption of Technical Specification Task Force Traveler-446, Revision 3, "Risk Informed Evaluation of Extensions to Containment Isolation Valve Completion Times (WCAP-15791)."**

Reference: 1. OG-09-404, "PWROG Comments on the September 15, 2009 Federal Register Notice, "Notice of Opportunity for Public Comment on the Proposed Model Safety Evaluation for Plant-Specific Adoption of Technical Specification Task Force Traveler-446, Revision 3, "Risk Informed Evaluation of Extensions to Containment Isolation Valve Completion Times (WCAP-15791)," Docket ID NRC-2009-0403," dated October 15, 2009.

Enclosed for NRC consideration are comments (Enclosure 1) and proposed changes (Enclosure 2) on the revised draft model application for TSTF-446, Revision 3, "Risk Informed Evaluation of Extensions to Containment Isolation Valve Completion Times (WCAP-15791)," that was provided to the PWROG at the March 26, 2010 meeting with the staff to discuss this traveler. Reference 1 transmitted the PWROG comments on the draft model application that was issued for public comment in the Federal Register on September 15, 2009.

If you have any questions, please do not hesitate to contact Mr. James Andrachek at (412) 374-5018, Mr. Jerry Andre at (412) 374-4723, or Mr. Chad Holderbaum of the PWR Owners Group Program Management Office at (412) 374-6230.

Regards,

Chad Holderbaum

Approving for Melvin L. Arey, Jr.

Melvin L. Arey, Jr.
Chairman, PWR Owners Group

E-RIDS = ADM-03

Cell = M. Honcharik (Mch3)

SUNSI Review Complete
Template = ADM-013

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April 27, 2010
OG-10-154

MLA:CMH:rfn

Enclosures 2

cc: PWROG Licensing Subcommittee
S. Rosenberg, USNRC
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R. Grover, USNRC
L. Meledandri, Westinghouse

M.A. Lucci, Westinghouse
G.R. Andre, Westinghouse
J.D. Andrachek, Westinghouse
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Enclosure 1

PWROG Comments on the Revised Model Application for Plant-Specific Adoption of Technical Specification Task Force Traveler-446, Revision 3, "Risk Informed Evaluation of Extensions to Containment Isolation Valve Completion Times (WCAP-15791).

1. General Comment; The model application should be limited to the implementation of the generic analysis and associated CIV Completion Times (CTs) contained in Section 8 of WCAP-15791-P-A, Rev. 2. This should be stated in the cover letter and Attachment 1 to the cover letter, as well as the Proposed Safety Evaluation. Proposed text has been added to the cover letter and Attachment 1 in Sections 2.1, 2.2, and 3.2, and Section 3.1 of the Proposed Safety Evaluation. Implementing the generic CTs obviates the need to perform plant specific Tier 1 evaluations to determine the CIV CTs, and therefore reference to Reg Guide 1.200, Rev. 2 is not required.

2. General Comment; The model application includes the No Significant Hazards Consideration (NSHC) determination and also requires that it be included in the plant-specific license amendment request. This is inconsistent with previous model applications published via the CLIIP, which referenced the published NSHC. Requiring each licensee to resubmit the NSHC provides no benefit to the NRC or licensee. It is also inconsistent with the treatment of the Environmental Considerations included in the model application. It is recommended that the model application be revised to only reference the NSHC published in the Federal Register, and delete it as Attachment 6 in the model application. The word “analysis” was revised to “determination” to reflect the commonly used term for the NSHC.

3. Section 1.0, “Description”; Deleted the phrase “-Risk Informed Technical Specification Task Force (RI-TSTF) Initiative 4a” from the title of TSTF-446. This change reflects the actual title of the traveler.

4. Section 2.1, “Applicability of Published Safety Evaluation” of the model application, and in the Model Safety Evaluation of the model application, the model application requires the plant-specific license amendment request to address or meet the requirements contained in Nuclear Energy Institute (NEI) 99-04, Revision 0, “Guidelines for Managing NRC Commitment Changes.” NEI 99-04 is a voluntary industry guideline which the NRC determined to be acceptable for controlling regulatory commitments made by licensees to the NRC. NEI 99-04 was not referenced in TSTF-446, Rev. 3, discussed in the Model Safety Evaluation, or the SE for WCAP-15791-NP-A, Revision 2. It is inappropriate for the NRC to impose a requirement to follow a voluntary industry guideline when it was not proposed by the WCAP, or referenced in the NRC staff's SE for the CIV CT changes. It is recommended that reference to NEI 99-04 be deleted from the model application.

5. Section 3.2, “Verifications, Commitments, and Additional Information Needed”; It is stated “This LAR provides the plant-specific information on limitations and conditions specified in Section 4.0 and the additional information specified in Section 5.0 of the SE approving TR WCAP-15791-NP-A, Revision 2. In addition, consistent with TSTF-446, [LICENSEE] must provide information for Items 3.2.1 through 3.2.9 as discussed below in this amendment request.” These statements infer that items 3.2.1 through 3.2.9 do not address the items identified in Section 5.0 of the SE for WCAP-15791-NP-A, Revision 2, when they are addressed by items 3.2.1 through 3.2.9. Additionally, Section 4.0 of the

SE for WCAP-15791-NP-A, Revision 2 is addressed by Condition D of TSTF-446, Rev. 3. Therefore, a Reviewer's Note was added to clarify how Sections 4.0 and 5.0 of the SE for WCAP-15791-NP-A, Revision 2 are addressed.

6. Section 3.2.2, "Demonstration (Tier 2 Evaluation)"; There is a requirement to ensure that before maintenance is completed on a CIV that the other CIVs in the penetration flow path have been confirmed to be in their proper position. Section 3.2.2 has been revised to clarify that this requirement is necessary. The reference to a Tier 3 evaluation was deleted, since Tier 3 evaluations are addressed in Section 3.2.3.

7. Section 3.2.2, "Demonstration (Tier 2 Evaluation)"; The text " and any inoperable CIVs...to the specific plant." was deleted. WCAP-15791-P-A, Rev. 2 determined that the CIV Completion Times evaluated were acceptable from a risk standpoint. The Tier 3 evaluations discussed in Section 3.2.3, ensure that any additional inoperable CIVs will not result in a risk significant configuration.

8. Sections 3.2.3, "Demonstration (Tier 3 Evaluation)" and 3.2.4 "Demonstration (Plant Specific PRA Quality)"; The text: "performing a Tier 3 evaluation" was added to clarify that the quality, scope, and technical adequacy of the PRA model must be sufficient for performing Tier 3 evaluations. Implementing the generic CTs obviates the need to perform plant specific Tier 1 evaluations to determine the CIV CTs, and therefore Reg Guide 1.200, Rev. 2 is not applicable for implementing the generic CTs.

9. Section 3.2.3, "Demonstration (Tier 3 Evaluation)"; "has been" was revised to "will be" consistent with the regulatory commitment in Attachment 4, which does not require the PRA model to be capable of performing LERF/ICLERP assessment when submitting the license amendment request. The PRA model must include the modeling of CIVs prior to implementing the extended CIV CT changes.

10. Section 3.2.4, "Demonstration (Plant Specific PRA Quality)"; Third bullet contains the phrase "... including facts and observations (A and B)...". The words "currently referred to as Findings" were added, since the facts and observations no longer use the A, B, C, and D, categorization approach; only Findings (previously A&B) and Observations (others).

11. Section 3.2.4, "Demonstration (Plant Specific PRA Quality)"; In the third bullet, the phrase "input parameters used in the Tier 1 generic analysis" at the end of the first sentence, was replaced with "parameters used to demonstrate the applicability of the generic analysis and associated completion times." This change provides improved clarity as to what is required to implement the generic CT changes.

12. Section 3.2.4, "Demonstration (Plant Specific PRA Quality)"; The last paragraph that starts "As clarified in Regulatory Issue Summary 2007-06, "Regulatory Guide 1.200 Implementation," dated March 22, 2007, the NRC staff will use RG 1.200 to assess the technical adequacy ..." should be deleted, since this model application is limited to implementing the generic CTs, and therefore the plant specific PRA model is not used in the evaluation.

13. Section 3.2.5, “Demonstration (external events risk)”; At the end of the second sentence of the Reviewer’s Note the following words “ ... will not have an adverse impact on the conclusions of the plant-specific analysis with respect to the TR evaluation.” were replaced with “ is consistent with the generic analysis.” A plant specific analysis is not required to be performed, only a confirmation that the generic analysis and associated Completion Times are applicable to the plant.

14. Section 3.2.5, “Demonstration (external events risk)”; For the implementation of the generic analysis and associated CTs, it is only necessary to demonstrate that the parameters related to external events are applicable. The last four paragraphs of this section should be deleted, since this information is not necessary to demonstrate the applicability of the generic analysis and associated CTs.

15. Section 3.2.6, “Demonstration (CIV Availability Monitoring)”; The CIV unavailability does not need to be monitored by the Maintenance Rule, there are other options available to monitor CIV unavailability. Therefore, the phrase in the Reviewer’s Note “under the maintenance rule” should be deleted from the text, and only that CIV unavailability be monitored.

16. Section 3.2.6, “Demonstration (CIV Availability Monitoring)”; The phrase in the Reviewer’s Note “a previously approved risk-informed licensing action is found to no longer meet the acceptance guidelines of RG 1.174 and RG 1.177” should be replaced with “the CIV unavailability is inconsistent with the analysis assumptions.” This provides clarity to the Reviewer’s Note with respect to implementing the generic analysis. The words “CIV unavailability” were added for clarity.

17. Section 3.2.7, “Demonstration (Cumulative Risk Evaluation)”; The text: “used to evaluate the applicability...to the specific plant.” was deleted. Cumulative risk and the confirmation of the applicability of the generic analysis on a plant specific basis are separate issues. WCAP-15791-P-A, Revision 2 determined the risk impact of the extended CTs changes based on a generic analysis. The plant specific PRA model is used to confirm that the assumptions made in the generic analysis are bounding, i.e., applicable to the plant implementing the generic CIV CT changes.

18. Section 3.2.8, “(PRA Uncertainty)”; This section should be deleted. There is no need to address uncertainty associated with plant PRA models since the plant PRA model is not used to implement the generic analysis and associated CTs.

19. General Comment; Revised “WCAP-15791-NP-A, Revision 2” to “WCAP-15791-P-A, Revision 2.” Editorial comment for consistency when referring to the TR.

Enclosure 2

Proposed Changes to the Revised Model Application for Plant-Specific Adoption of
Technical Specification Task Force Traveler-446, Revision 3, “Risk Informed
Evaluation of Extensions to Containment Isolation Valve Completion Times
(WCAP-15791).”

THE FOLLOWING EXAMPLE OF AN APPLICATION WAS PREPARED BY THE NRC STAFF. THE MODEL PROVIDES THE EXPECTED LEVEL OF DETAIL AND CONTENT FOR AN APPLICATION TO REVISE TECHNICAL SPECIFICATIONS REGARDING RISK-INFORMED JUSTIFICATION FOR CONTAINMENT ISOLATION VALVE COMPLETION TIME CHANGES. LICENSEES REMAIN RESPONSIBLE FOR ENSURING THAT THEIR ACTUAL APPLICATION FULFILLS THEIR ADMINISTRATIVE REQUIREMENTS AS WELL AS NRC REGULATIONS.

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U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

SUBJECT: PLANT NAME
DOCKET NO. 50-
APPLICATION FOR TECHNICAL SPECIFICATION CHANGE REGARDING
RISK-INFORMED JUSTIFICATION FOR CONTAINMENT ISOLATION VALVE
COMPLETION TIME CHANGES

Dear Sir or Madam:

In accordance with the provisions of Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.90, "Application for Amendment of License, Construction Permit, or Early Site Permit," [LICENSEE] is submitting a request for an amendment to the technical specifications (TS) for [PLANT NAME, UNIT NOS.].

The proposed amendment would modify [LICENSEE] technical specifications (TS) requirements for completion time changes for containment isolation valves with the implementation of Technical Specification Task Force (TSTF)-446, Revision 3, "Risk Informed Evaluation of Extensions to Containment Isolation Valve Completion Times WCAP-15791." This model application addresses implementation of the generic analysis and associated Completion Times contained in Section 8 of WCAP-15791-P-A, Rev. 2.

Attachment 1 provides a description of the proposed change, the requested confirmation of applicability, and plant-specific verifications. Attachment 2 provides the TS pages marked to show the proposed change. Attachment 3 provides revised (clean) TS pages. Attachment 4 summarizes the regulatory commitments made in this submittal. Attachment 5 provides the proposed changes to the TS Bases. Attachment 6 provides plant-specific information.

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[LICENSEE] requests approval of the proposed license amendment by [DATE], with the amendment being implemented [BY DATE OR WITHIN X DAYS].

In accordance with 10 CFR 50.91, "Notice for Public Comment; State Consultation," a copy of this application, with attachments, is being provided to the designated [STATE] Official. I declare [or certify, verify, state] under penalty of perjury that the foregoing is correct and true.

Executed on [date] [Signature]

If you should have any questions about this submittal, please contact [NAME, TELEPHONE NUMBER].

Sincerely,

[Name, Title]

- Attachments:
1. Description and Assessment
 2. Proposed Technical Specification Changes
 3. Revised Technical Specification Pages
 4. Regulatory Commitments
 5. Proposed Technical Specification Bases Changes
 6. Plant-Specific Information

cc: U.S. Nuclear Regulatory Commission
Regional Office
NRC Resident Inspector

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ATTACHMENT 1

DESCRIPTION AND ASSESSMENT

1.0 DESCRIPTION

The proposed amendment would modify technical specifications (TS) requirements for completion times for containment isolation valves (CIVs) with the adoption of Technical Specification Task Force (TSTF)-446, Revision 3 "Risk Informed Evaluation of Extensions to Containment Isolation Valve Completion Times (WCAP-15791)." The changes are consistent with the U.S. Nuclear Regulatory Commission (NRC) approved TSTF-446, Revision 3 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML080510164). The Federal Register notice published on [DATE] announced the availability of this TS improvement.

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2.0 ASSESSMENT

2.1 Applicability of Published Safety Evaluation

[LICENSEE] has reviewed the model safety evaluation (SE) dated [DATE]. [LICENSEE] has also reviewed the NRC staff SE (ADAMS Accession No. ML080170680) approving TR WCAP-15791-P-A, Revision 2. [LICENSEE] has concluded that the justifications and PRA assumptions presented in the TR and the SE are applicable to [PLANT, UNIT NOS.] and justifies this amendment for the incorporation of the changes based on the generic analysis to the [PLANT] TS.

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2.2 Optional Changes and Variation

[LICENSEE] is not proposing any variations or deviations from the STS changes described in TSTF-446, Revision 3, and the NRC staff model safety evaluation, dated [DATE] for implementation of the completion times based on the generic analysis. [If the licensee proposes variations or deviations, then the licensee will describe and justify these variations/deviations and include a statement, such as, the proposed amendment is consistent with the STS changes described in TSTF-446, Revision 3, but [LICENSEE] proposes variations or deviations from TSTF-446, as identified and justified below.]

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Deleted: applicable to [PLANT NAME, UNIT NOS.] as Attachment [] to this amendment request pursuant to the requirements of Title 10 of the Code of Federal Regulations (10 CFR) Section 50.91(a). Also, pursuant to the requirements of 10 CFR Section 50.91(b), [LICENSEE] has notified the appropriate State officials by providing them with a copy of its application and its reasoned analysis about NSHC.

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Consideration

[LICENSEE] has reviewed the No Significant Hazards Consideration (NSHC) determination, published in the Federal Register [DATE] ([] FR []). [LICENSEE] has concluded that the NSHC analysis presented in the Federal Register notice is applicable to [PLANT NAME, UNIT NOS.]. This conclusion satisfies the requirements of Title 10 of the Code of Federal Regulations (10 CFR) Section 50.91(a). [LICENSEE] has forwarded the NSHC to the appropriate State officials.

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(REVIEWER'S NOTE: A proposed model No Significant Hazards Consideration analysis is provided in an Attachment to the model application as an example for the licensee to consider in preparing the NSHC for Plant-Specific adoption of TSTF-446.)¶

3.2 Verifications, Commitments, and Additional Information Needed

[LICENSEE] has demonstrated the applicability of the generic completion times contained in TSTF-446, Revision 3, to [PLANT NAME, UNIT NOS] by addressing requirements specified in TR WCAP-15791-P-A, Revision 2, in this license amendment request (LAR). This LAR provides the plant-specific information on limitations and conditions specified in Section 4.0 and the additional information specified in Section 5.0 of the SE approving TR WCAP-15791-P-A, Revision 2. In addition, consistent with TSTF-446, [LICENSEE] must provide information for Items 3.2.1 through 3.2.8, as discussed below in this amendment request.

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{REVIEWER'S NOTE: Section 4.0 of the SE approving TR WCAP-15791-P-A, Revision 2 is addressed by implementing TSTF-446, Revision 3, which includes new Condition D. Section 5.0 of the SE approving TR WCAP-15791-P-A, Revision 2 is addressed by items 3.2.1 through 3.2.8 below.}

3.2.1 Demonstration (Penetration and CIV Configuration)

[LICENSEE] has confirmed that (a) the Penetration and CIV configurations for [PLANT NAME, UNIT NOS.] match the configurations in TR WCAP-15791-NP-A, Revision 2, and (b) the input parameter values used in the TR are representative or bounding for [PLANT NAME, UNIT NOS].

{REVIEWER'S NOTE: Not all penetrations have the same impact on core damage frequency (CDF), large early release frequency (LERF), incremental conditional core damage probability (ICCDP or ICDP), or incremental conditional large early release probability (ICLERP or ILERP), therefore, the licensee needs to address the applicability of TR WCAP-15791-P-A, Revision 2, to the specific plant. This Penetration and CIV configuration assessment must include verification that (a) the Penetration and CIV configurations for the specific plant match the configurations in the TR and (b) the input parameter values used in the TR are bounding for the specific plant.}

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3.2.2 Demonstration (Tier 2 Evaluation)

[LICENSEE] has confirmed the conclusion in the TR that no Tier 2 requirements are needed other than a requirement to ensure that before maintenance or corrective maintenance (repair) is performed on a CIV, any other CIVs in the penetration flow path have been checked to ensure that they are in their proper position.

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{REVIEWER'S NOTE: A Tier 2 conclusion of the TR as applicable to the specific plant, or the plant specific Tier 2 requirements must be provided by the licensee.}

3.2.3 Demonstration (Tier 3 Evaluation)

[LICENSEE] has addressed a Tier 3 evaluation for [PLANT NAME, UNIT NOS.] by demonstrating conformance to the requirements of the maintenance rule as the requirements relate to the proposed CIV CTs and the guidance contained in the Nuclear Management and Resources Council (NUMARC) document, NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," Revision 2, Section 11, issued April 1996, as endorsed by RG 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." In Attachment 7, [LICENSEE] has provided documentation on the [LICENSEE'S] maintenance rule program, with respect to CIVs, which includes a LERF/ICLERP

(i.e., ILERP as defined in NUMARC 93-01) assessment as part of the maintenance rule process, and that the PRA quality is adequate for performing a Tier 3 evaluation,

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{REVIEWER'S NOTE: The licensee will describe in Attachment 6, the configuration risk management program (CRMP) or maintenance rule (10 CFR 50.65(a)(4)) program (as appropriate), including how it reflects the current PRA model, any simplifications or deviations in the CRMP model from the current plant PRA model, and methods to update the CRMP to reflect the current plant-specific PRA model associated with implementing the CIV completion time changes.

The licensee will address the Tier 3 aspects of RG 1.177, including a description of the CRMP, and confirm that the licensee's CRMP meets all aspects of Section 2.3.7.2 of RG 1.177, including the referenced four key components, associated with implementing the CIV completion time changes.

Additionally, the licensee will confirm that the plant (units) conforms to the requirements of the maintenance rule, as they relate to the proposed CIV CTs and the guidance contained in NUMARC 93-01, Section 11, as endorsed by RG 1.182, including verification that the maintenance rule program, with respect to CIVs, includes a LERF and ILERP assessment, as part of the maintenance rule process, and that the CRMP is adequate, as part of the basis for evaluating the risk impact of CIV maintenance configurations. The licensee needs to confirm that its CRMP model calculates ICCDP (or ICDP) and ICLERP (or ILERP) and that the licensee's model is capable of modeling CIVs or will be modified to include CIVs}.

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3.2.4 Demonstration (Plant-Specific PRA Quality)

[LICENSEE] has demonstrated in Attachment 6, that the plant-specific PRA quality is acceptable for Tier 3 assessments associated with implementing the CIV completion time changes in this application, in accordance with the guidelines given in RG 1.174 and RG 1.177.

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{REVIEWER'S NOTE: The licensee needs to describe in Attachment 6, the scope of the plant-specific PRA and justify its technical adequacy for performing a Tier 3 evaluation, in accordance with the guidance provided in RG 1.174 and RG 1.177. Specifically, the supporting documentation needs to address each area in sufficient detail to satisfy the following:

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- Assurance that the plant-specific PRA reasonably reflects the as-built, as-operated plant.
- Assurance that plant-specific PRA updates, including any plant improvements or commitments cited and credited in the analysis, have been implemented from the individual plant evaluation (IPE) and the IPE for external events (IPEEE) and subsequent peer reviews and self-assessments. Reference to past submittals discussing this information is acceptable.
- Assurance that conclusions from the peer review, including facts and observations (A and B, currently referred to as Findings), that are

applicable to proposed extended CTs for CIVs were considered and resolved, associated with the parameters used to demonstrate the applicability of the generic analysis and associated completion times. If not resolved, the licensee must provide the justification for the acceptability of the conclusions (e.g., sensitivity studies showing negligible impact). The licensee should indicate the PRA revisions that underwent the peer review and were used in the plant-specific application.

- Assurance that there is PRA configuration control and updating, including PRA quality assurance programs, associated procedures, and PRA revision schedules.
- Assurance that there is PRA adequacy, completeness, and applicability with respect to evaluating the risk associated with the proposed CIV CT extensions, i.e., that the model is capable of supporting a CRMP assessment when a CIV is inoperable.
- Assurance that plant design or operational modifications that are related to or could affect the proposed CT extensions are reflected in the PRA revision used in the plant-specific application or that a justification is provided for not including these modifications in the PRA.

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3.2.5 Demonstration (external events risk)

[LICENSEE] has demonstrated in Attachment 7 that external events risk is bounded by TR WCAP-15791-P-A, Revision 2, assumptions and will not have an adverse impact on the conclusions of the [PLANT NAME, UNIT NOS.] analysis for extending the CIV CTs.

{REVIEWER'S NOTE: External events may include seismic, tornados or high winds, internal or external fires, floods, or other related events applicable to each licensee. The licensee needs to demonstrate, by either quantitative or qualitative means, that external event risk is consistent with the generic analysis. For some participating plants, internal fires and other external event risks may contribute significantly to the overall plant baseline risk, which may affect TR WCAP-15791, so that a plant-specific application of the TR methodology may not be found acceptable in all cases. Specifically, the risk from external events should not make the total baseline LERF exceed 1E-4/yr CDF or 1E-5/yr LERF without justification.

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Deleted: If the licensee has performed an updated analysis of an external event since the NRC staff review of the licensee's IPEEE, and a quantitative PRA demonstration is [3]

3.2.6 Demonstration (CIV Availability Monitoring)

[LICENSEE] has demonstrated in Attachment 7 for [PLANT NAME, UNIT NOS.] how plant-specific CIV availability is monitored and assessed at the plant, and that performance continues to be consistent with the CIV availability analysis assumptions used to justify extended CIV CTs, including the assumptions in TR WCAP-15791.

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Deleted: For external events not included in the plant PRA but that rely on a non-PRA method (e.g., seismic margins analysis or fire-induced vulnerability evaluation) to confirm [5]

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{REVIEWER'S NOTE: The licensee needs to address how CIV availability is monitored and assessed, which includes confirmation that performance continues to be consistent with the CIV availability analysis assumptions used to justify extended CIV CTs and needs to describe what actions are to be taken if the CIV availability is not consistent with the generic analysis assumptions.}

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3.2.7 Demonstration (Cumulative Risk Evaluation)

[LICENSEE] has demonstrated in Attachment 7 that the cumulative risk has been evaluated for [PLANT NAME, UNIT NOS.] in accordance with guidance in RG 1.174, with respect to past [PLANT NAME, UNIT NOS.] license amendments or additional [PLANT NAME, UNIT NOS.] applications for a TS change under the NRC review that have not been incorporated into the baseline PRA.

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{REVIEWER'S NOTE: The cumulative risk impact of the proposed CT extensions for CIVs must be addressed in the plant-specific application, in accordance with the acceptance guidelines in RG 1.174. The cumulative risk impact must include both previous plant license changes and additional plant applications still under review.}

3.2.8 Demonstration (Regulatory commitment)

[LICENSEE] has incorporated a regulatory commitment addressing how LERF/ILERP is assessed and has provided documentation in the [PLANT NAME, UNIT NOS.] submittal.

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Deleted: <#>Demonstration (PRA Uncertainty)¶
¶
[LICENSEE] has demonstrated in Attachment 7 that uncertainty caused by plant PRA models as it relates to this application, is addressed according to RG 1.174 guidance.¶
¶
{REVIEWER'S NOTE: Licensee needs to address that uncertainty associated with plant PRA models does not significantly impact the risk assessment results and decisions regarding acceptability.}¶

{REVIEWER'S NOTE: Licensee needs to address the plant CRMP, including the maintenance rule program implemented under 10 CFR 50.65(a)(4) as appropriate, and explain how the LERF/ILERP is assessed in the program.}

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4.0 ENVIRONMENTAL EVALUATION

[LICENSEE] has reviewed the environmental evaluation included in the proposed safety evaluation dated [DATE]. [LICENSEE] has concluded that the proposed determination presented in the notice is applicable to [PLANT NAME, UNIT NOS.] and the determination is provided as an attachment to this LAR to satisfy the requirements of 10 CFR 50.91(a).

ATTACHMENT 2: PROPOSED TECHNICAL SPECIFICATION CHANGES (MARK-UP)

ATTACHMENT 3: PROPOSED TECHNICAL SPECIFICATION PAGES

ATTACHMENT 4: LIST OF REGULATORY COMMITMENTS

The following table identifies those actions committed to by [LICENSEE] in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments. Please direct questions regarding these commitments to [CONTACT NAME].

REGULATORY COMMITMENTS	DUE DATE
[LICENSEE] commits to implementing the capability to assess the effect on incremental large early release probability when using the extended completion times for containment isolation valves in the program for managing risk in accordance with 10 CFR 50.65(a)(4) and the plant-specific configuration risk management program.	[Complete, implemented with amendment, OR within X days of implementation of amendment]

ATTACHMENT 5: PROPOSED CHANGES TO TECHNICAL SPECIFICATION BASES

ATTACHMENT 6: PLANT-SPECIFIC INFORMATION

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ATTACHMENT 7: .

PROPOSED MODEL NO SIGNIFICANT HAZARDS CONSIDERATION

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Description of Amendment Request: The change requests the adoption of an approved change to the standard technical specifications (STS) for Westinghouse plants (NUREG-1431), to allow modification of containment isolation valve (CIV) completion times associated with the adoption of Technical Specification Task Force (TSTF)-446, Revision 3, "Risk Informed Evaluation of Containment Isolation Valve Completion Times (Topical Report WCAP-15791-P, Revision 2)," dated February 19, 2008 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML080510164). The Notice of Availability published in the Federal Register on [Date] [xx FR xxxxx] described the proposed change.

The proposed change extends the completion times for containment penetration flow paths with one CIV inoperable from 4 hours up to 168 hours (7 days) for Westinghouse plants. This change is applicable to containment penetrations with one or more CIVs, in which one CIV is inoperable [for reasons other than shield building bypass or purge valve leakage not within limit] and where the CIV is either intact or not intact. In addition, this change addresses conditions where there are two or more penetration flow paths with one CIV inoperable (for reasons other than that the shield building bypass or purge valve leakage are not within limits).

Basis for proposed no significant hazards consideration: As required by Title 10 of the Code of Federal Regulations (10 CFR) Section 50.91(a), [LICENSEE] analysis of the issue of no significant hazards consideration is presented below:

1. Does the Proposed Change Involve a Significant Increase in the Probability or Consequences of an Accident Previously Evaluated?

Response: No

The proposed changes to the completion times do not change the response of the plant to any accidents, have no impact on the reliability of the CIV, and have an insignificant impact on the availability of the CIVs. The proposed changes will not result in a significant increase in the risk of plant operation. This is demonstrated by showing that the impact on plant safety, as measured by core damage frequency (CDF) and large early release frequency (LERF), is not significantly increased, and is acceptable. In addition, for the completion time change, the incremental conditional core damage probabilities (ICCDP or ICDP) and incremental conditional large early release probabilities (ICLERP or ILERP) are also acceptable. These changes are consistent with the acceptance guidelines in Regulatory Guide (RG) 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis," and RG 1.177, "An Approach for Plant-Specific, Risk-Informed Decision-making: Technical Specifications."

The proposed changes do not adversely affect accident initiators or precursors nor do they alter the design assumptions, conditions, or configuration of the facility or the manner in which the plant is operated and maintained. The proposed changes do not alter or prevent the structures, systems, and components from performing their intended function to mitigate the consequences of an initiating event within the assumed acceptance limits. The proposed changes do not affect the source

term, containment isolation, or radiological release assumptions used in evaluating the radiological consequences of an accident previously evaluated. Furthermore, the proposed changes do not increase the types or amounts of radioactive effluent that may be released offsite, nor do they significantly increase individual or cumulative occupational or public radiation exposures.

The proposed changes do not invalidate the safety analysis assumptions and resultant consequences.

Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the Proposed Change Create the Possibility of a New or Different Kind of Accident from any Accident Previously Evaluated?

Response: No

The proposed changes do not result in a change in the manner in which the CIVs provide plant protection. No design changes are associated with the proposed changes. The changes to completion times do not change any existing accident scenarios nor do they create any new or different accident scenarios. The changes do not involve a physical alteration of the plant (i.e., no new or different type of equipment will be installed) or a change in the methods governing normal plant operation. In addition, the changes do not impose any new or different requirements or eliminate any existing requirements. The proposed changes do not alter assumptions made in the safety analysis and do not invalidate the safety analysis assumptions and current plant operating practice.

3. Does the Proposed Change Involve a Significant Reduction in a Margin of Safety?

Response: No

The proposed changes do not alter the manner in which safety limits, limiting safety system settings, or limiting conditions for operation are determined. The safety analysis acceptance criteria are not affected by these changes. The proposed changes will not result in plant operation in a configuration outside the design basis. The calculated impact on risk is consistent with the acceptance guidelines contained in RG 1.174 and RG 1.177.

Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

Based upon the reasoning presented above, the [LICENSEE] concludes that the requested change does not involve a significant hazards consideration, as set forth in 10 CFR 50.92(c), "Issuance of Amendment."

PROPOSED SAFETY EVALUATION

U.S. NUCLEAR REGULATORY COMMISSION

OFFICE OF NUCLEAR REACTOR REGULATION

TECHNICAL SPECIFICATION TASK FORCE (TSTF) CHANGE TSTF-446

MODIFICATION TO CONTAINMENT ISOLATION VALVE COMPLETION TIMES

1.0 INTRODUCTION

By letter dated [-----, 20--], [LICENSEE] (the licensee) proposed changes to the technical specifications (TS) for [PLANT NAME]. The requested change is the adoption of NRC-approved Technical Specification Task Force (TSTF)-446, Revision 3, "Risk Informed Evaluation of Containment Isolation Valve Completion Times (Topical Report WCAP-15791-P-A, Revision 2)," dated February 19, 2008 (Agencywide Documents Access Management System (ADAMS) Accession No. ML080510164). TSTF-446 proposes a generic change to NUREG-1431, Revision 3, "Standard Technical Specifications Westinghouse Plants," issued June 2004, to implement containment isolation valve (CIV) completion time changes justified in Topical Report (TR) WCAP-15791, Revision 2, "Risk-Informed Evaluation of Extensions to Containment Isolation Valve Completion Times," dated June, 2008. When implemented, the proposed change would extend the CIV completion times for TS Limiting Condition for Operation (LCO) 3.6.3, "Containment Isolation Valves (Atmospheric, Subatmospheric, Ice Condenser, and Dual)," from 4 hours up to 168 hours (7 days). (For containment isolation valves where acceptable results could not be demonstrated for 168 hours, shorter times are considered and evaluated).

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2.0 REGULATORY EVALUATION

In Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.36, "Technical Specifications," the NRC established its regulatory requirements related to the content of TS. Pursuant to 10 CFR 50.36, TS are required to include items in the following five specific categories related to station operation: (1) safety limits, limiting safety system settings, and limiting control settings, (2) LCOs, (3) surveillance requirements, (4) design features, and (5) administrative controls. However, the regulation does not specify the particular TS to be included in a plant's license. TSTF-446 is proposing changes to the TS LCO that concern the Category 2 requirements. The LCOs are the lowest functional capability, or performance levels, of equipment required for safe operation of the facility. When an LCO of a nuclear reactor is not met, the licensee shall follow any remedial actions permitted by the TS until the condition can be met or shall shut down the reactor.

Furthermore, the completion times specified in the TS must be based on the reasonable protection of public health and safety. As set forth in 10 CFR 50.36, a licensee's TS must establish the LCOs that are the lowest functional capability, or performance levels, of equipment required for safe operation of the facility. This requirement includes completion times for structures, systems, and components (SSCs), such as CIVs. These completion times allow a certain amount of time in which to correct a condition that does not meet the LCO before the

reactor must be brought to a condition that exits the mode of applicability, in most cases resulting in the reactor being shut down.

The Maintenance Rule, 10 CFR 50.65, "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," requires licensees to monitor the performance, or condition, of SSCs against licensee-established goals in a manner sufficient to provide reasonable assurance that SSCs are capable of fulfilling their intended functions. The implementation and monitoring program guidance in Section 2.3 of Regulatory Guide (RG) 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis," states that monitoring performed in conformance with the Maintenance Rule can be used when such monitoring is sufficient for the SSCs affected by the risk-informed application recognizing the additional guidance for a configuration risk management program (CRMP) identified in RG 1.177. In addition, 10 CFR 50.65(a)(4), as it relates to the proposed extension of CIV completion times, requires the assessment and management of the increase in risk that may result from the proposed maintenance activity.

The CIVs help ensure that adequate primary containment boundaries are maintained during and after accidents by minimizing potential pathways to the environment and help ensure that the primary containment function assumed in the safety analysis is maintained. The following general design criteria (GDC) apply to this change and establish the necessary design, fabrication, construction, testing, and performance requirements for SSCs important to safety, which provide reasonable assurance that the facility can be operated without undue risk to the health and safety of the public. [Pre-GDC (PGDC) facilities not licensed under the GDC in Appendix A, "General Design Criteria for Nuclear Power Plants," to 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities," are licensed under similar plant-specific design criteria, as described in the facility's licensing-basis documents (such as updated final safety analysis reports).]

- GDC 54 (or PGDC), "Piping Systems Penetrating Containment," requires the following:

Those piping systems that penetrate primary containment be provided with leak detection, isolation, and containment capabilities having redundancy, reliability, and performance capabilities that reflect the importance to safety of isolating these piping systems. Such piping systems shall be designed with a capability to test periodically the operability of the isolation valves and associated apparatus and to determine if valve leakage is within acceptable limits.

- GDC 55 (or PGDC), "Reactor Coolant Pressure Boundary Penetrating Containment," requires the following:

Each line that is part of the reactor coolant pressure boundary and that penetrates primary reactor containment shall be provided with CIVs as follows, unless it can be demonstrated that the containment isolation provisions for a specific class of lines, such as instrument lines, are acceptable on some other defined basis:

- (1) One locked closed isolation valve inside and one locked closed isolation valve outside containment; or

- (2) One automatic isolation valve inside and one locked closed isolation valve outside containment; or
- (3) One locked closed isolation valve inside and one automatic isolation valve outside containment. A simple check valve may not be used as the automatic isolation valve outside containment; or
- (4) One automatic isolation valve inside and one automatic isolation valve outside containment. A simple check valve may not be used as the automatic isolation valve outside containment.

Isolation valves outside containment shall be located as close to containment as practical and upon loss of actuating power, automatic isolation valves shall be designed to take the position that provides greater safety.

Other appropriate requirements to minimize the probability or consequences of an accidental rupture of these lines or of lines connected to them shall be provided as necessary to assure adequate safety. Determination of the appropriateness of these requirements, such as higher quality in design, fabrication and testing, additional provisions for in-service inspection, protection against more severe natural phenomena, and additional isolation valves and containment, shall include consideration of the population density, use characteristics, and physical characteristics of the site environs.

- GDC 56 (or PGDC), "Primary Containment Isolation," requires the following: Each line that connects directly to the containment atmosphere and penetrates primary reactor containment shall be provided with CIVs as follows, unless it can be demonstrated that the containment isolation provisions for a specific class of lines, such as instrument lines, are acceptable on some other defined basis:
 - (1) One locked closed isolation valve inside and one locked closed isolation valve outside containment; or
 - (2) One automatic isolation valve inside and one locked closed isolation valve outside containment; or
 - (3) One locked closed isolation valve inside and one automatic isolation valve outside containment. A simple check valve may not be used as the automatic isolation valve outside containment; or
 - (4) One automatic isolation valve inside and one automatic isolation valve outside containment. A simple check valve may not be used as the automatic isolation valve outside containment.

Isolation valves outside containment shall be located as close to containment as practical and upon loss of actuating power, automatic isolation valves shall be designed to take the position that provides greater safety.

- GDC 57 (or PGDC), "Closed System Isolation Valves," requires the following:

Each line that penetrates the primary reactor containment and is neither part of the reactor coolant pressure boundary nor connected directly to the containment atmosphere shall have at least one CIV which shall be either automatic, or locked closed, or capable of remote manual operation. This valve shall be outside containment and located as close to the containment as practical. A simple check valve may not be used as the automatic isolation valve.

3.0 TECHNICAL EVALUATION

3.1 Probabilistic Risk Assessment (PRA) for the Proposed Changes

[LICENSEE] adoption of TSTF-446, Revision 3, would allow extending CIV completion times specified in TS [LCO 3.6.3, "Containment Isolation Valves (Atmospheric, Subatmospheric, Ice Condenser, and Dual)"]. TR WCAP-15791-P-A, Revision 2, referenced in TSTF-446, Revision 3, describes a method to revise the completion time for specific conditions in TS LCO 3.6.3. The NRC staff reviewed, the risk impact, using the three-tiered approach referenced in RG 1.174 and RG 1.177 associated with the proposed TS changes. The first tier evaluates the probabilistic risk assessment and the impact of the proposed extension of completion times for CIVs on plant operational risk. The second tier addresses the need to preclude potentially high-risk plant equipment outage configurations by identifying the need for additional controls or compensatory actions to be implemented during the time a CIV is unavailable because of maintenance. The third tier evaluates the licensee's overall configuration risk management program and confirms that risk insights are incorporated into the decision-making process before equipment is taken out of service before or during CIV maintenance.

The NRC staff determined that the risk analysis methodology and approach used by TR WCAP-15791-P-A, Revision 2, to estimate the risk impact was reasonable. The NRC staff stated that the risk impact of the proposed extended completion times for CIVs, as estimated by the change in CDF, the change in LERF, the ICCDP (or ICDP) and ICLERP (or ILERP), is consistent with the acceptance guidelines specified in RG 1.174 and RG 1.177 and the associated NRC guidance outlined in Sections 16.1, 19.1, and 19.2 of NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants." CIV configurations, completion times, or nonbounding risk analysis parameters not evaluated by TR WCAP-15791-P-A, Revision 2, require additional justification of the specific penetrations for the proposed CIV completion times.

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The NRC staff also noted that Tier 2, as presented in TR WCAP-15791-P-A, Revision 2, did not identify generic Tier 2 risk-significant configurations as a result of the proposed CIV completion times. In its review of TR WCAP-15791, the NRC staff identified TS and analysis bases that allow only one CIV to be in maintenance with an extended completion time at any given time. In addition, before maintenance or corrective maintenance is performed, other CIVs in the penetration flow path shall be checked for proper position and the licensee will ensure that any inoperable CIVs will not result in a risk-significant configuration. The NRC staff safety evaluation (SE), (ADAMS Accession No ML080170680) also noted that, for licensees adopting TR WCAP-15791, a plant-specific Tier 2 evaluation should be performed to confirm the conclusions of the subject WCAP concerning that this conclusion of no Tier 2 requirements is applicable to the licensee's plant.

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TR WCAP-15791-P-A, Revision 2, did not address Tier 3, and therefore the NRC SE concluded that licensees adopting the subject TR would need to include an evaluation with respect to Tier 3 in their plant-specific application in accordance with the principles in RG 1.177.

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The NRC-approved TR WCAP-15791-P-A, Revision 2, for referencing in license applications to the extent specified and under the limitations and conditions stated in the TR and Section 4.0 of the NRC SE. In addition, per the SE, applications referencing TR WCAP-15791 must address items specified in Section 3.4, "Regulatory Commitments," and Section 5.0, "Additional Information Needed" of the SE.

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The licensee's plant-specific application requesting adoption of TSTF-446 evaluated the conditions, limitations, and additional information needed that are referenced in the Sections 3.4, 4.0, and 5.0 of the NRC SE of TR WCAP-15791-P-A, Revision 2 consistent with implementation of the generic completion time changes. In its application dated [DATE], the licensee provided supporting information for each of the conditions, limitations, and additional information needed that are referenced in the NRC SE. The licensee's supporting information for each condition and limitation, as well as for the additional information needed, met the NRC staff expectations and acceptance criteria [with the following exceptions: list any exceptions to the conditions and limitations or additional information required, as stated in the licensee's submittal, and include the NRC staff evaluation and conclusions].

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Technical Assessment for the Proposed Changes:

[LICENSEE] adoption of TSTF-446, Revision 3 would make changes to the TS [LCO 3.6.3, "Containment Isolation Valves (Atmospheric, Subatmospheric, Ice Condenser, and Dual),"] as follows:

- TSTF-446 revises [LCO 3.6.3], which states "Each containment isolation valve shall be OPERABLE," to read "Each containment isolation valve (CIV) shall be OPERABLE." Adding the abbreviation "(CIV)" to the LCO statement is editorial in nature and does not change the LCO requirement; therefore, this change is acceptable.
- TSTF-446 deletes the Condition A NOTE, which states "Only applicable to penetration flow paths with two [or more] containment isolation valves." The existing Condition C, which is applicable to penetration flow paths with only one CIV and a closed system, is being deleted and replaced by a new Condition B. The new Condition B, along with the revised Condition A, accounts for all of the CIVs covered under existing Condition C; therefore, the Condition A NOTE is no longer required. Revised Condition A and new Condition B apply to all penetration flow paths with at least one CIV. This is consistent with the NRC SE of TR WCAP-15791 and is therefore acceptable.
- TSTF-446 revises Condition A's applicability from "[for reasons other than Condition[s] D [and E]]" to "[for reasons other than Condition[s] E [and F]]." This change is required by the addition of new Conditions B and D, which results in renumbering the conditions that follow Condition D. This change is editorial and does not result in a technical change; therefore, it is acceptable.

- TSTF-446 adds a new requirement to Condition A, which states “Containment isolation valve pressure boundary intact.” This is required to meet the entry condition for Condition A. This requirement is necessary, along with the addition of new Condition B, which is applicable when the CIV pressure boundary is not intact, because existing Condition C is being deleted. Existing Condition C is applicable to penetration flow paths with only one CIV and a closed system. In addition, revised Condition A and new Condition B are applicable to all conditions in which a CIV may be inoperable. Revised Condition A, along with new Condition B, encompasses existing Condition C and is consistent with the NRC SE for WCAP-15791; therefore, it is acceptable.
- TSTF-446 revises the existing 4-hour completion time for Condition A to completion times that range from 4 hours up to 7 days, depending upon the category of the applicable CIV (Category 1 through 7). This change has been evaluated and documented in the SE of TR WCAP-15791. This change proposed by TSTF-446 is consistent with the NRC SE of TR WCAP-15791 and is therefore acceptable.
- TSTF-446 adds a new Condition B, which states “One or more penetration flow paths with one containment isolation valve inoperable [for reasons other than Condition[s] E [and F]] AND containment isolation valve pressure boundary not intact.” This new condition, in conjunction with revised Condition A, addresses all situations where one CIV is inoperable in one or more penetration flow paths. The new Condition B required actions and completion times are the same as those in the revised Condition A, with the exception of the Condition B category of valves. Condition A completion times apply to Category 1 through 7 valves and Condition B completion times apply to Category 8 through 14 valves. The addition of new Condition B has been evaluated and documented in the NRC SE of TR WCAP-15791. This change proposed by TSTF-446 is consistent with the NRC SE of TR WCAP-15791 and is therefore acceptable.
- TSTF-446 renames existing Condition B and Required Action B.1 as Condition C and Required Action C.1. In addition, existing Condition B wording, which states “[for reasons other than Condition[s] D [and E]]” is changed to “[for reasons other than Condition[s] E [and F]].” These changes are editorial in nature, are caused by adding conditions proposed by TSTF-446 that have been evaluated and documented in the NRC SE of TR WCAP-15791, and are therefore acceptable.
- TSTF-446 deletes the existing Condition C and Required Actions C.1 and C.2, which are applicable to penetration flow paths with only one CIV and a closed system. The existing Condition C entry condition is “One or more penetration flow paths with one containment isolation valve inoperable.” With revised Condition A and the addition of Condition B, this covers all CIVs that would have been applicable to existing Condition C. The Required Actions for revised Condition A and new Condition B are identical to the existing Condition C. The completion times for revised Condition A and new Condition B are changed from the existing Condition C time of 72 hours and have been evaluated and documented in the NRC SE of TR WCAP-15791. The deletion of existing Condition C is consistent

with WCAP-15791, is accounted for by the revision to Condition A, and the addition of new Condition B, and is therefore acceptable.

- TSTF-446 adds a new Condition D, which states “Two or more penetration flow paths with one containment isolation valve inoperable [for reasons other than Condition[s] E [and F]].” This condition requires isolating all but one of the affected penetrations within 4 hours (the existing completion time for Condition A). Once this completion time is satisfied, and since revised Condition A and new Condition B will still be applicable, this essentially limits the completion times in Condition A and B to a single penetration. This added requirement enforces the basis of WCAP-15791 that only one CIV should be in maintenance at a time. This change addresses Section 4.0, “Limitations and Conditions,” items 1 and 2, in the NRC SE of TR WCAP-15791 and is therefore acceptable.
- TSTF-446 renames Conditions D, E, and F, along with Required Actions D.1, E.1, E.2, E.3, F.1, and F.2, as Conditions E, F, and G, along with Required Actions E.1, F.1, F.2, F.3, G.1, and G.2. With the addition of new Conditions B and D, and the deletion of current Condition C, the remaining Conditions and Required Actions need to be renumbered. This change is editorial, results in no technical change, and is therefore acceptable.

3.0 SUMMARY AND CONCLUSIONS

The NRC staff has reviewed the [LICENSEE] proposed adoption of TSTF-446, Revision 3, to modify the TS requirements for completion time for CIVs associated with the implementation of TR WCAP-15791-P-A, Revision 2. The NRC staff has reviewed these changes for consistency with the current NUREG-1431 and found them to be consistent.

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The NRC staff has concluded, on the basis of the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the [] State official was notified of the proposed issuance of the amendment. The State official had [(1) no comments or (2) the following comments—with subsequent disposition by the NRC staff].

5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20, “Standards for Protection Against Radiation.” The NRC staff has determined that the amendment involves no significant increase in the amounts and no significant change in the types of any effluents that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards considerations, and there has been no public

comment on the finding [FR]. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

6.0 REFERENCES

1. "Forwarding of TSTFs," dated October 21, 2002 (ADAMS Package Accession No. ML022960409).
2. "TSTF-446, Revision 1, 'Risk-Informed Evaluation of Extensions to Containment Isolation Valve Completion Times (WCAP-15791),' " dated January 31, 2005 (ADAMS Accession No. ML050460293).
3. WCAP-15791-P-A, Revision 2, "Risk-Informed Evaluation of Extensions to Containment Isolation Valve Completion Times," (ADAMS Package Accession No. ML082120239).
4. "TSTF-446, Revision 2, 'Risk-Informed Evaluation of Extensions to Containment Isolation Valve Completion Times (WCAP-15791),' " dated January 11, 2007 (ADAMS Accession No. ML070110620).
5. "TSTF-446, Revision 3, 'Risk-Informed Evaluation of Extensions to Containment Isolation Valve Completion Times (WCAP-15791),' " dated February 19, 2008 (ADAMS Accession No. ML080510164).
6. NUREG-1431, "Standard Technical Specifications Westinghouse Plants," Revision 3, June 2004 (ADAMS Accession No. ML041830612).

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7. Final Safety Evaluation (SE) of Westinghouse Owners Group (WOG) Topical Report (TR) WCAP-15791-P, Revision 2, "Risk-Informed Evaluation of Extensions to Containment Isolation Valve Completion Times," dated February 13, 2008 (ADAMS Accession No. ML080170680).

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7. Nuclear Energy Institute 99-04, Revision 0, "Guidelines for Managing NRC Commitment Changes," July 1999 (ADAMS Accession No. ML003680088).¶

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EVALUATION OF PUBLIC COMMENTS ON THE MODEL SAFETY EVALUATION

The NRC staff evaluated the public comments received on the model SE, model NSHC, and model LAR published in the *Federal Register* on September 15, 2009, (74 FR 47289-47298). The comments were received from the pressurized water reactor owners group (PWROG) (ADAMS Accession No. ML093080192). Enclosures 1 and 2 in the PWROG's letter provide a summary of comments and the proposed changes, respectively. The comments and the NRC staff disposition of each comment are as follows:

Comment 1:

The model application provides options to submit plant-specific analyses in the plant-specific submittal that deviate from the generic analyses and resulting Completion Times that were justified in WCAP-15971-NP-A, Rev. 2, which are reflected in TSTF-446, Rev. 3. These options allow a licensee to reference the model application, while deviating from the changes proposed in TSTF-446, Rev. 3. It is requested that these options in the model application be deleted, since they unnecessarily complicate the model application, and deviate from the generic analyses and resulting Completion Times which are reflected in TSTF-446, Rev. 3.

The Notice contains sufficient guidance should a licensee desire to deviate from the changes proposed in TSTF-446, Rev. 3. The Notice states, "The proposed change does not prevent licensees from requesting an alternate approach or proposing changes other than those proposed in TSTF-446, Revision 3. However, significant deviations from the approach recommended in this notice or the inclusion of additional changes to the license require additional NRC's review. This may increase the time and resources needed for the review or result in NRC staff's rejection of the LAR. Licensees desiring significant deviations or additional changes should instead submit an LAR that does not claim to adopt TSTF-446, Revision 3."

The options contained in the model application to submit plant-specific analyses deviate from the changes proposed in TSTF-446, Rev. 3.

Implementing Condition D, and the Completion Times for the specific penetration and CIV types that are reflected in TSTF-446, Rev. 3 that were justified by the generic Tier 1 analyses contained in WCAP-15971-NP-A, Rev. 2, eliminates the need to perform plant specific Tier 1 and Tier 2 evaluations, and therefore eliminating the need address Regulatory Guide 1.200, Rev. 2, except for Tier 3 evaluations, as discussed in Comment 7 below.

The proposed changes that delete these options to perform plant-specific analyses that are not consistent with the generic Tier 1 analyses contained in WCAP-15971-NP-A, Rev. 2 are identified in Enclosure 2.

Disposition:

- (a) The NRC staff accepted the comment that the options are not specifically addressed in TSTF-446, Rev. 3, and concurred that the Notice of

Availability (NoA) contains sufficient guidance should a licensee desire to deviate from the changes proposed in TSTF-446, Rev. 3. Section 2.2 of the NoA specifically states, "if the licensee proposes variations or deviations, then the licensee needs to describe and justify these variations/deviations and include a statement, such as, the proposed amendment is consistent with the STS changes described in TSTF-446, Revision 3, but [LICENSEE] proposes variations or deviations from TSTF-446, as identified and justified below." The NRC staff revised Section 3.0 to reflect changes as suggested by the PWROG.

- (b) A statement in the 'Applicability' section currently states, "Applicants proposing to use PRA models for which NRC endorsed standards do not exist must submit documentation that identifies the characteristics of those models consistent with Sections 1.2 and 1.3 of RG 1.200 or identify and justify the methods to be applied for assessing the risk contribution for those sources of risk not addressed by PRA models," The commentator suggested replacing this with the statement, "Adoption of this CLIP should be limited to implementing the generic Tier 1 analyses and associated Completion Times that are justified in WCAP-15971-P-A, Rev. 2." The NRC staff concurred with the suggested change with the following modification "Adoption of this TSTF should be limited to implementing the generic Tier 1 analyses including PRA assumptions and associated Completion Times, that are justified in WCAP-15971-P-A, Rev. 2." The NRC staff also revised Section 2.1 by adding the term "including PRA assumptions," which now states, "[LICENSEE] has concluded that the justifications and PRA assumptions presented in the TR and the SE are applicable to [PLANT, UNIT NOS.] and justifies this amendment for the incorporation of the changes to the [PLANT] TS.
- (c) Items 3.2.1 thru 3.2.12 in section 3.2, "Verifications, Commitments, and Additional Information Needed," were restructured as items 3.2.1 thru 3.2.9 consistent with the adoption of TSTF-446. However, the requirements for a licensee's submittal remain unaffected by these changes.
- (d) The commentator suggested to delete the NRC staff "Discussion" on external events risk as stated in item 3.2.5. The NRC staff reviewed the comment, however the NRC staff determined that the information in item 3.2.5 "Discussion" or now labeled as "REVIEWER'S NOTE," should not be revised or deleted as it provides an explanation on the NRC staff expectations on the subject issue.

Comment 2:

In several locations, the model application uses the term "allowed outage time." This term, used in Technical Specifications prior to the Improved Standard Technical Specifications, is inconsistent with the terminology used in TSTF-446. All occurrences of the term "allowed outage time" should be replaced with "completion time".

Disposition:

The NRC staff accepted the comment and replaced the term "allowed outage time" with "completion time" in the NoA.

Comment 3:

The model application and No Significant Hazards Considerations Determination state that the licensee is adopting Topical Report WCAP-15791. That is incorrect. The application is to adopt the Technical Specification changes presented in TSTF-446. The model application should be revised.

Disposition:

The NRC staff accepted the comment, and corrected the subject statement in the model application and No Significant Hazards Considerations accordingly.

Comment 4:

The model application contains sections labeled "discussion." It is unclear from these discussions whether the licensee is expected to include these sections in their applications. The wording in the "discussion" sections is inconsistent with the wording of a plant-specific amendment and appears to be guidance for the NRC reviewer. The sections should be clearly delineated as NRC Reviewer's Notes.

Disposition:

The NRC staff accepted the comment and replaced the term, "Discussion" with "Reviewer's Note," as it is more appropriate than "NRC Reviewer's Notes," suggested by the commentator.

Comment 5:

The model application both references the No Significant Hazards Consideration (NSHC) determination published in the Federal Register and confirms its applicability to the plant-specific license amendment request, and includes a copy of the NSHC determination as an attachment to the application. This is inconsistent with previous model applications published via the CLIIP which referenced the published NSHC. Requiring each licensee to resubmit the NSHC, without alteration, has no benefit to the licensee or the NRC. Furthermore, it is inconsistent with the treatment of the Environmental Consideration in the model application. It is recommended that the model application be revised to only reference the NSHC published in the Federal Register.

Disposition:

The NRC staff considered the comment, however, pursuant to the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.91(a), a licensee is required to submit a NSHC analysis with its amendment request. Section 3.0 is revised to emphasize the 10CFR50.91(a) requirements.

Comment 6:

In the "Applicability" section of the Notice and the "Applicability of Published Safety Evaluation" section of the model application, the Notice requires a licensee's plant-specific application to address or meet the requirements stated in Nuclear Energy Institute (NEI) 99-04, Revision 0, "Guidelines for Managing NRC Commitment Changes." NEI 99-04 is a voluntary industry standard which the NRC found to contain acceptable guidance for controlling regulatory commitments made by power reactor licensees to the NRC staff. NEI 99-04 was not referenced TSTF-446 or mentioned in the model Safety Evaluation. It is inappropriate for the NRC to impose a requirement to follow a voluntary industry standard when that standard was not proposed by the licensee or referenced as part of the NRC staff's Safety Evaluation for the change. The Notice and model application should be revised to delete the reference to NEI 99-04.

Disposition:

The NRC staff concurred that NEI 99-04 is not referenced in TSTF-446, however, the NRC staff safety evaluation (Reference 8) states, "The NRC staff finds that reasonable controls for the implementation and for subsequent evaluation of proposed changes pertaining to regulatory commitment(s) can be provided by the licensees' administrative processes, including their commitment management program. The staff has agreed that NEI 99-04 provides reasonable guidance for the control of regulatory commitments made to the staff (see Regulatory Issue Summary 2000-17, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff, dated September 21, 2000)." Therefore, the NRC staff believes that a licensee's application should address the Guideline which is also referenced in previously issued Notice of Availability for a related TSTF. The NRC staff revised the "Applicability" section of the NoA to state, "If a new commitment is necessary or an existing commitment is changed, the NRC staff expects the licensee to follow the guidelines stated in Nuclear Energy Institute (NEI) 99-04, Revision 0, "Guidelines for Managing NRC Commitment Changes," to ensure LERF and ILERP are addressed by the licensee's configuration risk management program.

Comment 7:

The Notice and the model application require submittal of plant-specific Probabilistic Risk Assessment (PRA) information which will be evaluated against Regulatory Guide (RG) 1.200, Revision 2, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk Informed Activities." The Notice and the model application should be revised to clarify that the risk associated with the Completion Time changes was justified in the generic Tier 1 analysis contained in WCAP-15791-NP-A, Rev. 2 and that the plant-specific PRA information to be provided should be limited to that information related to the technical adequacy necessary to perform a Tier 3 assessment in accordance with Section 2.3.7 of Regulatory Guide 1.177. Specifically, to provide assurance that there is PRA adequacy, completeness, and applicability with respect to evaluating the risk associated with the CIV Completion Time extensions, i.e., that the PRA model is, or will be capable of supporting CRMP assessments when a CIV is out of service. The containment isolation model in the PRA must ensure that all of the plant specific penetration configurations are considered. The

containment isolation fault tree can either: 1) contain CIVs for at least one of each of the penetration types contained in WCAP-15791-NP-A, Rev. 2 that are applicable to the plant that are greater than 2 inches in diameter and use an approach based on surrogates or 2) include all CIVs associated with the Completion Time extension for penetrations that are greater than 2 inches in diameter. Note that it is not required to model penetrations less than or equal to 2 inches in diameter, since a large release is not possible from a penetration of this size.

Disposition:

The NRC staff concurred that the RG 1.200 evaluation only needs to be addressed for the licensee's Tier 3 analysis if the Tier 1 and Tier 2 evaluations are bounded by the WCAP-15791-NP-A analysis.

Comment 8:

In multiple locations in Section 3.2 of the model application, it is stated that information is provided by the licensee; however the model application does not state where the licensee is to provide that information. A new attachment should be added to the model application to provide a location for the plant-specific information that needs to be provided.

Disposition:

The NRC staff accepted the comment and incorporated the recommended change into the model application as new Attachment 7 for the licensee to provide plant-specific information.

As clarified in Regulatory Issue Summary 2007-06, "Regulatory Guide 1.200 Implementation," dated March 22, 2007, the NRC staff will use RG 1.200 to assess the technical adequacy of all risk-informed applications received after December 2007. RG 1.200, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities," describes an acceptable approach for defining the technical adequacy of an acceptable base PRA. This assessment can be performed by directly comparing the base PRA to the supporting requirements in the endorsed American Society of Mechanical Engineers (ASME) Standard RA-Sb-2005 and addressing the NRC staff position on each requirement discussed in Appendix A to RG 1.200. Alternatively, a licensee can perform the assessment starting with the results of a previous peer review, performed in accordance with the process documented in NEI 00-02 and addressing the NRC staff position on each requirement discussed in Appendix B to RG 1.200.}

The licensee's submittal must discuss the plant risk associated with external events and specifically identify (quantitatively or qualitatively) that the impact of the proposed CIV CTs on the risk associated with external events is small. The licensee needs to confirm that any increase in external event risk associated with the proposed CIV CTs should be minimal. The licensee must address this impact and discuss why the risk of external events (including internal fires) is negligible. Insights from IPEEE screening or quantitative approaches may be used to support the licensee's evaluations.

If the licensee has performed an updated analysis of an external event since the NRC staff review of the licensee's IPEEE, and a quantitative PRA demonstration is used to support the submittal, the licensee needs to describe the significant changes involved in its updated analysis and the impact of these changes on plant risk associated with the external event and the proposed CIV CT extensions.

For external events for which the licensee has a PRA, the licensee needs to provide the change in CDF, the change in LERF, ICCDP (or ICDP) and ICLERP (or ILERP) associated with specifically analyzed external events. The licensee needs to also provide the total plant risk and total change in risk from all PRA contributors (the combination of internal events, internal flooding, internal fires, and external events). To conclude that the quantified risk associated with the proposed CIV CTs is acceptable, the total CDF and LERF values and the change in CDF, change in LERF, ICCDP (or ICDP) and ICLERP (or ILERP) must meet the acceptance guidelines of RG 1.174 and RG 1.177.

For external events not included in the plant PRA but that rely on a non-PRA method (e.g., seismic margins analysis or fire-induced vulnerability evaluation) to confirm that plant risk remains acceptable, the licensee must confirm the following: (a) that there are no vulnerabilities or outliers associated with these external events, (b) that any vulnerabilities or outliers that were identified have been resolved, or c) that appropriate plant modifications have been implemented according to the licensee's analysis.}