

# PWR Owners Group-NRC Meeting



Risk Informed Tech Spec Task Force Initiative 6: Add Required  
Actions and Completion Times for LCO 3.0.3 Entries

March 2, 2011

# PWR Owners Group-NRC Meeting

## RITSTF Initiative 6: Add Required Actions and Completion Times for LCO 3.0.3 Entries

### Agenda

- Purpose of the Meeting
- Background
- CE NSSS Program
- W NSSS Program
- Questions

# PWR Owners Group-NRC Meeting

## RITSTF Initiative 6: Add Required Actions and Completion Times for LCO 3.0.3 Entries

- Purpose of the Meeting
  - To present the PWROG's approach to address RITSTF Initiative 6 for W NSSS plants
  - Obtain Staff feedback

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## RITSTF Initiative 6: Add Required Actions and Completion Times for LCO 3.0.3 Entries

- Background
  - The Technical Specifications do not contain Required Actions and associated Completion Times for two inoperable trains of a system
  - Some of these Conditions are identified in the Technical Specifications and the Required Actions require LCO 3.0.3 to be entered immediately
  - Some of these Conditions are not identified in the Technical Specifications and LCO 3.0.3 is required to be entered since there is no Action for these Conditions

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## RITSTF Initiative 6: Add Required Actions and Completion Times for LCO 3.0.3 Entries

- Background (Cont'd)
  - Entering LCO 3.0.3 is not always the best action to follow when consideration is given to the risk impact of the action.
  - Often these systems associated with these Technical Specifications are not important to plant risk.

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## RITSTF Initiative 6: Add Required Actions and Completion Times for LCO 3.0.3 Entries

- CE NSSS Program: WCAP-16125-NP-A, Rev. 2, “Justification for Risk-Informed Modifications to Selected Technical Specifications for Conditions Leading to Exigent Plant Shutdown,” justified adding a Required Action and associated Completion Time to the following ventilation system Tech Specs in NUREG-1432:
  - TS 3.6.8, Shield Building Exhaust Air Cleanup System (SBEACS)
  - TS 3.6.10, Iodine Cleanup System (ICS)

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- CE NSSS Program: WCAP-16125-NP-A, Rev. 2, justified adding a Required Action and associated Completion Time to the following ventilation system Tech Specs in NUREG-1432 (cont.):
  - TS 3.7.11, Control Room Emergency Air Cleanup System (CREACS)
  - TS 3.7.12, Control Room Emergency Air Temperature Control System (CREATCS)
  - TS 3.7.13, ECCS Pump Room Exhaust Air Cleanup System (PREACS)
  - TS 3.7.15, PREACS

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- CE NSSS Program: WCAP-16125-NP-A, Rev. 2, justified adding a Required Action and associated Completion Time to the following additional Tech Specs in NUREG-1432:
  - TS 3.4.9, Pressurizer
  - TS 3.4.11, Pressurizer PORVs
  - TS 3.6.6A, Containment Spray and Cooling Systems



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## RITSTF Initiative 6: Add Required Actions and Completion Times for LCO 3.0.3 Entries

- W NSSS Program to justify adding a Required Action and associated Completion Time for several Tech Specs in NUREG-1431:
  - Separate justifications and travelers will be developed for ventilation and non-ventilation system Tech Specs
  - For ventilations systems:
    - No impact on CDF or LERF
    - Address impact on safety margins and defense-in-depth
  - For non-ventilation systems:
    - The approach followed will be consistent with RG 1.174 and 1.177.
    - Address impact on CDF and LERF, ICCDP and ICLERP
    - Address the impact on safety margins and defense-in-depth

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## RITSTF Initiative 6: Add Required Actions and Completion Times for LCO 3.0.3 Entries

- W NSSS Program to justify adding a Required Action and associated Completion Time to the following ventilation system Tech Specs in NUREG-1431:
  - TS 3.6.11, Iodine Cleanup System (ICS)
  - TS 3.6.13, Shield Building Air Cleanup System (SBACS)
  - TS 3.7.10, Control Room Emergency Filtration System (CREFS)
  - TS 3.7.11, Control Room Emergency Air Temperature Control System (CREATCS)

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## RITSTF Initiative 6: Add Required Actions and Completion Times for LCO 3.0.3 Entries

- W NSSS Program to justify adding a Required Action and associated Completion Time to the following ventilation system Tech Specs in NUREG-1431 (cont.):
  - TS 3.7.12, ECCS Pump Room Exhaust Air Cleanup System (PREACS)
  - TS 3.7.13, FBACS
  - TS 3.7.14, PREACS

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- W NSSS Program to justify adding a Required Action and associated Completion Time to the following ventilation system Tech Specs in NUREG-1431 (cont.):
  - Utilize the approach and reference the justification provided in WCAP-16125 and RAI response, which was approved by the NRC for these systems
  - The technical justification for the RAI response stated that it would be applicable to systems that perform the same function
  - Prepare a traveler that contains changes to only these systems in NUREG-1431

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## RITSTF Initiative 6: Add Required Actions and Completion Times for LCO 3.0.3 Entries

- W NSSS Program to justify adding a Required Action and associated Completion Time to the following Tech Specs in NUREG-1431 in a separate traveler:
  - TS 3.4.9, Pressurizer
  - TS 3.4.11, Pressurizer PORVs
  - TS 3.5.1, Accumulators
  - TS 3.6.6A, Containment Spray and Cooling Systems

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- W NSSS Program to justify adding a Required Action and associated Completion Time to the following Tech Specs in NUREG-1431 in a separate traveler (cont.):
  - TS 3.6.6C, Containment Spray System
  - TS 3.6.6D, Quench Spray System
  - TS 3.6.6E, Recirculation Spray System
  - TS 3.6.12, Vacuum Relief Valves

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- W NSSS Program to justify adding a Required Action and associated Completion Time to the following Tech Specs in NUREG-1431 in a separate traveler (cont.):
  - Justification will include a representative risk analysis as necessary to support the change
  - Impact on safety margins and defense-in-depth will also be addressed

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- Questions?