

Insights from Palo Verde Pilot of Draft NEI Fire PRA Guidance for Maintenance Rule (a)(4)

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Background

- For (a)(4) assessments, integrated PRA Model with Internal Events and Fire
- Use EOOS for On-Line Configuration Risk Management
- Risk Management Action Levels Set Using CDF and LERF Multipliers



Approach

- **Quantitative approach can be used for Maintenance Rule (a)(4) if the fire PRA and internal events PRA are of comparable level of detail**
 - ◆ Truncation level low enough to see impact of equipment taken out of service
 - ◆ Maintained current with plant design and operation
 - ◆ Does not need to meet RG 1.200 for (a)(4) application
 - ◆ Use existing plant processes and communication paths supporting (a)(4) and CRM



Results

■ Quantitative approach – Advantages for Palo Verde

- ◆ Allows use of current scope of equipment to be evaluated
- ◆ Evaluation process considers multiple systems impacted by maintenance
- ◆ Risk Management Actions apply to the combined CDF/LERF results (heightened station risk awareness, management approvals, etc.)



Plan for Palo Verde Implementation

- Use existing program and integrated PRA model
- Evaluating use of different criteria for setting risk management action levels (RMALs) to address potential for masking by internal events or fire contributors
- Evaluating having EIOS calculate internal events and fire separately

