

April 25, 2011

MEMORANDUM TO: William F. Burton, Chief
Rulemaking and Guidance Development Branch
Division of New Reactor Licensing
Office of New Reactors

FROM: Roy K. Mathew, Acting Chief /RA/
Electrical Engineering Branch
Division of Engineering
Office of Nuclear Reactor Regulation

SUBJECT: DRAFT BRANCH TECHNICAL POSITION 8-8, "ONSITE
(EMERGENCY DIESEL GENERATORS) AND OFFSITE POWER
SOURCES ALLOWED OUTAGE EXTENSIONS"

The purpose of this memorandum is to formally transmit the subject Standard Review Plan (SRP) sections to the organization responsible for the SRP update program for processing.

Licensees are requesting one-time or permanent extensions for their emergency diesel generators (EDGs) and offsite power sources allowed outage time (AOT), from the current 72 hours to 7-14 days, to perform online maintenance of EDGs and corrective maintenance on offsite power source. The staff evaluates each licensee's request for AOT extension from a deterministic as well as a probabilistic risk assessment aspect. The enclosed Draft Branch Technical Position (BTP) 8-8, "Onsite (Emergency Diesel Generators) and Offsite Power Sources Allowed Outage Extensions [Enclosure 1] documents the deterministic criteria the Electrical Engineering Branch (EEEEB) staff uses in reviewing such amendment requests. The purpose of this BTP is to provide this information to the staff as staff guidance to review the licensees' amendment requests seeking AOT extensions. The EEEB staff's criteria delineated in the BTP is not new and was used in the granting of onsite or offsite power source AOT extensions in the past. Enclosed is also an excerpt from SRP, NUREG-0800, Chapter 8, Section 8.1, Table 8-1, showing addition of BTP 8-8 [Enclosure 2].

Please take steps necessary to publish the enclosed draft guidance to solicit public comments.

Enclosures:
As stated

CONTACTS: Gurcharan Matharu, NRR/DE/EEEEB
(301) 415-4057

Vijay Goel, NRR/DE/EEEEB
(301) 415-3730

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GMatharu MConnell VGoel PSahay SSom
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TKoshy AHowe DHarrison ELenning

ADAMS Accession Number: ML111101603

OFFICE	NRR/DE/EEEB	NRR/DE/EEEB	NRR/DE/EEEB/(A)BC
NAME	VGoel	GMatharu	RMathew
DATE	04/25/2011	04/25 /2011	04/25/2011

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NUREG-0800
Draft BTP 8-8
(Enclosure 1)

U.S. NUCLEAR REGULATORY COMMISSION
STANDARD REVIEW PLAN

BRANCH TECHNICAL POSITION (BTP) 8-8

**ONSITE (EMERGENCY DIESEL GENERATORS) AND OFFSITE POWER SOURCES
ALLOWED OUTAGE TIME EXTENSIONS**

REVIEW RESPONSIBILITIES

Primary - Organization responsible for electrical engineering

Secondary - None

A. BACKGROUND

Regulatory Guide (RG) 1.93 [Reference 1] provides guidance with respect to operating restrictions, that is Allowed Outage Time (AOT), if the number of available onsite (emergency diesel generators (EDGs) and offsite power sources is less than that required by the Technical Specifications (TS). In particular, this RG prescribes a maximum AOT of 72 hours for an inoperable onsite or offsite power source.

Additionally, the regulatory evaluation that staff applies in its review of the licensee's request for proposed changes to LCOs were developed consistent with the objectives of the Commission's Probabilistic Risk Assessment (PRA) Policy Statement, "Use of Probabilistic Risk Assessment Methods in Nuclear Activities: Final Policy Statement," for enhanced decision making and will result in more efficient use of resources, improvement in safety, and reduction of unnecessary burden.

The following regulatory guidance provides the staff position:

- a. RG 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis," [Reference 2] describes a risk-informed approach, acceptable to the NRC [Nuclear Regulatory Commission], for assessing the nature and impact of proposed licensing-basis changes by considering engineering issues and applying risk insights.
- b. RG 1.177, "An approach for Plant-Specific, Risk-Informed Decision making: Technical Specifications," [Reference 3] describes an acceptable risk-informed approach specifically for assessing proposed TS changes in AOTs.

These RGs also provide acceptance guidelines for evaluating the results of such evaluations.

As noted in its approval of the policy statement on the use of PRA methods, the Commission stated an expectation that "the use of PRA technology should be increased to the extent supported by the state of the art in PRA methods and in a manner that complements the NRC's deterministic approach and supports the NRC's traditional defense-in-depth philosophy." The staff has defined an acceptable approach to analyzing and evaluating changes requested by licensees for AOT extensions. The staff approach supports the NRC's desire to base its decisions on the results of traditional engineering evaluations, supported by insights (derived from the use of PRA methods) about the risk significance of the proposed changes. Decisions concerning proposed changes are expected to be reached in an integrated fashion, considering traditional deterministic engineering evaluation that is supplemented by risk insights information. As stated in RG 1.177, the licensee should determine how the change impacts defense-in-depth aspects of the plant's design and operation and should determine the adequacy of safety margins following the proposed change. The licensee should consider how plant and industry operating experience relates to the proposed change, and whether potential compensatory measures could be taken to offset any negative impact from the proposed change.

NRC staff has been receiving license amendments requesting one-time or permanent extensions for the EDGs and offsite power sources AOT from the current 72 hours to 7-14 days to perform online maintenance of EDGs and offsite power sources. The purpose of this BTP is to provide guidance from deterministic perspective in reviewing such amendment requests.

B. BRANCH TECHNICAL POSITION

The Electrical Engineering Branch staff evaluates AOT extension requests for onsite or offsite power sources to allow on-line maintenance on EDGs that would normally be performed during refueling outages or maintenance of offsite power source(s) such as a transformer or bus. The on-line maintenance can help reduce the risk for loss of power during plant refueling outages when complicated refueling activities are conducted. The staff evaluates the licensee's request for AOT extension from deterministic as well as Probabilistic Risk Assessment (PRA) perspectives. The risk-impact evaluation is performed by the PRA Licensing Branch. The traditional deterministic evaluation is performed by Electrical Engineering Branch.

This BTP specifically discusses the defense-in-depth aspects for onsite and offsite power sources from a deterministic perspective. The staff requires that a supplemental power source be available as a backup to the inoperable EDG or offsite power source, to maintain the defense-in-depth design philosophy of the electrical system to meet its intended safety function. The supplemental source must have capacity to bring a unit to safe shutdown (cold shutdown)¹ in case of a loss of offsite power (LOOP) concurrent with a single failure during plant operation (Mode 1). According to NUREG-1784 [Reference 4], considering the changes in electric grid performance post-deregulation, the duration of LOOP events has increased and the probability

1. By "cold shutdown" it is not implied that the plant needs to go to cold shutdown during LOOP. The unit can remain in either hot shutdown or hot standby in accordance with its licensing basis for the short term. However if the offsite power is not recovered in a timely manner it may become necessary for the unit to go to cold shutdown, therefore the supplemental or AAC power source must have the capacity and capability to accomplish this function if needed.

of a LOOP as a consequence of a reactor trip has increased. This evaluation was done before the August 14, 2003, Blackout in the Northeast. The lessons learned from this Blackout event indicate that restoration of offsite power will take longer than previously considered indicating that post-deregulation conditions challenge grid reliability. The staff's objective of requiring an extra (i.e., supplemental) power source for an inoperable EDG or offsite power source is to avoid a potential Station Blackout (SBO) event during the period of extended AOT and to enable safe shutdown (cold shutdown) of the unit if normal power sources cannot be restored in a timely manner.

The current design of boiling-water reactor (BWR) and pressurized-water reactor (PWR) safety systems, required for reactor core decay heat removal and containment heat removal, are dependent on alternating current (AC) power. The projected time for restoration of offsite power is now considered to be more than the time previously evaluated for the SBO rule. The staff considers that a replacement (i.e., supplemental) AC power source is needed to backup an inoperable EDG or offsite power source during an extended AOT to maintain the defense-in-depth of the electrical power sources. The staff has previously granted AOT extensions to those licensees who have installed an alternate alternating current (AAC)² power source (i.e., additional diesels, gas or combustion turbines, hydro units, or other power sources) credited for SBO events which can be substituted for an inoperable EDG in the event of a LOOP, provided the power source has enough capacity to carry all LOOP loads to bring the unit to a cold shutdown without any load shedding.

In order to facilitate approval of an extended AOT for onsite or offsite power source, some licensees have installed commercial-grade diesel generators capable of supplying power to the required safe-shutdown loads on the train removed from service for the maintenance outage. Some licensees at multi-unit sites have qualified their existing EDGs as an AAC source for meeting the SBO rule requirements (see Reference 5 for qualifications of the AAC source). For existing Class 1E EDGs to qualify as a supplemental AC source in the adjacent unit (provided with cross-connection within the same division of loads) for extending the AOT, the EDGs must have excess capacity to meet its unit LOOP safe shutdown loads (without load shedding) while complying with the single failure criteria, and have spare capacity to support the other unit in maintenance to bring the plant to cold shutdown without any load shedding.

The permanent or temporary power source can be either a diesel generator, gas or combustion turbine, or power from nearby hydro units. This source can be credited as a supplemental source, which can be substituted for an inoperable EDG during the period of extended AOT in the event of a LOOP, provided the power source has enough capacity to carry all LOOP loads to bring the unit to a cold shutdown.

Multi-unit sites that have installed a single AAC power source for SBO cannot substitute it for the inoperable diesel when requesting AOT extensions unless the AAC source has enough capacity to carry all LOOP loads to bring the unit to a cold shutdown as a substitute for the EDG in an extended AOT and carry all SBO loads for the unit that has SBO event without any load shedding. The staff rationale is that if LOOP should occur during the period of extended AOT,

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2. The AAC power source is a supplementary AC power source, such as non-safety diesel or gas turbine that can be substituted as a replacement power source for an EDG to power one train of LOOP loads to take the plant to cold shutdown if necessary.

the single AAC power source for SBO must be dedicated to the unit without the extended AOT to meet the SBO rule. Therefore for the unit in extended AOT, the licensee must provide a permanent or a temporary power source as a substitute for the EDG in an extended AOT to maintain the same level of defense-in-depth for safe shutdown of the plant. The staff believes that relying on a single AAC power source for an SBO in one unit and an inoperable EDG in the adjacent unit erodes the defense-in-depth aspects of the plant's design and operation and thereby reduce the safety margins due to a planned extended AOT.

For some boiling water reactors, the Division III diesel generator (High Pressure Core Spray Pump (HPCS) diesel generator) may be used as a supplemental AC source. The staff has determined that the HPCS diesel generator can be considered a supplemental AC source provided cross-connect capability exists so that the HPCS diesel generator can be cross-connected to either Division I or Division II AC buses to power safe-shutdown loads. All support systems for HPCS diesel generator should be verified to be available during the extended AOT. The HPCS diesel generator should have the capacity to power LOOP loads to bring the unit to cold shutdown without any load shedding.

For plants using AAC or supplemental power sources discussed above, the time to make the AAC or supplemental power source available, including accomplishing the cross-connection, should not be more than one hour. The availability of AAC or supplemental power source should be verified within last 30 days before entering extended AOT by operating or bringing the power source to its rated voltage and frequency for 5 minutes and ensuring all its auxiliary support systems are available or operational. To support the one-hour time for making this power source available, plants must assess their ability to cope with loss of all AC power for one hour independent of an AAC power source. The plant should have formal engineering calculations for equipment sizing and protection and have approved procedures for connecting the AAC or supplemental power sources to the safety buses.

The EDG or offsite power AOT should be limited to 14 days to perform maintenance activities. This time period is based on industry operating experience; for example, a maximum of 216 hours (13.5 days, consisting of two shifts, each shift working 8 hours) is considered to be sufficient for a major EDG overhaul or offsite power major maintenance. The licensee must provide justification for the duration of the requested AOT (actual hours plus margin based on plant-specific past operating experience). An EDG or offsite power AOT license amendment of more than 14 days should not be considered by the staff for review.

The TS must contain Required Actions and Completion Times to verify that the supplemental AC source is available before entering extended AOT. The availability of AAC or supplemental power source shall be checked every 8-12 hours (once per shift). If the AAC or supplemental power source becomes unavailable any time during extended AOT, the unit shall enter the Limited Condition for Operation (LCO) and start shutting down within 24 hours. This 24-hour period will be allowed only once within any given extended EDG AOT. Additionally, the licensee must provide the following Regulatory Commitments:

- The extended AOT will be used no more than once in a 24 months period (or refueling interval) to perform EDG maintenance activities, or any major maintenance on offsite power transformer and bus.
- The preplanned maintenance will not be scheduled if severe weather conditions are

anticipated.

- The system load dispatcher will be contacted once per day to ensure no significant grid perturbations (high grid loading unable to withstand a single contingency of line or generation outage) are expected during the extended AOT.
- Component testing or maintenance of safety systems and important non safety equipment in the offsite power systems which can increase the likelihood of a plant transient (unit trip) or LOOP will be avoided. In addition, no discretionary switchyard maintenance will be performed.
- TS required systems, subsystems, trains, components, and devices that depend on the remaining power sources will be verified to be operable and positive measures will be provided to preclude subsequent testing or maintenance activities on these systems, subsystems, trains, components, and devices.
- Steam-driven emergency feed water pump(s) in case of PWR units, and Reactor Core Isolation Cooling (RCIC) and High Pressure Coolant Injection (HPCI) systems in case of BWR units, will be controlled as “protected equipment.”

In summary, in light of the recent experiences in grid outages, it is the staff’s position that the availability of an additional power source is a condition for approval of the extended EDG or offsite power AOT. Therefore, a supplemental power source must be available when extending the AOT for a single inoperable EDG or offsite power source beyond the current 3 days (72 hours). Licensees requesting an extension of the onsite or offsite AOT should either install permanently, or make available on a temporary basis, a supplemental AC source capable of powering the inoperable onsite or offsite power source bus LOOP loads during the period of AOT extension.

Although the installation of a supplemental power source could be temporary for only the time duration of the AOT, a permanent source would maintain multiple independent AC sources capable of providing power to necessary equipment needed for safe shutdown and also could reduce the core damage frequency due to a LOOP.

C. REFERENCES

1. RG 1.93, December 1974, “Availability of Electric Power Sources”
2. RG 1.174, November 2002, “An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis”
3. RG 1.177, August 1998, “An approach for Plant-Specific, Risk-Informed Decision making: Technical Specifications”
4. NUREG-1784, December 2003, “Operating Experience Assessment – Effects of Grid Events on Nuclear Power Plant Performance”
5. RG 1.155, August 1988, “Station Blackout”

PAPERWORK REDUCTION ACT STATEMENT

The information collections contained in the Standard Review Plan are covered by the requirements of 10 CFR Part 50 and 10 CFR Part 52, and were approved by the Office of Management and Budget, approval number 3150-0011 and 3150-0151.

PUBLIC PROTECTION NOTIFICATION

The NRC may not conduct or sponsor, and a person is not required to respond to, a request for information or an information collection requirement unless the requesting document displays a currently valid OMB control number.

Excerpt From NUREG-0800, Chapter 8, Section 8.1, Table 8-1

4.	Branch Technical Positions					
a.	BTP 8-1	Requirements on Motor-Operated Valves in the ECCS Accumulator Lines		G		
b.	BTP 8-2	Use of Diesel-Generator Sets for Peaking		G		
c.	BTP 8-3	Stability of Offsite Power Systems	G			
d.	BTP 8-4	Application of the Single Failure Criterion to Manually-Controlled Electrically-Operated Valves		G		
e.	BTP 8-5	Supplemental Guidance for Bypass and Inoperable Status Indication for Engineered Safety Features Systems		G	G	
f.	BTP 8-6	Adequacy of Station Electric Distribution System Voltages	G	G		
g.	BTP 8-7	Criteria for Alarms and Indications Associated with Diesel-Generator Unit Bypassed and Inoperable Status		G		
h.	BTP 8-8	Onsite (Emergency Diesel Generators) and Offsite Power Sources Allowed Outage Extensions	G	G		