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Vice President and
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May 12, 2010

Attention: Ms. Tanya Mensah
Document Control Desk
U. S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852

Subject: Transmittal of RAI Responses on Report; Nondestructive Evaluation: Probabilistic Risk Assessment Technical Adequacy Guidance for Risk-informed Inservice Inspection Programs. EPRI, Palo Alto, CA: 2008. 1018427 (Ref. EPRI Project Number 669)

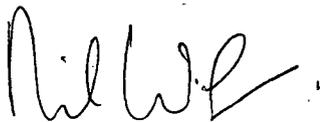
Dear Tanya:

Enclosed are responses to the second set of Request for Additional Information (RAIs) issued on EPRI Report "Nondestructive Evaluation: Probabilistic Risk Assessment Technical Adequacy Guidance for Risk-informed Inservice Inspection Programs." EPRI, Palo Alto, CA: 2008. 1018427. This report was transmitted as a means of exchanging information with the NRC for the purposes of supporting generic regulatory improvements with respect to application of risk-informed technology to inservice inspection (RI-ISI) programs.

EPRI report 1018427 has been developed to provide guidance in defining which technical elements and supporting requirements of the plant PRA are applicable to RI-ISI programs. Also, for those supporting requirements that are applicable to RI-ISI programs, this report provides guidance on the appropriate capability category. This guidance is provided for both EPRI's traditional RI-ISI methodology (EPRI TR-112657) and our streamlined RI-ISI methodology (ASME Code Case N716).

If you have any questions on this subject, please contact Patrick O'Regan (poregan@epri.com, 508-497-5045).

Sincerely,



NMW/po/tw

Enclosure

c: R. Bradley (NEI)
J. Lindberg (EPRI)
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S. Volk (Progress)

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RAI #1

In response to RAI 2, EPRI concluded that no changes were needed to the Table in Appendix A of the Topical that provides an assessment (i.e., a justification) for assigning acceptable capabilities categories for individual supporting requirements. In support of EPRI's proposal to accept Category I or Category Not-Met as sufficient for risk-informed inservice inspection (RI-ISI), EPRI's assessment states that the proposed capability category "provides resolution and specificity to identify the relative importance of the contributors at the system or train level, including associated human action." The two RI-ISI methods discussed in the topical report, one described in EPRI TR-112657, Revision B-A, "Revised Risk-Informed Inservice Inspection Evaluation Procedure," (Traditional) and the other described in ASME Code Case N-716, "Alternative Piping Classification and Examination Requirements, Section XI Division 1," (Streamlined), are based on absolute risk results in which the quantitative results are directly compared to a guideline value. There is no relative measure involved. In contrast to the "relative importance" assessment, other assessments for other supporting requirements refer to the RI-ISI methods as "absolute risk ranking and grouping approach" as justification for accepting conservative results (e.g., AS-A9). The reference to system and train levels also appears misplaced because RI-ISI is based on segments.

The NRC staff believes that the assessment category "provides resolution and specificity to identify the relative importance" is inconsistent with the methodologies and therefore provides no justification for the proposed capability categories. Please provide further explanations on the applicability of the relative and train level discussions to RI-ISI. Reevaluate your table in Appendix A without this assessment.

EPRI Response:

After further consideration, it appears that the use of the phrase *"provides resolution and specificity to identify the relative importance of the contributors at the system or train level, including associated human actions"* causes unintended confusion. This phrase is taken directly from the ASME Standard RA-Sb-2005 (Table 1.3-1) and its intent is to confirm that from a Scope and Level of Detail perspective, Capability Category I is sufficient to identify important contributors from a plant risk perspective. That is, although the term "relative importance" is used in Table 1.3-1 its context is that of a system or train's relative contribution to plant risk rather than from a relative risk ranking perspective or its use in a relative risk ranking effort. For example, for the applicable supporting requirements (e.g. SY-B1, SY-B11), PRAs meeting Capability Category I are capable of determining a system or train's contribution to plant risk (i.e. CDF/LERF). Given this discussion, TR 1018427 will be updated by replacing the phrase "the relative importance of" with the phrase "the importance of".

With respect to the statement regarding systems/trains versus segment, it is true that the RI-ISI program is based upon segments. However, information provided at the system or train is usually sufficient to support the applicable portion of the RI-ISI analyses. For the Traditional method, the consequence assessment required by section 3.3 of TR-112657, Revision B-A "Revised Risk-Informed Inservice Inspection Evaluation Procedure" provides additional guidance and criteria needed to complete the RI-ISI analysis, including the definition of segment boundaries [Note: please also see response to RAI #3]. For the Streamlined method, while the user has the option to do more detailed analyses, limiting the requirements to system/train level would at worst add piping to the high safety significant scope and therefore add inspections.

RAI #2

The response to Question 3b states that “*The PRA Technical Adequacy Guidelines contained in this report are the same whether the intended application is to develop a pre-service inspection (PSI) plan or an inservice inspection plan (ISI).*”

Describe in detail how the PRA is used to support PSI and explain how the design specific PRA and plant-specific PRA (during COL stage) are of sufficient quality to support the development of PSI plan.

[Note: the response below also addresses information requested by RAI #6]

EPRI Response:

Application of the EPRI Traditional RI-ISI method results in the subject piping being classified into seven risk categories (1 through 7). Consistent with ASME Non-Mandatory Appendix R, risk categories 1 through 5 are considered high safety significant (HSS). Also, consistent with Appendix R, piping classified as HSS should be subjected to PSI. Piping classified as low safety significant (LSS) does not require PSI. ASME Code Case N716 (EPRI Streamlined RI-ISI method) contains explicit PSI criteria. [Please note that revision 1 to N716 is currently being processed by ASME.]

As to the PRA itself, the ASME PRA Standard was originally developed in response to operating reactors. As such, there are a number of supporting requirements that are not achievable early in the plant design while there are others that can be achieved as the plant approaches operation and finally some others that can not be fully achieved until after plant operation. In recognition of this situation, there is an ASME ALWR working group currently developing guidance on this matter with revision to the PRA Standard the ultimate end-product.

With respect to RI-PSI and RI-ISI program development, Table RAI #2 – 1, provides a listing of supporting requirements (SRs) that have a variable degree of achievability during the transition from a DC PRA, to a COL PRA and finally to a fully operational plant PRA. Of the SRs listed in the table, per TR-1018427, 6 SRs need not be met in order to support the development of a RI-ISI/RI-PSI program. Of the remaining SRs listed in the table, 17 can be met for RI-ISI/PSI purposes, 29 can be fully (28) or mostly (1) met at Fuel Load and 23 can be fully met by the first inspection period (e.g. obtaining operating and maintenance data).

RI-ISI and RI-PSI have extensive experience with the operating fleet. This experience covers not only initial development of the RI-ISI program but numerous updates (periodic and interval updates) including re-submittal of the updated program to NRC for review and approval. This experience provides several advantages to the New Build fleet with respect to understanding the impact of a DC/COL PRA versus an operational plant PRA on RI-ISI/RI-PSI programs. Every plant (~90 % of the US industry) that has implemented a RI-ISI program has done so on piping that was not subjected to PSI per the ISI requirements defined in the RI-ISI program. Examples of this are as follows:

- Class 1 only RI-ISI applications: Examination categories B-F and B-J, require a volumetric PSI examination be conducted on larger bore piping (e.g. ≥ 4 NPS). This examination is consistent with some, but not all RI-ISI required examinations for large bore piping (e.g. volumes may be different). Additionally, smaller bore piping (< 4 NPS), which some RI-ISI applications have shown to be safety significant, are subjected to an outside diameter surface only PSI examination. Per RI-ISI, if this piping is selected for inspection (e.g. thermal fatigue), a volumetric examination is required. Thus, similar to some large bore locations, the PSI provides no benefit.

- Class 1 and 2 RI-ISI applications: In addition to the above discussion on Class 1 piping, only 7.5 percent of Class 2 piping receives any PSI at all. Thus, many Class 2 locations selected for inspection per the RI-ISI program were not previously subject to a PSI examination.
- Fullscope RI-ISI applications: Experience has shown that RI-ISI inspections were conducted on Code (e.g. Class 3) and non-Code (e.g. non safety-related) piping that had not received a PSI examination.

Thus, having a PSI conducted on every location that will be subjected to a RI-ISI inspection is not necessary. This experience and position is also consistent with criteria contained in ASME Non Mandatory Appendix R.

RI-ISI and RI-PSI programs also have unique aspects that are different from a number of other risk-informed initiatives. For example, the RI-ISI inspection population is spread out over a ten year inspection interval. There are minimum and maximum requirements as to how many inspections can be credited. That is, in the first inspection period, a minimum of 16 percent of the population must be inspected but no more than 50 percent can be credited. For the second inspection period, a minimum of 50 percent of the population must be inspected but no more than 75 percent can be credited, and for the third (final) period, all remaining inspections must be completed to reach 100 percent of the inspection population.

The RI-ISI program also has a living program component. This component requires that periodic and interval based updates be conducted, and the inspection population adjusted accordingly. As such, if a supporting requirement could not be met until the first inspection period is completed (e.g. DA-C2), the RI-ISI process requires that the RI-ISI analyses be updated to reflect this new information. If this new information increases or decreases the inspection population, the necessary change (add or delete inspections) will be implemented over the remaining two inspection periods thereby completing 100 percent of the inspection population by the end of the first inspection interval.

Finally, because of how the EPRI RI-ISI methodologies have been built (e.g. absolute ranking, large thresholds for binning consequence ranking with the Traditional method and conservative identification of HSS for the Streamlined method (e.g. all Class 1, all large bore BER)) only large changes in the PRA would be expected to have an impact on the RI-ISI results and therefore any significant change to the RI-ISI by PRA updates are not expected. This is not only an anticipation but has been borne out via numerous updates conducted on the operating fleet, including a number of plants that have upgraded their PRAs to better meet the requirements in the PRA standard.

One additional lesson learned from the operating fleet that provides further confidence in the stability of the New Build fleet RI-ISI programs, is that all of the Part52 plants (DCDs and COLAs) have committed to meeting SRP sections 3.6.1 and 3.6.2. Meeting the requirements contained in these two sections of the SRP provides for a robust design from a spatial separation perspective.

RAI #3

EPRI has included proposed flooding supporting requirement capability categories (i.e., the IF supporting requirements) to support both the “Traditional” and the “Streamlined” methods. The Traditional and Streamlined methods are substantively different and it is unclear whether the screening approach as described in the ASME standard elements for flooding analysis (the IF elements) is acceptable when applied to the Traditional method. The Traditional method requires an estimated conditional core damage probability and conditional large early release probability of every segment within the scope of the proposed program, while the streamlined approach only relies on the flooding analysis to identify any high safety significant (HSS) segments beyond the generic set of HSS segments. The flooding analysis described in the ASME standard RA-Sb-2005 (particularly the screening and grouping steps) is applicable to the N-716 method but does not appear to be applicable to the Traditional method which evaluates every segment failure in the scope of the program (and excludes every segment failure outside of the scope). Please describe the flooding analysis that is done to support the Traditional method and use this description to explain how the ASME flooding analysis SRs represent a necessary and complete characterization of an acceptable analysis using the Traditional method. If this characterization is possible, then explain what capability categories are needed for the Traditional method.

Please clarify how EPRI envisions the Topical to be referenced in a Traditional RI-ISI relief request.

EPRI Response:

Guidance for conducting the assessment of pressure boundary failure for the Traditional method is contained in section 3.3 of EPRI Report TR-112657, Rev B-A “Revised Risk-Informed Inservice Inspection Evaluation Procedure.” As noted in the PRA Standard, the requirements in the Standard need to be considered with respect to a specific risk-informed application, which in this case is RI ISI. The above EPRI report (TR-112657) provides the appropriate supplementary information needed to ensure that the risk-informed application is conducted in accordance with the PRA Standard for the traditional RI ISI method.

The Topical Report (TR 1018427) will be updated by deleting reference to IF supporting requirements for the Traditional method and by referencing the use of section 3.3 of EPRI Report TR-112657, Rev B-A “Revised Risk-Informed Inservice Inspection Evaluation Procedure”, as appropriate.

RAI #4

Please confirm the flooding analysis described in RA-Sa-2009 is unchanged from that described in RA-Sb-2005.

EPRI Response:

The transition from RA-Sb-2005 to RA-Sa-2009 aimed to restructure RA-Sb-2005 to include fire, seismic events and other external hazards and to consider internal flooding as a distinct PRA rather than a part of the internal events PRA. For internal flooding, the changes involved separating the IF supporting requirements into technical elements and establishing documentation requirements for each technical element, adding a high level requirement (HLR) related to documentation for each technical element, changing the HLR and SR designators and numbering, deleting the word “key” as it applied to assumptions and sources of uncertainty and some editorial changes. The one language change (a verb change) was made in IFEV-A2 (formerly IF-D3) for Capability Category II, where the language “AVOID subsuming” was replaced with “DO NOT SUBSUME”. This change does not affect the EPRI approach as our approach requires Capability Category I. In addition, the change is consistent with practices which implement the Standard.

RAI #5

It appears that the proposed capability categories required to support the Traditional versus the Streamlined RI-ISI methods differ for only one SR, IE-A4 in the Table in Attachment A in the Topical. In addition, the justification given for both the Traditional and the Streamlined capability category in supporting requirement IE-A4 is identical to the justification given for IE-A4a, however; IE-A4a concludes that the same capability category is required for the Traditional and the Streamlined analyses whereas IE-A4 concludes that different categories are required. Please clarify why there is a difference in capability categories between the traditional and streamlined approaches for these supporting requirements.

EPRI Response:

The proposed capability category for supporting requirement IE-A4 is different between the Traditional method and the Streamlined method. While it is certainly possible that capability category I (CCI) is sufficient for both approaches, it was felt prudent to increase the capability category for the Streamlined method. In the Traditional method, meeting CCI is sufficient as the consequence assessment conducted per section 3.3 of TR 112657, Revision B-A provides added assurance that all applicable initiating events are properly accounted for. As the Streamlined method relies on the plant PRA directly (i.e. a consequence assessment per TR 112657, Revision B-A is not performed) it was felt prudent to assign a higher capability category (i.e. CCII) for this supporting requirement thereby providing added assurance that all applicable initiating events are properly accounted for when applying the Streamlined method.

The above rationale will be added to Appendix A of TR 1018427 for supporting requirement IE-A4.

As to supporting requirement IE-A4a, the Topical states that CCI is sufficient for both methods. In this case, CCII is not required for the Streamlined method (as was the case for IE-A4), because it was felt that the systematic approach conducted in IE-A4 coupled with the evaluation contained in the IF supporting requirements (e.g. IF-D) provides a robust assessment of possible initiating events.

RAI #6

By letter dated December 15, 2009, in EPRI's RAI 3b, the statement is made that the PRA Technical Adequacy Guidelines provided in EPRI TR 1018427 are the same whether the application is to develop a PSI plan or an inservice inspection (ISI) plan. EPRI proposed to modify Sections 1 and 3 of EPRI TR 1018427 to address this statement.

Please discuss why this statement is true, the statement appears to conflict with earlier statements in response RAI 3b. Earlier in the 3b response, the statement is made that some of the supporting requirements discussed in the topical cannot be met until the plant is operational. Pre-service inspection programs are performed before the plant is operating. Should EPRI TR 1018427 describe which supporting requirements are not required to be met for development of a pre-service inspection program? Also in response 3b, the living program component of a RI-ISI program is discussed. Could the living program component identify items that should have been part of the original PSI program that may not have been?

EPRI Response:

Please see response to RAI #2 above.

TABLE: RAI #2-1

Sec ID 2008 (2009)	PRA Std / RG 1.200 Assessment	TR1018427 Assessment	TR1018427 Requirement
IE-A3 (IE-A3)	Plant-specific data may not be available Can be met at 1 st Period	Plant-specific data may not be available Can be met at 1 st Period	CCI/II/III
IE-A3a (IE-A4)	CCI/II can be met partially as some components may be unique	CCI/II can be met partially as some components may be unique Will be met via the RI-ISI living program component	CC I/II
IE-A4a (IE-A6)	CC II and III need routine alignment information which may not be available until plant operation	CC I can be met	CC I
IE-A6 (IE-A8)	CCII and III require interviews of "plant personnel" whom may not be assigned until post-DC PRA	CCI can be met	CC I
IE-A7 (IE-A9)	CCII and III require review of plant-specific operating experience which may not be available until 1 st Period	CCI can be met	CC I
IE-C1 (IE-C1)	Plant-specific data may not be available until 1 st Period. "Relevant" generic data needs to be selected.	Need not be met	Need not be met
IE-C1a (IE-C2)	Plant-specific data may not be available until 1 st Period	Need not be met	Need not be met
IE-C1b (IE-C3)	Procedures may not be available Can be met at Fuel Load	Procedures may not be available Can be met at Fuel Load	CCI/II/III
IE-C2 (IE-C4)	Plant-specific data may not be available until 1 st Period	Need not be met	Need not be met
IE-C3 (IE-C5)	CC I/II could be met by using an assumption CCIII can not be met until 1 st Period	Need not be met	Need not be met
IE-C5 (IE-C7)	CC III can not be met until 1 st Period	Need not be met	Need not be met
IE-C9	Procedures may not be available	Procedures may not be available	CCI/II/III

Sec ID 2008 (2009)	PRA Std / RG 1.200 Assessment	TR1018427 Assessment	TR1018427 Requirement
(IE-C11)	Can be met at Fuel Load	Can be met at Fuel Load	
IE-C12 (IE-C14)	Procedures may not be available Can be met at Fuel Load	Procedures may not be available Can be met at Fuel Load	CC I/II
AS-A5 (AS-5)	Procedures may not be available Can be met at Fuel Load	Procedures may not be available Can be met at Fuel Load	CC I/II/III
AS-B5a (AS-B6)	Procedures may not be available Can be met at Fuel Load	Procedures may not be available Can be met at Fuel Load	CC I/II/III
SC-A6	Procedures may not be available Can be met at Fuel Load	Procedures may not be available Can be met at Fuel Load	CC I/II/III
SY-A2 (SY-A2)	Procedures may not be available Can be met at Fuel Load	Procedures may not be available Can be met at Fuel Load	CC I/II/III
SY-A3 (SY-A3)	Procedures may not be available Can be met at Fuel Load	Procedures may not be available Can be met at Fuel Load	CC I/II/III
SY-A4 (SY-A4)	Plant staff / operating data staff may not be available Can be mostly met at Fuel Load and completely met at 1 st Period	Plant staff / operating data may not be available Can be mostly met at Fuel Load and completely met at 1 st Period	CC I
SY-A5 (SY-A5)	Procedures may not be available Can be met at Fuel Load	Procedures may not be available Can be met at Fuel Load	CC I/II/III
SY-A7 (SY-A7)	Detailed design information may not be available Can be met at Fuel Load	Detailed design information may not be available Can be met at Fuel Load	CC I/II
SY-A18 (SY-A19)	Operating experience may not be available Can be met at 1 st Period	Operating experience may not be available Can be met at 1 st Period	CC I/II/III
SY-A18a (SY-A20)	Operating experience and Procedures may not be available Can be met at 1 st Period	Operating experience and Procedures may not be available Can be met at 1 st Period	CC I/II/III
HR-A1 (HR-A1)	Operating experience and procedures may not be available Can be met at 1 st Period	Operating experience and procedures may not be available Can be met at 1 st Period	CC I/II/III
HR-A2	Operating experience and procedures may not be available	Operating experience and procedures may not be available	CC I/II/III

Sec ID 2008 (2009)	PRA Std / RG 1.200 Assessment	TR1018427 Assessment	TR1018427 Requirement
(HR-A2)	Can be met at 1 st Period	Can be met at 1 st Period	
HR-A3 (HR-A3)	Operating experience and procedures may not be available Can be met at 1 st Period	Operating experience and procedures may not be available Can be met at 1 st Period	CC I/II/III
HR-C3 (HR-D3)	Operating experience and procedures may not be available Can be met at 1 st Period	Operating experience and procedures may not be available Can be met at 1 st Period	CC I/II/III
HR-D3 (HR-D3)	For CC II/III plant procedures may not be available	CC I can be met	CC I
HR-D4 (HR-D4)	Procedures may not be available Note: SR is only relevant if applicable Can be met at Fuel Load	Procedures may not be available Note: SR is only relevant if applicable Can be met at Fuel Load	CC I/II/III
HR-D7 (HR-D7)	CC I/II can be met	CC I/II can be met	CC I/II
HR-E1 (HR-E1)	Procedures may not be available Can be met at Fuel Load	Procedures may not be available Can be met at Fuel Load	CC I/II/III
HR-E2 (HR-E2)	Procedures may not be available Can be met at Fuel Load	Procedures may not be available Can be met at Fuel Load	CC I/II/III
HR-E3 (HE-E3)	Procedures may not be available Can be met at Fuel Load	Procedures may not be available Can be met at Fuel Load	CC I
HR-E4 (HR-E4)	CC II/III require use of "simulator observations or talk-throughs..." which may not be possible until post DC PRA	CC I can be met	CC I
HR-F2 (HR-F2)	Procedures may not be available Can be met at Fuel Load	Procedures may not be available Can be met at Fuel Load	CC I
HR-G3 (HR-G3)	For CC II/III plant procedures may not be available Can be met at Fuel Load	CC I can be met	CC I
HR-G5 (HR-G5)	For CC II and III plant procedures may not be available or walkdowns / talkthroughs may not be possible Can be met at Fuel Load	CC I can be met	CC I

Sec ID 2008 (2009)	PRA Std / RG 1.200 Assessment	TR1018427 Assessment	TR1018427 Requirement
HR-G6 (HR-G6)	Procedures and operating experience may not be available Can be met at 1 st Period	Procedures and operating experience may not be available Can be met at 1 st Period	CC I/II/III
HR-G7 (HR-G7)	Procedures may not be available Can be met at Fuel Load	Procedures may not be available Can be met at Fuel Load	CC I/II/III
HR-H2 (HR-H2)	Procedures may not be available Can be met at Fuel Load	Procedures may not be available Can be met at Fuel Load	CC I/II/III
DA-B2 (DA-B2)	Procedures may not be available Can be met at Fuel Load	Procedures may not be available Can be met at Fuel Load	CC I/II
DA-C2 (DA-C2)	Plant-specific data may not be available Can be met at 1 st Period	Plant-specific data may not be available Can be met at 1 st Period	CC I/II/III
DA-C3 (DA-C3)	Plant-specific data may not be available Can be met at 1 st Period	Plant-specific data may not be available Can be met at 1 st Period	CC I/II/III
DA-C4 (DA-C4)	Plant-specific data may not be available Can be met at 1 st Period	Plant-specific data may not be available Can be met at 1 st Period	CC I/II/III
DA-C5 (DA-C5)	Plant-specific data may not be available Can be met at 1 st Period	Plant-specific data may not be available Can be met at 1 st Period	CC I/II/III
DA-C6 (DA-C6)	Plant-specific data may not be available Can be met at 1 st Period	Plant-specific data may not be available Can be met at 1 st Period	CC I/II/III
DA-C7 (DA-C7)	Plant-specific data may not be available Can be met at 1 st Period	CCI can be met	CC I
DA-C8 (DA-C8)	CCII/III require review of plant- specific operating experience Can be met at 1 st Period	CCI can be met	CC I
DA-C9	Plant-specific data may not be	Plant-specific data may not be	CC I/II

Sec ID 2008 (2009)	PRA Std / RG 1.200 Assessment	TR1018427 Assessment	TR1018427 Requirement
(DA-C9)	available Can be met at 1 st Period	available Can be met at 1 st Period	
DA-C10 (DA-C10)	Plant-specific data may not be available Can be met at 1 st Period	Plant-specific data may not be available Can be met at 1 st Period	CC I
DA-C11 (DA-C11)	Plant-specific data may not be available Can be met at 1 st Period	Plant-specific data may not be available Can be met at 1 st Period	CC I/II/III
DA-C12 (DA-C13)	Plant-specific data may not be available Can be met at 1 st Period	Plant-specific data may not be available Can be met at 1 st Period	CC I
DA-C13 (DA-C14)	Plant-specific data may not be available Can be met at 1 st Period	Plant-specific data may not be available Can be met at 1 st Period	CC I/II/III
DA-C14 (DA-C15)	Plant-specific data may not be available Can be met at 1 st Period	Plant-specific data may not be available Can be met at 1 st Period	CC I/II/III
DA-D1 (DA-D1)	CCII and III require review of plant-specific operating experience Can be met at 1 st Period	CC I can be met	CC I
DA-D2 (DA-D2)	Can be met. This SR also shows that other Data SRs may be supplemented by this approach	Can be met. This SR also shows that other Data SRs may be supplemented by this approach	CC I/II/III
DA-D4 (DA-D4)	For CC II/III, plant specific data may not be available Can be met at 1 st Period	CC I can be met	CC I
IF-A3 (IFPP-A4)	As-built and as-operated sources may not be available As-built can be met at Fuel Load As-operated can be met at 1 st Period	As-built and as-operated sources may not be available As-built can be met at Fuel Load As-operated can be met at 1 st Period	CC I/II/III
IF-A4 (IFPP-A5)	Walkdowns may not be possible Can be met at Fuel Load	Walkdowns may not be possible Can be met at Fuel Load	CC I/II/III

Sec ID 2008 (2009)	PRA Std / RG 1.200 Assessment	TR1018427 Assessment	TR1018427 Requirement
IF-B3a (IFSO-A6)	Walkdowns may not be possible Can be met at Fuel Load	Walkdowns may not be possible Can be met at Fuel Load	CC I/II/III
IF-C6 (IFSN-A14)	Procedures may not be available Can be met at Fuel Load	Procedures may not be available Can be met at Fuel Load	CC II
IF-C8 (IFSN-A16)	Procedures may not be available Can be met at Fuel Load	Procedures may not be available Can be met at Fuel Load	CC II
IF-C9 (IFSN-A17)	Walkdowns may not be possible Can be met at Fuel Load	Walkdowns may not be possible Can be met at Fuel Load	CC I/II/III
IF-D5a (IFEV-A6)	Noted information may not be fully available Most can be met at Fuel Load, Operating data can be met at 1 st Period	Noted information may not be fully available Most can be met at Fuel Load, Operating data can be met at 1 st Period	CC II/III
IF-D6 (IFEV-A7)	Maintenance procedures and experience may not be available Most can be met at Fuel Load, Operating data can be met at 1 st Period	Need not be met	Need not be met
IF-E5a (IFQU-A6)	Procedures may not be available Can be met at Fuel Load	Procedures may not be available Can be met at Fuel Load	CC I/II/III
IF-E8 (IFQU-A11)	Walkdown may not be possible Can be met at Fuel Load	Walkdown may not be possible Can be met at Fuel Load	CC I/II/III
QU-D1b (QU-D2)	Procedures and operating experience may not be available Can be met at 1 st Period	Procedures and operating experience may not be available Can be met at 1 st Period	CC I/II/III
QU-D3 (QU-D4)	CCII/III require review of similar plant results which may not be available	CC I can be met	CC I
LE-C2a (LE-C2)	For CC II/III procedures may not be available Can be met at Fuel Load	CC I can be met	CC I
LE-C2b (LE-C3)	For CC II/III applicability of available generic data needs to be confirmed.	CC I can be met	CC I

Sec ID 2008 (2009)	PRA Std / RG 1.200 Assessment	TR1018427 Assessment	TR1018427 Requirement
LE-C3 (LE-C4)	For CC II and III applicability of available generic calculations needs to be confirmed	CCI can be met	CC I
LE-C6 (LE-C7)	Procedures may not be available Can be met at Fuel Load	Procedures may not be available Can be met at Fuel Load	CC I/II/III
LE-D5 (LE-D6)	Procedures may not be available BWR – Not applicable PWR – Can be met at Fuel Load	Procedures may not be available BWR – Not applicable PWR – Can be met at Fuel Load	CC I
LE-E1 (LE-E1)	Procedures may not be available Can be met at Fuel Load	Procedures may not be available Can be met at Fuel Load	CC I/II/III