

Generic RAIs – Non-Pilot Topics

| No. | Topic-Generic Issue | Actions / Disposition | Ref. | Status/Comment | Callaway | DAEC | Cook | FCS | W3 LAR Audit |
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| 1 | Monitoring Program (ML113210461 - Slide 11) – Closure of FAQ 59 is necessary and clarification on use of maintenance rule | FAQ 59 will address this topic. | 11/18/11 Meeting ML113210461 ML113340218 ML120750108 | Added additional information added to Section 4.6 in LAR Template (Rev. 1N). Mirrors RAI responses for Callaway and DAEC FAQ 59, Rev. 5 sent to NRC 02/10/12. Technical agreement reached on 2/16/12. Task Force considers this issue closed. NRC agreed this issue closed 6/28/12. | Monitoring Program RAI 01 | Monitoring Program RAI 1 | RAI-12 | Monitoring Program RAI 01-a | Yes, under “Monitoring Program” Not identified in generic section of question. |
| 2 | Seismic standpipes/Hose Stations (ML113210461 -Slide 12) – The NRC wants additional information on the ability to fight fires following an earthquake. | Additional dialogue with the NRC is needed on this topic. | 11/18/11 Meeting ML113210461 ML113340218 | The exception to Section 3.6.4 is not endorsed. The NRC is asking licensees without seismic hose stations to discuss how they would fight a fire in the event of a seismic event. This seems to be in conflict with Section III. Comment Resolution on Proposed Rule in the Federal Register. Discussed at 4/26/12 FAQ meeting. This topic will be eliminated as a generic RAI and plant specific RAIs will be “pulled back” based on NRC discussion with legal staff. ML121370055 Discussed at the 5/24/12 FAQ meeting. LAR template note will suggest that licensees’ (operating plants and plants with construction permits issued prior to July 1, 1976 with non-seismic standpipes and hose stations previously approved in accordance with Appendix A to BTP APCS 9.5–1) utilize “complies via previous approval” for this Section of NPFA 805. Task Force considers this issue closed. NRC agreed this issue closed 6/28/12. | FP Eng. RAI 08 | FP Eng. RAI 9 | RAI-08 | None | Yes, FP Eng. 9 Not identified in generic section of question. |
| 3 | Total CDF/LERF (ML113210461-Slide 13) –NRC indicated that the last sentence on Slide 13 was incorrect and the CDF and LERF values should be E-06 and E-07, respectively. | Guidance on this topic is already in the LAR template (Rev. 1k), Section W.2 | 11/18/11 Meeting ML113210461 ML113340218 | Added “Note to LAR Developer” in Att. W. No technical change made to LAR Template (Rev. 1L). Task Force considers this issue closed. NRC agreed this issue closed 6/28/12. | During LIC-109 Review | None | During LIC-109 Review | None | During LIC-109 Review |
| 4 | FSAR (ML113210461-Slide 14) – Industry expressed concern that the NRC had changed their mind on this topic and is requesting information that previously had been identified as not necessary. NRC acknowledged the change in direction and referred to guidance in RG 1.174 and SRP 19.2 as some of the rationale for desiring information on FSAR content | Make FSAR content an attachment in NEI 04-02, Rev. 3, rather than part of the LAR. NRC desires general information, not an FSAR markup or detailed information. | 11/18/11 Meeting ML113210461 ML113340218 | This topic is not being handled consistently between the transitioning plants. Is there a need to treat this as a generic topic. Change made to LAR Template (Rev. 1L) Section 5.4 (Section 5.4 Transition Schedule renumbered to Section 5.5). Added “Note to LAR Developer” FAQ 12-0062 received technical agreement at FAQ meeting 5/24/12. Task Force considers this issue closed. NRC agreed this issue closed 6/28/12. | None | SSA RAI 5 | None | None | None |
| 5 | Defense-in-Depth/Safety Margin (ML113210461-Slide 15)– The NRC expressed concern that guidance on the process simply referred to NEI 04-02, rather than describing the process in the LAR. They indicated that they do not want detailed information by Fire Area. | LAR Template Section 4.5.2.2 to include additional information from FAQ 54 to address this concern | 11/18/11 Meeting ML113210461 ML113340218 | Change made to LAR Template (Rev. 1L) Section 4.5.2.2. Additional discussion with the NRC is needed to determine closure method. NRC to review LAR template discussion. | PRA RAI 18 | FP Eng. RAI 4 (for Att. L only) | RAI-24 | PRA RAI 9 PRA RAI 10 | Generic #5 |

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| 6 | Fire PRA Quality (ML113210461-Slide 16) – Inconsistent use of terms was the main concern (focused scope peer review, gap assessment, etc.) | The NFPA 805 TF will work with the Fire PRA TF to clarify terminology and update the LAR template, as necessary (Att. U, V). | 11/18/11 Meeting ML113210461 ML113340218 | <p>Added “Note to LAR Developer” to Tables U-1 and V-1 that discusses closure of F&Os, treatment of suggestion F&Os, and adequate documentation of F&O resolution. Fire PRA Task Force has lead on this topic.</p> <p>Revise the LAR template to add a note to LAR developer in Appendix U and V regarding clear and appropriate use of PRA terminology:</p> <ul style="list-style-type: none"> • Follow-on peer review: Occurs after the initial model peer review. Will cover the set of HLRs and SRs for the applicable FPRA technical elements in Section 4-2 of the ASME/ANS PRA Standard. May be focused scope or full scope (see NEI 07-12). • Focused scope peer review (preferred language vs. limited scope peer review): Limited...to only the SRs that are germane to a specific FPRA upgrade (e.g. re-evaluation of circuit failure probabilities) (see NEI 07-12). All technical elements affected by the upgrade should be included. • Gap assessment: See NEI 07-12 “If the most recent Internal Events PRA Peer Review was performed against an older version of the ASME/ANS PRA Standard and RG 1.200 (prior to Addendum B or Revision 0 of the Standard), a gap assessment is needed to assess whether the Internal Events PRA meets the latest NRC-endorsed ASME/ANS PRA Standard, per the guidance in NEI 05-04.” In other words, the gap assessment is not a peer review, and simply involves an assessment of the relevant changes in RG 1.200 and/or the ASME/ANS PRA Standard since the conduct of the peer review followed by an assessment of the PRA against those differences. This will generally be conducted by the model owner, but could be conducted by an outside entity. If a gap assessment is referenced in the LAR, the version of the document against which the gap assessment is performed should be clearly stated, as should the entity conducting the assessment. • Self-assessment: The host utility should perform a self-assessment against the guidance in this document and the FPRA Part of the Standard (see Section A.3.2). This self-assessment will help identify any known issues with the existing FPRA, and allow the utility a chance to either correct any issues or to disposition any self-assessment F&Os. (see NEI 07-12). These assessments are done by the model owner, not by an outside entity. • Full scope peer review: A peer review of the FPRA against all relevant SRs in Part 4 of the ASME/ANS PRA Standard. • F&O – Fact and Observation, a key point noted by the peer review team. The issue documented may be a weakness (finding), a strength (best practice), a simple observation (suggestion), or one regarding methods unfamiliar to the team (unreviewed analysis method). (See NEI 07-12) • Finding – an observation (an issue or discrepancy) that is necessary to address to ensure: the technical adequacy of the PRA (relative to a Capability Category), the capability/robustness of the PRA update process, or the process for evaluating the necessary capability of the PRA technical elements. • UAM – Unreviewed Analysis Method - an observation regarding the use of methods unfamiliar to the review team. Such an observation is appropriate when the review team does not possess the expertise necessary to evaluate the technical adequacy of methods used in the FPRA. (see NEI 07-12) • Deviation – no definition in NFPA 805 regulatory guidance. | Various | Various | Various | Various | Various |

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| 7 | Post-Transition Change Process (ML113210461-Slide 17) – The NRC wants to know more on site specific implementation. The industry expressed concern about being able to provide a lot of specifics with the LAR submittal. The NRC indicated that some level of detail on which site specific processes and procedures would be modified would need to be provided in the LAR | Guidance about this is provided in the LAR template (Rev. 1k) Section 4.7.2. FAQ 61 (under development) will help address this topic. | 11/18/11 Meeting ML113210461 ML113340218 | Added “Note to LAR Developer” in Section 4.7.2 of LAR Template (Rev. 1L) and referred to an example (Oconee RAI 7-05 Response Dated 9/27/10 ML102720409) and HNP RAI 7-01 dated 8/13/2009 (ML092320120) Task Force considers this issue closed. NRC to review LAR template discussion. FAQ 12-0061, Rev. 0 sent to NRC for review 7/6/12 (ML121910211). | None | PRA RAI 59 | None | None | None |
| 8 | Non-Power Operations (ML113210461-Slide 18) – The NRC wants more detailed information in the LAR on pre-fire actions to prevent spurious operation (e.g., removal of power to component) and recovery actions. | The TF will update the LAR template (Section 4.3.2, Att. D) to address this topic, rather than trying to revise FAQ 40. | 11/18/11 Meeting ML113210461 ML113340218 | Added “Note to LAR Developer” in Attachment D of LAR Template (Rev. 1L). Task Force considers this issue closed. NRC agreed this issue closed 6/28/12. | None | SSA RAI 6 | RAI-14 | None | None |
| 9 | B-2 Table (ML113210461-Slide 19) – The concern was that B-2 table statements should reference how the post-transition program meets the guidance, and not reference Appendix R or superseded documents. | The TF will review and see if additional guidance is needed in LAR template (Section 4.2.1, Att. B). | 11/18/11 Meeting ML113210461 ML113340218 | LAR Template Rev. 1O (Aug. 2012) - Added NOTE TO LAR DEVELOPER to LAR Template Section 4.2.1.1 to address concerns about this topic. | None | None | None | None | SSA-1 Not identified in generic section of question. |
| 10 | NEI 00-01 Rev. 2 (ML113210461-Slide 20) – Although FAQ 39 endorsed Rev. 1 of NEI 00-01 Chapter 3 in the B-2 table, the NRC referenced Rev. 2 of NEI 00-01 in RG 1.205 Rev. 1. The NRC would like a gap analysis of Rev. 2 vs. Rev. 1 of NEI 00-01 and a discussion of the gap analysis and results in the LAR submittal. | The NRC would like a gap analysis of Rev. 2 vs. Rev. 1 of NEI 00-01 and a discussion of the gap analysis and results in the LAR submittal (Section 4.2.1, Att. B).. | 11/18/11 Meeting ML113210461 ML113340218 | Added additional discussion and “Note to LAR Developer” to LAR Template (Rev. 1L) Section 4.2.1.1. Task Force developed a list of the ‘substantive change topics’ Task Force considers this issue closed. NRC agreed this issue closed 6/28/12. | SSA RAI 01 | SSA RAI 2 | RAI-19 | SSA RAI 1 | SSA 2 Not identified in generic section of question. |
| 11 | Safe and Stable (ML113210461-Slide 21) – The NRC would like a justification (qualitative risk analysis) if a defined time period is specified. | Guidance on this topic is already available in FAQ 54 and in the LAR template. (Section 4.2.1.2) | 11/18/11 Meeting ML113210461 ML113340218 | Additional reviews indicate that the NRC may desire a qualitative risk analysis even if a defined time period is not specified. LAR Template Rev. 1O (Aug. 2012) changed the NOTE TO LAR DEVELOPER in Section 4.2.1.2 of the LAR Template to address the NRC expectation that the information (qualitative risk assessment, additional actions) be provided regardless of whether a defined time period is defined in the LAR: | SSA RAI 6 (partial) | SSA RAI 4 | RAI-25 | SSA RAI 2 | Generic #6 |
| 12 | Complies with Clarification (ML113210461-Slide 22) – This concern was referencing an incorrect compliance statement. | It was believed that sufficient guidance exists on this topic. | 11/18/11 Meeting ML113210461 ML113340218 | Task Force to monitor to see if additional guidance is warranted. LAR Template Rev. 1O (Aug. 2012) - Added NOTE TO LAR DEVELOPER to LAR Template Section 4.1.1 to address concerns about this topic. | FP Eng. RAIs 1, 2, 5, 7, 9 | None | None | None | None |
| 13 | Redaction of Security Related Information (ML113210461-Slide 27) | NEI-NRC to work on approach | 11/18/11 Meeting ML113210461 ML113340218 | Discussed 6/27 – 6/28/12. NEI to revise template to remove redactions of entire statement and reference guidance from NRC (with decision on specifics ultimately left to individual plant processes). LAR Template Rev. 1O (Aug. 2012) removed redaction heading from Attachments C, D, G, S, and W and added discussion in new “NOTE TO LAR DEVELOPER” at beginning of LAR template. | None | None | None | None | None |

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| 14 | Treatment of FPRA Unreviewed Analysis Methods (UAMs) (ML113210461-Slide 61). | Industry needs clear understanding of how UAMs are treated and closed out. | 11/18/11 Meeting ML113210461 ML113340218 | NRC expectations on this topic were discussed at the 7/24/12 management meeting and are documented in the meeting summary (ML122200690). Fire PRA Task Force has lead on this topic. Revise the LAR template to add a note to LAR developer in Appendix V regarding addressing UAMs: The peer review report may include Unreviewed Analysis Method (UAM) level findings. Per NEI 07-12, a UAM is “an observation regarding the use of methods unfamiliar to the review team. Such an observation is appropriate when the review team does not possess the expertise necessary to evaluate the technical adequacy of methods used in the FPRA.” Should there be any such UAM-level F&Os in the final FPRA peer review report, they should be addressed as follows in the LAR: <ul style="list-style-type: none"> The text associated with the UAM-level F&O should be reported. The UAM-level F&O should be closed out by referencing a report documenting the conclusions of an independent/consensus review on the relevant methodology. If such a report is not available, appropriate sensitivity studies (see RG 1.174) should be conducted. | Various | Various | Various | Various | Various |
| 15 | NRC now asking for 10 CFR 50.48(c)(2)(vii) submittal for use of EPRI process for surveillance optimization uses. (Fort Calhoun, Callaway) | | Fort Calhoun, Callaway | New item discussed at 3/22/12 TF meeting. Need additional discussion with staff to determine path for closure. Industry working on generic response to this topic. Callaway submitted 10 CFR 50.48(c)(2)(vii) (LAR Att. L) submittal with 7/12/12 RAI response. | None (verbal discussions) | None | None | FPE RAI 6 | FP Eng. 2 Not identified in generic section of question. |

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| 16 | <p>FPRA - Sensitivity study on CPT factor 2.</p> <p>It was recently stated at the industry fire forum that the Phenomena Identification and Ranking Table Panel being conducted for the circuit failure tests from the DESIREEFIRE and CAROL-FIRE tests may be eliminating the credit for Control Power Transformers (CPTs) (about a factor 2 reduction) currently allowed by Tables 10-1 and 10-3 of NUREG/CR-6850, Vol. 2, as being invalid when estimating circuit failure probabilities. Provide a sensitivity analysis that removes this CPT credit from the PRA and provide new results that show the impact of this potential change on CDF, LERF, □CDF, and □LERF. If the sensitivity analysis indicates that the change in risk acceptance guidelines would be exceeded after eliminating CPT credit, please justify not meeting the guidelines.</p> | | <p>DAEC, Cook, Callaway RAIs, Waterford "generic" RAIs (#9)</p> | <p>New item discussed at 3/22/12 TF meeting.</p> <p>6/28/12 – Additional discussion needed on how to treat this Fire PRA topic (not necessarily as a LAR template item). NEI to work on how to treat Fire PRA topics likely to get extensive reviews/RAIs.</p> <p>NRC expectations on sensitivity studies were discussed at the 7/24/12 management meeting and are documented in the meeting summary (ML122200690).</p> <p>Fire PRA Task Force has lead on this topic.</p> <p>No revision to the LAR template suggested, however, the following is offered as a potential solution which applicants may consult if they receive this RAI.</p> <p>In response to the RAI, the fire PRA model and associated application calculations were updated to apply the higher conditional probability values. The result of this sensitivity study shows a CDF increase of approximately x % and an increase in the change in plant risk associated with the application of approximately y%.</p> <p><then chose one of the following></p> <p>These increases do not result in any of the risk metrics to exceed the acceptance thresholds described in (reference section of LAR).</p> <p><or></p> <p>These increases result in the (pick which metric) to be slightly above the acceptance threshold described in (reference section of LAR). However, the application is still judged to be acceptance because ... (provide justification).</p> <p><or></p> <p>These increases result in the (pick which metric) to be above the acceptance threshold described in (reference section of LAR). This insight resulted in the identification of (additional DID or plant modification) that will be implemented (update to Appendix S may be required) that will address this potential.</p> | PRA RAI 09-a | PRA RAI 12 | RAI-38 | PRA RAI 8 | Waterford "generic" RAIs (#9) |
| 17 | <p>Please describe how your evaluation includes the possible increase in heart (sic) release rate caused by the spread of a fire from the ignition source to other combustibles. Please summarize how suppression is included in your evaluation.</p> | | <p>Waterford "generic" RAIs (#1)</p> | <p>This is addressed by SRs within the PRA Standard.</p> <p>6/28/12 – Additional discussion needed on how to treat this Fire PRA topic (not necessarily as a LAR template item). NEI to work on how to treat Fire PRA topics likely to get extensive reviews/RAIs.</p> <p>Fire PRA Task Force has lead on this topic.</p> <p>No revision to the LAR template suggested. Licensees who receive this RAI should reference the peer review capability category assignments for FSS-C1, FSS-C2, and FSS-C4. and address the resolution of any findings associated with these SRs.</p> | Fire Modeling RAI -03 | ??? | None | PRA RAI 01 | Waterford "generic" RAIs (#1) |

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| 18 | Transient fires should at a minimum be placed in locations within the plant PAUs where CCDPs are highest for that PAU, i.e., at "pinch points." Pinch points include locations of redundant trains or the vicinity of other potentially risk-relevant equipment, including the cabling associated with each. Transient fires should be placed at all appropriate locations in a PAU where they can threaten pinch points. Hot work should be assumed to occur in locations where hot work is a possibility, even if improbable (but not impossible), keeping in mind the same philosophy. | | Waterford "generic" RAIs (#2) | <p>This is addressed by SRs within the PRA Standard.</p> <p>6/28/12 – Additional discussion needed on how to treat this Fire PRA topic (not necessarily as a LAR template item). NEI to work on how to treat Fire PRA topics likely to get extensive reviews/RAIs.</p> <p>Fire PRA Task Force has lead on this topic.</p> <p>No revision to the LAR template suggested. Licensees who receive this RAI should reference the peer review capability category assignments for IGN-A9 and FSS-A5 and address the resolution of any findings associated with these SRs.</p> | None | PRA RAI 14 PRA RAI 20 PRA RAI 4 | None PRA RAI-40 (2 nd Round) | PRA RAI 07-a | Waterford "generic" RAIs (#2) |
| 19 | Discuss the calculation of the frequencies of transient and hot work fires. Characterize your use of the influence factors for maintenance, occupancy, and storage, noting if the rating "3" is the most common, as it is intended to be representative of the "typical" weight for each influence factor. | | Waterford "generic" RAIs (#3, 4) | <p>This is addressed by SRs within the PRA Standard.</p> <p>6/28/12 – Additional discussion needed on how to treat this Fire PRA topic (not necessarily as a LAR template item). NEI to work on how to treat Fire PRA topics likely to get extensive reviews/RAIs.</p> <p>FAQ 12-0064 addresses this topic.</p> <p>Fire PRA Task Force has lead on this topic.</p> <p>No need for revision to the LAR template. This is addressed in existing parts of the LAR including the peer review report.</p> | PRA RAI 08-a | PRA RAI 14, 44 | RAI-34 RAI-39 | PRA RAI 07-a | Waterford "generic" RAIs (#3, 4) |
| 20 | Section 10 of NUREG/CR-6850 Supplement 1 states that a sensitivity analysis should be performed when using the fire ignition frequencies in the Supplement instead of the fire ignition frequencies provided in Table 6-1 of NUREG/CR-6850. Provide the sensitivity analysis of the impact on using the Supplement 1 frequencies instead of the Table 6-1 frequencies on CDF, LERF, □CDF, and □LERF for all of those bins that are characterized by an alpha that is less than or equal to one. If the sensitivity analysis indicates that the change in risk acceptance guidelines would be exceeded using the values in Table 6-1, please justify not meeting the guidelines. | | Waterford "generic" RAIs (#7) | <p>NRC expectations on this topic were discussed at the 7/24/12 management meeting and are documented in the meeting summary (ML122200690).</p> <p>Fire PRA Task Force has lead on this topic.</p> <p>No need for revision to the LAR template. This is addressed in existing parts of the LAR. Clarify with NRC staff that Supplement 1 is considered an "accepted method."</p> | PRA RAI 09-b | None | None | PRA RAI 01 | Waterford "generic" RAIs (#7) |
| 21 | Please describe how CDF and LERF are estimated in main control room (MCR) abandonment scenarios. Do any fires outside of the MCR cause MCR abandonment because of loss of control and/or loss of control room habitability? Are "screening" values for post MCR abandonment used (e.g., conditional core damage probability of failure to successfully switch control to the Primary Control Station and achieve safe 3 shutdown of 0.1) or have detailed human error analyses been completed for this activity. Please justify any screening value used. | | Waterford "generic" RAIs (#8) | <p>This is addressed by SRs within the PRA Standard.</p> <p>6/28/12 – Additional discussion needed on how to treat this Fire PRA topic (not necessarily as a LAR template item). NEI to work on how to treat Fire PRA topics likely to get extensive reviews/RAIs.</p> <p>Fire PRA Task Force has lead on this topic.</p> <p>No revision to the LAR template suggested. Licensees who receive this RAI should reference the peer review capability category assignments for FSS-B1, FSS-B2, and HR-G1 and address the resolution of any findings associated with these SRs.</p> | PRA RAI 07 | PRA RAI 19 | RAI-29 | SSA RAI 09 | Waterford "generic" RAIs (#8) |

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| 22 | Attachment W of the LAR provides the ..CDF and ..LERF for the variances from the deterministic requirements (VFDRs) for each of the fire areas, but the LAR does not describe either generically or specifically how ..CDF and ..LERF were calculated. Describe the method(s) used to determine the changes in risk reported in the Tables in Appendix W. The description should include: a) A summary of PRA model additions or modifications needed to determine the reported changes in risk. If any of these model additions used data or methods not included in the fire PRA Peer Review please describe the additions. b) Identification of new operator actions (not including post MCR abandonment which are addressed elsewhere) that have been credited in the change in risk estimates. If such actions are credited, how is instrument failure addressed in the HRA. | | Waterford "generic" RAIs (#10) | This is a candidate for revision to LAR template. Added section to Attachment W. LAR Template Rev. 1O (Aug. 2012) changed the NOTE TO LAR DEVELOPER Section W.2.1 to cross reference Generic RAIs 22 and 24 related to methods used to calculated change in risk. Fire PRA Task Force has lead on this topic. LAR template already revised to note that any changes following the peer review need to be noted. | PRA RAI 19 | PRA RAI 60 (generally) | RAI-32 PRA RAI-41 (2 nd Round, partial) | PRA RAI 11 | Waterford "generic" RAIs (#10) |
| 23 | Did the peer reviews for both the internal events and fire PRAs consider the clarifications and qualifications from Regulatory Guide (RG) 1.200, Revision 2, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk- Informed Activities," March 2009 (ADAMS Accession No. ML09041 0014) to the ASME/AMS PRA Standard? If not, provide a self-assessment of the PRA model for the RG 1.200 clarifications and qualifications and indicate how any identified gaps were dispositioned. | | Waterford "generic" RAIs (#11) | Added the following note to LAR Developer in Attachment U: LAR Template Rev. 1O (Aug. 2012) includes in NOTE TO LAR DEVELOPER Attachment U to provide a general discussion of the standards against which the Internal Events PRA has been reviewed. Ensure that RG 1.200 Revision 2 has been considered. 6/28/12 – NRC questioned RG 1.200 Rev. 2 for fire and asked to ensure guidance in LAR template addressed fire. Fire PRA Task Force has lead on this topic. A note regarding this has already been added to the LAR template. | PRA RAI 02 | None | RAI-20 PRA RAI-42 (2 nd Round) | PRA RAI 04, 14, 18 | Waterford "generic" RAIs (#11) |
| 24 | Identify if any variance from deterministic requirement (VFDRs) in the LAR involved performance-based evaluations of wrapped or embedded cables. If applicable, describe how wrapped or embedded cables were modeled in the Fire PRA including assumptions and insights on how the PRA modeling of these cables contributes to the VFDR delta risk evaluations. | | Waterford "generic" RAIs (#12) | See item 22. LAR Template Rev. 1O (Aug. 2012) changed the NOTE TO LAR DEVELOPER Section W.2.1 to cross reference Generic RAIs 22 and 24 related to methods used to calculated change in risk. Fire PRA Task Force has lead on this topic. | None | PRA RAI 23 | None PRA RAI-43 (2 nd Round) | None (some FP questions on ERFBS) | Waterford "generic" RAIs (#12) |
| 25 | Identify any plant modification (implementation item) in Attachment S of the LAR that have not been completed but which have been credited directly or indirectly in the change-in-risk estimates provided in Attachment W. When the effects of a plant modification has been included in the PRA before the modification has been completed, the models and values used in the PRA are necessarily estimates based on current plans. The as-built facility after the modification is completed may be different than the plans. Please add an implementation item that, upon completion of all PRA credited implementation items, verifies the validity of the reported change-in-risk. This item should include your plan of action should the as-built change-in-risk exceed the estimates reported in the LAR. | | Waterford "generic" RAIs (#13) | Added a note to LAR developer in Attachment S. The task force considers this issue closed. Task Force considers this issue closed. NRC to review LAR template discussion. | None | None | None PRA RAI-44 (2 nd Round) | PRA RAI 13 | Waterford "generic" RAIs (#13) |

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| 26 | Please identify any changes made to the internal events or fire PRA since the last full scope peer review of each of these PRA models that are consistent with the definition of a "PRA upgrade" in ASME/ANS-RA-Sa-2009, as endorsed by Regulatory Guide 1.200. Also, please address the following: i) If any changes are characterized as a PRA upgrade, please identify if a focused scope peer review was performed for these changes consistent with the guidance in ASME/ANS-RA-Sa-2009, as endorsed by Regulatory Guide 1.200, and describe any findings from that focused-scope peer review and the resolution of these findings for this application. ii) If a focused-scope peer review has not been performed for changes characterized as a PRA upgrade, please describe what actions will be implemented to address this review deficiency. | | Waterford "generic" RAIs (#14) | This is a candidate for revision to LAR template. LAR Template Rev. 1O (Aug. 2012) includes in NOTE TO LAR DEVELOPER Attachment U to a discussion of this topic. Fire PRA Task Force has lead on this topic. Add a note to the LAR template as follows: If the internal events PRA or fire PRA has been changed since the peer review, the differences between the current model and the model as last peer reviewed should be given in the LAR. | None | None | None PRA RAI-45 (2 nd Round) | PRA RAI 18 | Waterford "generic" RAIs (#14) |
| 27 | During the 5/24/12 public meeting the NRC asked that the licensee identify deviations from NUREG/CR 6850 methods including those that involve justifications. | The staff has noticed that this has been treated inconsistently in the submittals. | | NRC expectations on this topic were discussed at the 7/24/12 management meeting and are documented in the meeting summary (ML122200690). Fire PRA Task Force has lead on this topic. Industry requests clear definition for deviation, with strong regulatory basis for definition, prior to changing LAR template or taking further action. Suggest that "key assumption" be the basis for identification of differences. | | | | | |
| 28 | Issues related to IEEE-383 cable qualifications <ul style="list-style-type: none"> From a Chapter 3 standpoint, IEEE-383 qualification only deals with FLAME SPREAD Assumptions related to damage threshold in either the Fire PRA or Fire Modeling Performance-Based Approach must be based on the material characteristics | | 6/27/12 Public Meeting (Slide 8) | This is not necessarily a LAR template item, but a topic that should be understood by licensees in preparation of the LAR. | | | | | |
| 29 | NFPA 805 Quality Section 2.7.3 – Unlike the pilots, some licensees are not committing to compliance to NFPA 805 Section 2.7.3 for future engineering analyses <ul style="list-style-type: none"> Review Verification and Validation Limitations of Use Qualification of Users Uncertainty Analyses | | 6/27/12 Public Meeting (Slide 9) | Candidate for LAR template revision. LAR Template Rev. 1O (Aug. 2012) - Added NOTE TO LAR DEVELOPER to LAR Template Section 4.7.3 to address concerns about this topic. | | | | | |
| 30 | Clarification needed on risk and delta risk criteria related to credit for modifications, additional risk of recovery actions | | 6/27/12 Public Meeting PRA Slides (Slide 5) | Need additional discussion with NRC on this topic. Candidate for LAR template revision after clarification obtained and agreed upon. Fire PRA Task Force has lead on this topic. Change Attachment W of LAR template to reflect that CDF, LERF, delta CDF, and delta LERF should be discussed. Request clarification from staff on specific areas of concern. | | | | | |

Legend

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| | Generic Topic Closed – Discussed with NRC in public meeting and mutual |
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Generic RAIs – Non-Pilot Topics

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| | understanding that the topic does not warrant additional discussion as a “Generic Topic” or “Generic RAI”. |
| | Topic is related to Fire PRA. NEI’s Fire PRA Task Force will have the lead role in addressing this topic. |