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To: [Miller, Ed](#); [Cook, Christopher](#)
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Subject: Fwd: Slide package on response to NRC comments
Date: Thursday, February 21, 2013 7:45:17 AM
Attachments: [Highlights of Changes to Working Example.pptx](#)
[ATT00001.htm](#)

Chris, Ed;

Here are some slides to guide our discussion on our IA ISG example of scenario based mitigation evaluation.

Jim Riley
Sent from my iPhone

Begin forwarded message:

From: "Schneider, Raymond E" <schneire@westinghouse.com>
Date: February 20, 2013, 11:06:29 PM EST
To: "RILEY, Jim" <jhr@nei.org>
Cc: "Attarian, George" <george.attarian@pgnmail.com>
Subject: Slide package on response to NRC comments

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Highlights of NRC Comments: Changes to Working Example

Integrated Assessment Scenario Example



Overview of Changes Made to Working Example

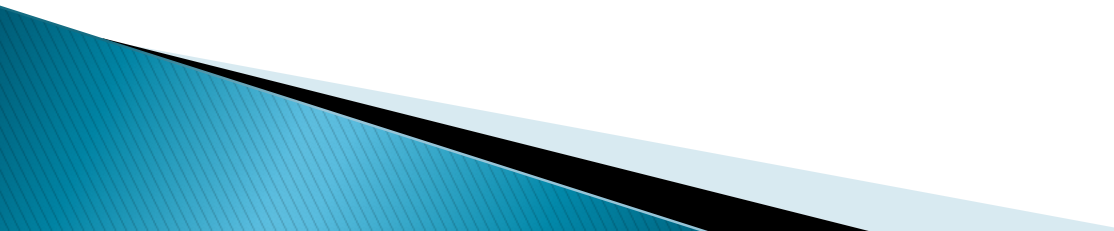
Format /Organization Changes

- ▶ A Preface has been added to capture key overarching considerations associated with the scope and content
- ▶ Table of Contents has been added
- ▶ Introductory paragraphs have been added to many sections to put the scope of the section into context
- ▶ Overview paragraphs provide additional discussion of Section content

Scenario discussion Changes

- ▶ Scenario discussion has been expanded to include other hazards (2.3)and “indefinite” operation (2.4)
- ▶ Timeline has been modified to include a column to be used to link timeline to HRA
- ▶ EXCEL file has been updated to differentiate investment protection and safety function support activities. Additional discussion on EXCEL file also included.
- ▶ Section 6, example discussions of equipment reliability have been expanded. A special tool example discussion has been added
- ▶ HRA actions have been categorized into administrative, normal actions (not influenced by flood event) and flood specific and example HRA assessments for each category are provided. Additional work in this area is expected.

Areas of Focus / Discussion

- ▶ Example specificity vs. Example design
 - ▶ Extent to which procedure content to be repeated in example.
 - ▶ Credit and justification for maintenance programs
 - ▶ Relation between re-evaluated hazard “run-up” and environmental factors for HRA.
 - ▶ Treatment of Uncertainty (margin vs. uncertainty assessment)
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NRC Comments/Key Changes

NRC Comments	Working Draft
NRC 1/2/3/6: Structural / Format	Added Preface , Table of contents, additional comments in introduction and added column in Table 2 and provided additional details with respect to linking and “cross referencing “ sections and clarifying information flow.
NRC 1:Physics of Strategy	Not expanded. Added Preparer” Notes to illustrate T&H supporting mitigation strategies
NRC 1: More discussion of Instrumentation /cues	Not expanded. Preparer is instructed to provide adequate description of how instrument used. Some expansion in discussion of HRA as it relates to cues.

NRC Comments/Key Changes

NRC Comments	Working Draft
NRC 1/4/5/7/15: Expand Preparer's Notes–Section 1	Multi-Unit: Not yet added.
	High Confidence Other Mechanisms Sunny Day not generic Added text on instrumentation/power
NRC 8:NAVD88	Done
NRC 9: Expand HRR List	Other hazards added
NRC 10: Preparer's Note :Weather	Modify to maintain nominal conditions.
NRC 11: Add Flood height Ruler	Done
NRC 12: Clarify applicability of strategy	Done
NRC 13:Durable agreements	Will note.
NRC 14: Expand Procedure Details	Reference procedures, key summary information. Not full statement of procedure details

NRC Comments/Key Changes

NRC Comments	Working Draft
NRC 15:Add note on instrumentation	Done
NRC 16:topography	Done
NRC 17: Air Support	Added footnote
NRC 18 ASCE-70	Standard not repeated
NRC 19: Testing in spring	Not changed. States a fact not credited.
NRC 20: Describe test procedure	Not included. Too Much detail
NRC 21: Locked valves	Done
NRC 22:Instrumentation	Added as a class
NRC 23:Simplified P&ID	Done

NRC Comments/Key Changes

NRC Comments	Working Draft
NRC 24: Added discussion of EXCEL File	Done
NRC 26 to NRC 36: Table 2 Modifications	Did not address PTS. Did not add additional info on plant modes. Added clarifications and additional column for linkage
NRC 37: RHR?	Reached at 6 hours

NRC Comments/Key Changes

NRC Comments	Working Draft
NRC 38: Downward branches	Not modified. Low likelihood end states going to core damage discussed at end of section. Preparer's note will be added
NRC 39/40: Pre Flood Actions	Additional detail provided in HRA sections
NRC 41–44:	Not changed. Desire to emphasize reliability of actions
NRC 45: Put in Table form	Not addressed (optional)
NRC 46: Increase clarity of logic diagram	Figure can be expanded in next version
NRC 47: terminology change	Severe Flood DG (SFDG)–Not temporary
NRC 48: seismic event impact pump?	No. hence basis for seismically robust
NRC 49: air support/weather	Not addressed (air)
NRC 50: Wording change	Will change “paragraph” to “Section”

NRC Comments/Key Changes

NRC Comments	Working Draft
NRC 51: Expand preparer's note	Added discussion on seismic event in preparer's note
NRC 52: Test timing not relevant	No change
NRC 53: Expand definition of equipment that changes state	Added flood specific special component (See Table 6 and 6-E (spool piece for installation))
NRC54:Justify availability	Provide reference to procedures. See also expanded Table. Not expected to have much unavailability and operational data
NRC 55: Add Instrument to table	Added instrumentation to Table 5
NRC56:Justify Test Interval	Not addressed. Maintained adequately via plant programs.
NRC 57:Why information not available	Not addressed
NRC58: Reliability reflects safety comp.	Expect equipment to be well maintained
NRC 59:psychological stress	Expanded Psychological discussion
NRC 60: Add Administrative actions to list	Expanded discussion on admin actions

NRC Comments/Key Changes

NRC Comments	Working Draft
NRC 61. Add sources of information to preparer's note	Section requires simulations, training and guidance/procedures.
NRC 62: Add supplemental Tables for HRA other than environmental	Added extended discussion for example actions and expanded discussion of those factors within table
NRC 63: Consistency check	Not complete
NRC 64:Question	Actions are proceduralized. Added regulation
NRC 65: Summarize non routine procedures	Added to preparer's notes
NRC 66: Add Human Action discussion	Added discussion section for examples (incomplete)
NRC 67: Tables for more PSFs	Will handle in discussion
NRC 68: Choose rep. Examples	Included DM action, Flood specific install and one with special equipment
NRC 69: Add Moderate category	Done

NRC Comments/Key Changes

NRC Comments	Working Draft
NRC 70: Why DG are not special equipment	Not added. Considered spool piece as special equipment
NRC 72: Actions should be broken down	Example timeline for a grouped action provided in discussion in Section 10.1.3.2
NRC 73: Use of satellite phone	Will add that use of phone has been evaluated
NRC 74–76	Uncertainty Section. Treated as margin