

Gallagher, Carol

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**From:** Stanislav Hustak <hus@ujv.cz>  
**Sent:** Monday, May 27, 2013 5:25 AM  
**To:** INFOCOLLECTS Resource  
**Subject:** Response from "Comment on NRC Documents"

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Stanislav Hustak ([hus@ujv.cz](mailto:hus@ujv.cz)) on Monday, May 27, 2013 at 05:25:23

Document\_Title: NUREG-1855 Rev. 1

Comments: Reference to Section 5.2.1.

The qualitative screening criterion in the first bullet can result in the screening of dominant risk contributors from the analysis. It should be therefore removed from the examples in NUREG-1855 (unless rephrased or completed) to avoid misusing.

Rationale:

The criterion for screening "The contributor or hazard does not result in a plant trip (manual or automatic) or require an immediate plant shutdown, and does not impact any SSCs that are required for accident mitigation." is presented as an acceptable qualitative screening criterion, but its correctness outside at-power operation is very questionable and this aspect is not mention there.

Any event in the plant occurred during shutdown states would fulfill the first part of the criterion. There are also many events occurred during shutdown, which do not affect any SSCs required for accident mitigation (the second part of the criterion), but which can still be important contributors in LPSD PRAs. The examples of events, which would be screened out according to this criterion (since they fulfill all conditions to be screened out), are: inadvertent boron dilution due to human error (no SSC is normally affected), LOCA due to pipe rupture when RCS is pressurized during transient shutdown states, RCS draindown due to human error (e.g. misopening or misalignment of valves), etc.

organization: UJV Rez, a. s.

address1: Hlavni 130

address2:

city: Husinec - Rez

state: ---Selected---

zip: 25068

country: Czech Republic

phone:

4/15/2013

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Add= M. DROUIN (mxd)