From: RILEY, Jim

To: <u>Cook, Christopher; Miller, Ed</u>

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Dane R. (INPO); Wrobel, George; Yale, Bob

Subject: Scenario Based Integrated Assessment Example: Topics for Discussion

Date: Wednesday, October 23, 2013 3:04:37 PM
Attachments: NRC Comment Resolution-Table - 1.xlsx

Chris, Ed;

Attached is the matrix we created that describes the comments we have received on the scenario based example. It includes our notes on disposition. We would like to discuss all the comments highlighted in yellow tomorrow. In addition, we would like to discuss the following comments from the latest list of comments sent to us in early October:

- Request: The integrated assessment ISG Section A.1.2.1 includes the following:
 - o The availability and reliability of active components (e.g., pumps, valves) should be justified using:
 - o •operational data
 - o •performance criteria (e.g., see Table A1)
 - o •consideration of operational requirements:
 - o surveillance
 - o inspection
 - o design control
 - o maintenance
 - o procurement
 - o testing and test control

If applicable, licensees should further use the following to justify the availability and reliability of active components and features:

- o incorporation of equipment in plant programs (e.g., whether the component is included in established plant equipment reliability programs or subject to 10 CFR Part 50, Appendix B)
- o conformance to consensus standard developed for similar uses, including emergency uses (e.g., standards developed by the National Fire Protection Association for fire protection equipment)

In addition, when information is available, the reliability of active components (e.g., failure to start on demand and failure to run once started) should be quantitatively evaluated and documented based on operating experience, testing, and other available information using

traditional probabilistic risk assessment or statistical techniques. In some cases, this information may not be available. In this case, tests or analyses may be appropriate to support quantification of reliability. If information is not available and testing is not feasible, the integrated assessment submittal should: (1) describe why quantification of equipment reliability is not possible or necessary; and (2) justify why the equipment can be reasonably credited despite these limitations.

It is not clear to staff that all aspects of Section A.1.2.1 are addressed in the example and it does not appear that the user would understand all the considerations that should be applied.

Editorial suggestion to address above request:

- o To ensure that all sections are addressed by the user in an actual submittal (even if a particular criteria is not addressed in the example), consider including separate subsections for each item.
- o Fx:
- o 4.1 Overview
- o 4.2 Operational data
- o 4.3 Performance criteria [this is where table A-1 would be included]
- o 4.4 Incorporation in existing plant programs
- Clarification needed: The RRCs are assumed available after 72 hrs. What is the implications of the RRCs for the equipment in the first 72hrs?
- Request: Note that the integrated assessment ISG (section A1.2.1) states what should be provided if reliability cannot be quantified:

"In this case, tests or analyses may be appropriate to support quantification of reliability. If information is not available and testing is not feasible, the integrated assessment submittal should: (1) describe why quantification of equipment reliability is not possible or necessary; and (2) justify why the equipment can be reasonably credited despite these limitations."

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Specified in the scenario overview Section 2.2 Suggestion: Specify time required to complete shutdown. Timeline has been updated.	38	Suggestion: Specify time required to complete shutdown.	

Segression Provide an expanded discussion of the status of the plant to p., ECT and to the provide of segression that she delivery to the second or featurable production that the provided discussion is noticed 2.2 and section 3. Appendix of the provided discussion is noticed to the provided discussion of the provided			
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Suggestion Change or "Effect" Accelerate Millifestion model for all succided class considered? Note the definition in the Registrosis of the Section of Section 1 and Sec	40	Suggestion: Here, and throughout the document, considering eliminating specific numbers	Agreed, unless it was required to convey the intent of the example, see section 3
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Suggestion: Provide examples of "concurrent issues" as part of the footnote: Consistent with FAQ Consistent with FAQ Consistent with FAQ	54	example of how to justify that roadways, etc. will be open when in fact debris or other	Include discussion about site accessibility
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77 Question/clarification needed: Where is the basis for this conclusion provided? See Section 2.2 78 Question/clarification needed: Where is the basis for this conclusion provided? See Section 3	76	Clarification needed: Clarify that this statement implies that either DG can power either	Described in section 3
	77		See Section 2.2
Overtices Assessed of these partices are bound individually?	78	Question/clarification needed: Where is the basis for this conclusion provided?	See Section 3
Question. Are each of these actions evaluated individuality:	79	Question: Are each of these actions evaluated individually?	will discuss in HRA section and reference here

80	Questions/clarification needed: Where is the key stored? Is there only one key? Who has	Key has been eliminated	
81	access to the key? The key is not mentioned in Table 6. Question/clarification needed: How is flow to the SGs being controlled throughout the	Discussion has been added to the document.	
	event? The instrumentation below appears to address sensing and displaying parameters Question/clarification needed: Is cable required for connecting the DGs to any other		
82	equipment? Question/clarification needed: Clarify how this piece of equipment differs from the SG	No, described in section 3	
83	level monitor referenced below. Also, why aren't PZR level and other instrumentation Suggestion: Include core exit thermocouples. At TMI, elevated pressurizer levels did not	Clarified	
84	automatically mean adequate core cooling.	No reason to add core exit thermocouples; this condition is not a severe accident	
85	Suggestion: Provide information about procedures that require this information and the resolution of the information for all instrumentation in this table.	This information has been added to Section 3 and maintaining the KSFs in Section 6.	
86	Suggestion: Fix cross-reference.		
87	Suggestion: Change to: "A one-line drawing of the flood mitigation system and the electrical system during the flood"	Revised	
88	Question: Is this paragraph redundant information?	Revised	
89	Observation: This is not a complete sentence.	Revised	
90	Request: Provide additional information about how to interpret the staffing information	Added discussion to Section 4	
91	contained in the spreadsheet. Question: Should this information be part of a preparer's note rather than in the body of the	Revised	
92	text? Suggestion: Septence peaks editing	Rewritten – See Section 4	
	Suggestion: Sentence needs editing. Clarification needed: Clarify that this does not imply exceptions are asked for during the		
93	event or expected as part of the performance of an integrated assessment, but rather it is	Added to preparers note Consistency between the table and text will be established. The additional	
94	Observation: Some key pieces of information and details are contained in this table that are not reflected in the text of the document.	information will be added to the text or the table will be referenced in the text for additional information. The table will be revised to enhance clarity and consistency with the body of the example and the graphical timeline.	
95	Request: Note earlier comment about a table containing procedure descriptions and summaries.	Procedure summary table will be added.	
96	Suggestion: Consider replacing numbers with description of the value that should be included (e.g., [technical specification limit for uncharacterized leakage]).	OK, agree. This approach should be used consistently throughout. (in some places number are requested - see comments 70 and 73	
97	Suggestion: Clarify which flood barriers.	OK Portable Lighting provided for non-essential activities only. Battery operated and	
98	Question/clarification needed: Is this lighting powered by the flood DGs? Suggestion: Note comments provided on previous draft regarding the cold shutdown and	used as required/directed. MCR and egress path light powered from SFMS DG.	
99	use of the SGs.	See Section 3.3	
100	Suggestion: Delete "completion of"	Revised	
101	Suggestion: Delete "completion of"	Revised	
102	Observation: This sentence is confusing.	Revised	
103	Clarification needed: Clarify terminology and ensure consistency with the rest of the text.	Revised	
104	Observation: This second operations crew is not reflected in the timeline, which shows only one ops crew at 24-30 hours.	Timeline revised to remove second crew reference	
105	Question/clarification needed: How does this step relate to the actions at time 24?	This is the time when the switchyard is flooded. The timeline has been revised to	
106	Clarification needed: Provide additional discussion of this in the text.	clarify and key flood levels can be seen in Section 5 Timeline clarified, discussion will be added	
107	Suggestion: Include this information in preparer's note.	Discussion added to section 4 regarding 10 CFR 26.205 Example Updated to reflect request	
107	Suggestion: Include a failure branch for all top events. If the failure branch goes directly to	A success path diagram has been included to show more detail and replace the	
108	an adverse ES, provide justification for it being a low probability ES. See additional comment associated with text under Table 5.	event tree. This shows the critical path of event for success. All the actions are highly reliable and have margin.	
109	Suggestion: Add a column to document potential failure modes associated with each top	The reliability of each top event has been evaluated in accordance with APP A	
110	event. Observation: The action is time sensitive because, if the action does not occur, 24 hours	and C and documented in Sections 9 and 10. Timeline and actions have been clarified. All actions are time sensitive and the	
111	are not available for site response. Question/clarification needed: Shouldn't alignment of SG flowpath be included as a	margin has been shown It has been added to the success path in figure 5-1.	
	success criterion below? Question: Why was the failure branch not developed? What if the two normally closed and	A success path has been shown in figure 5-1. See response to 108 above.	
112	locked manual valves in the AFW line can't be opened? Suggestion: Short Term AC Power Available should be revised to: "Flood" DGs start and	We demonstrate this is a highly reliable action with margin in Section 8.	
113	Text states that replacement DGs are available after 3 days. Licensee should confirm that the failure likelihood to start and run at least 3 days is justified to be low.	See response to 108.	
114	Observation: A failure branch is included for this top event (though it says here that one is not included).	See response to 108.	
115	not included). Suggestion: Well pumps functional should be revised to: Well Pumps start and run for the duration of the flooding event (13.5 days). Evaluation should confirm that the failure likelihood to start and run for 13.5 days is instified to be low.	See response to 108.	
116	Suggestion: Provide information about each low probability ES and justification for the conclusion that is it low probability. Request: Tabulate this information. For example:	Added in new table for the success path.	
	Endstate Descripti	on of Justification for probability	10
	Suggestion: This item (DGs to function) should be revised to: DGs start and run for the duration of the flooding event (13.5 days).	•	
117	The text states that replacement DGs are available after 3 days. Evaluation should confirm that the failure likelihood to start and run at least 3 days is justified to be low.	See response to 108.	
	Suggestion: This item (well pumps to provide water) should be revised to: the Well pumps		
118	failing to start and run for the duration of the flooding event (13.5 days). The evaluation should confirm that the failure likelihood to start and run for 13.5 days is justified to be low.	See response to 108.	
118	failing to start and run for the duration of the flooding event (13.5 days). The evaluation should confirm that the failure likelihood to start and run for 13.5 days is justified to be low. Suggestion: Include down branches for all top events and document low probability end	See response to 108. See response to 108.	
	failing to start and run for the duration of the flooding event (13.5 days). The evaluation should confirm that the failure likelihood to start and run for 13.5 days is justified to be low.	·	

123	gauge?	Added to section 3.
124	Suggestion: Change to "dipstick."	This is no longer applicable. Component described further.
	Suggestion: Specify location and elevation of valves.	Will be indicated on plant drawings
125	Suggestion: Provide bases for the statements made in this paragraph.	Revised
126	Suggestion: Provide reference to appropriate section providing evaluation of this action.	Will be covered in the HRA section
127	Question: Will this include the operational requirements described in Section A.1.2.1 of the integrated assessment ISG? Also, note earlier comment suggesting inclusion of procedures and summaries.	See Section 7
128	Suggestion: The two normally closed and locked manual valves in AFW Tee Branch need to be listed in Table 6 All active SSCs (those that must change state) for the flood mitigation path to work must be included.	Updated the table
129	Question/clarification needed: Does this mean this table is not shown in this example (e.g., for brevity) but would need to be shown in an actual submittal? If so, consider including footnotes or a preparer's note.	Not show for brevity. We will state that the actual IA needs to contain this information
130	Question/clarification: Confirm that this is indicating that instrument air is already installed in the plant, so no additional equipment is needed (so long as there's ac power for the compressor). If power is not available, demonstrate that it can be powered by bottles of compressed air or a local accumulator.	IA is part of the normal plant equipment. No additional equipment is needed.
131	Question: Why?	Details provided in Section 4 preparer's notes
132	Question: Why?	Details provided in Section 4 preparer's notes
133	Question: Why? Suggestion: Make sure to include all the considerations in Section A.1.2.1 (including	Details provided in Section 4 preparer's notes
134	operational data, performance criteria (Table A1), operational requirements, incorporation in plant programs, and reliability information).	Added into Section 6 preparer's note
135	Suggestion: The reliability evaluation should include ALL SSCs that must change state for the Flood Mitigation Path to function. For example, the two normally closed and locked manual AFW valves are not included in this Table. In addition, the failure likelihood of the ADVs and MSSVs should be included.	See response above.
136	Suggestion: IEEE-500 is an old data source. The numbers are obtained from expert judgment. Consider adding a preparer's not that the use should validate the applicability of older data or should use more current data sources based on operational experience.	Preparer's Note Added: Standards and references used and to demonstrate reliability are the latest revisions, if possible and available.
137	Observation: The basis provided in the third column addresses both failure to start and recovery.	Reference to recovery has been removed. The equipment is shown to be highly reliable with margin.
138	Question/clarification needed: How is the reduced value justified compared to other SSCs credited plant programs such as the maintenance rule? Observation: Failure data typically does not credit repairs (as done below).	Discussion has been added to the table and data source has been identified.
139	Suggestion: It is not appropriate to build the recovery into the equipment failure rate. Moreover, if equipment recovery is required to ensure sufficient reliability of the strategy, manual actions associated with recovery should be evaluated as part of the evaluation described in Section 10. Suggestion: Showing down branches and providing the additional documentation suggested in Section 5 (i.e., document failure modes in Table 5) will make it clear that the failure of the submersible pump is a failure mode for the top event associated with "equipment alignment" in the event tree and the action associated with repair/replacing the pump is the recovery.	This has been deleted and removed from the example
140	Suggestion: The evaluation should document that multiple spare connectors and cables that	Added to Section 3
	are available and accessible during the flood.	
141	Question: Are there any support systems associated with cooling (once running) or starting	No, the diesel is self-contained in this example. Will add a preparer's note stating that the support systems would need to be discussed if these systems were
	the DGs?	stating that the support systems would need to be discussed if these systems were needed.
141 142 143	the DGs? Suggestion: The core exit thermocouples should be included in this list. Request: Note feedback provided in previous NRC comment document, which has not yet been addressed in this version of the document. Particular comments of relevance include comments associated with level of detail and integration of this section with the remainder of the document. Suggestion: Provide additional justification for assumed numerical values (or provide	stating that the support systems would need to be discussed if these systems were
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	Suggestion: Describe these kinds of words operationally (i.e., describe how it is determined	
	that procedures are "well-defined"). Operating experience or the CAP can help. For	
	example: "Procedure AOP-XXX has been used for shutting down the reactor since start-up	
	in June of 1982. In that time, fifty-five revisions were made, but only two revisions affected	
161	steps X through Y. During that same time there were twenty-eight corrective action items of which two involved operator errors, neither of which were caused by poor wording or	See 156
	logic in the procedure. There have been no corrective action items written against this	
	procedure in the last five years. A survey of 12 currently licensed operators confirmed that	
	the procedure was easy to read and understand."	
	In addition, the information on the frequency of use (in both the MCR and simulator) may	
	provide useful information.	
162	Suggestion: A reference should be made here to the timing analysis, and state that the time required for shutdown averages about XX minutes and the time available is X hours,	See 156
102	providing a margin of Y hours and YY minutes.	560 150
163	Page break added so all comments would print cleanly when the PDF is generated.	See 156
164	Suggestion: The comments provided in the previous section (10.1.2.1 Operators Fail to	See 156
	Shutdown Reactor) apply here as well. Suggestion: According to the title of this section, these subsection headings should	
165	reference actions not failures.	See 156
	Suggestion: The way these sentences are structured it appears that it is being asserted that	
166	the action is reliable and additionally there are clear cues, etc. The submittal should be	See 156
	clear in stating the position (the action is reliable), and the basis for the position, without blurring the distinction between the two.	
	Question/clarification needed: Is it necessary for management to request shutdown cooling?	
167	Is the cue the procedure being executed?	See 156
168	Observation: Stress is a PSF, it does not cause PSFs.	See 156
169	Suggestion: Provide supporting justification of feasibility and reliability. The format of Table 9 and supporting Tables 9-A through 9-? or equivalent may be used.	See 156
	Suggestion: To this point, command and control has not been addressed. There should be a	
170	general discussion of the command and control structure that will be used before, during,	See 156
170	and after the flood event. That discussion could go here, but may be better in one of the	Sec 130
	overview sections (2, 3, or 4).	
171	Suggestion: Show the margin between time available and time required for this sequence,	Detailed time margin calculations have been added to section 7.0
171	e.g., 59 minutes required, 24 hours available, margin of just over 23 hours.	and margin carculations have been added to section 7.0
	Suggestion: Since both DGs use the same fuel tank, it's conceivable that they both could	
172	fail due to a problem with the fuel. Discuss what is being done to prevent this from	Further discussion has been provided in revised document. Sections 3 & 4
	happening, and what contingency actions will be taken if both DGs fail to run. This discussion could go earlier in the document.	include discussion on the system design.
173	Suggestion: Describe what's involved in this task.	This task has been removed.
	Question/clarification needed: Shouldn't there be a step before this one, e.g., Open ADV	
174	using Instrument Air"? Isn't N2 a backup?	This section has been rewritten and the comments are no longer applicable.
	Also, a battery connection to a solenoid is mentioned in the text, but not addressed here. Or	8 11
	will N2 be attached even before they try to open ADV with IA? Question/clarification needed: Open using instrument air? Or is it assumed that instrument	
175	air has failed to open the ADV?	See 174
176	Suggestion: Entries in this column should reflect descriptions (facts) rather than	
170	conclusions.	
177	Observation: Discussing time required without addressing the time available and time margin has limited value.	Table removed and section rewritten.
	Suggestion: This column should provide the summary assessment and reference to supporting information (e.g., assessments performed according to the ISG Appendix C).	
		See 177
178	For example, the entry above provides the reference to a supporting assessment but not the	
178	For example, the entry above provides the reference to a supporting assessment but not the overall assessment, while this one omits the reference to a supporting assessment.	
1/8		
178	overall assessment, while this one omits the reference to a supporting assessment. Suggestion: Each action should have an associated assessment. Add references for any actions that don't have assessments. Otherwise, there is no basis for the designation of the	See 177
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195		I
	Question: How is the facility lit when off-site power is lost? Suggestion: This would be a good place to describe the instruments that will be used to	See 182
196	monitor the state of the reactor and how they are powered.	See 182
197	Question/clarification needed: What is the basis for this? Additional information (e.g., operator opinion) needed.	See 182
198	Question/clarification needed: Who is in the student population? Since it is specified that a crew is two engineers, are there any other qualifications in addition to the annual training? Won't they have to be active licenses? Will they be running the plant from the DG facility?	See 182
199	Observation: "NA" not appropriate due to effect of 40mph winds.	See 182
200	Question: Which table? Observation/question: Fitness also includes fitness for duty (see Section C.3.1.9). Will	See 182
201	these engineers be included in the plant's fatigue management program?	See 182
202	Question/clarification needed: How was a crew of two engineers confirmed to be adequate to perform this action? Questions: Are there any "blind spots" on site, especially in or near the DG facility, MCR,	See 182
203	and TSC? What other forms of communication will be available and operable during the event?	See 182
204	Question: Is there any chance that antennae required for communication could be damaged or disconnected by a 40 mph wind?	Wind speed has been judged to not affect the actions, as they are all completed inside.
205	Suggestion: For the sake of completeness, provide the titles of all credited actions. For example, based on the previous comments, the next action (9.C) is to "align valves and hoses in the DG fuel system to feed DGs from day tank", and 9.D is "Start and run DGs for 15 minutes." PLE would be "Realign WWP for preparation for injection into SG", and 9.F would be installing the spool piece. Keep going until the event is by definition "complete."	A table of all actions with identifiers have been added to Section 7.0
206	Suggestion: This is the preferred level of detail.	This action has been removed
207	Observation: Preparation of the DG facility was addressed in 9.B Question/observation: Will the Control Room be evacuated? If not, it isn't clear about how	See 206
208	the DG crew and the CR and TSC integrate their actions.	See 206
209	Suggestion: Here there should be a discussion about how operators get feedback on valve positions, the level and pressure of the SGs, and any other instruments, displays, and controls needed. NA should not be used. There must be at least enough displays and controls to control the reactor during the flood.	See 206
210	Observation/suggestion: Accessibility is addressed below. Delete text here.	See 206
211	Suggestion: Address under the procedures PSF.	See 206
212	Questions/clarification needed: Are any special qualifications (e.g., license) required? Explain why Training & Experience are nominal for this action. Do all personnel get the annual training? Does the annual training cover this alignment in detail? Who is in the plant population that will get the training? Is there a JPM associated with the alignment?	See 206
213	Observation: Unless all aspects of this action take place indoors, NA is not appropriate.	See 206
214	Question: Are the personnel performing these actions monitored under the fitness for duty rule?	See 206
215	Suggestion: This should be a separate assessment	See 206
216	Suggestion: These write-ups should summarize the most influential PSFs for each action and describe why they won't be an issue. For example, the first three actions have mostly to do with communication, so that should be the focus of discussion for those PSFs, not environmental factors. Comments provided below are consistent with this suggestion.	This table has been removed and included in each individual action. Appropriate details have been provided.
217	Observation: Environmental Factors are just one PSF of many that affect the actions.	See 216
218	Clarification needed: It is not clear what "disposition" means when all PSFs are nominal. Degraded PSFs would need dispositions to demonstrate that the site was doing something to fix it, or putting barriers in place to mitigate failures. It is not clear what the intent of this table, except to show that all PSFs associated with the credited actions are nominal or above.	See 216
219	Clarification needed: There is something missing from the first half of this sentence, and the second part needs justification. What is it about the action that makes it "well proceduralized?" For example, were the dam procedures reviewed by a procedure writer? Or, has the action has been tested during drills without error? Is there something else that	See 216
	confirms the statement that the action is well proceduralized?	
220	confirms the statement that the action is well proceduralized? Suggestion: Consistent with the suggestion provided in the comment associated with the caption of the table: Focus more on staffing, command & control for this PSF.	See 216
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221 222 223 224 225 226 227 228 229 230 231	Suggestion: Consistent with the suggestion provided in the comment associated with the caption of the table: Focus more on staffing, command & control for this PSF. Suggestion: Consistent with the suggestion provided in comment associated with the caption of the table: Focus on system interface issues, such as turn-wheels, switches, and training and experience issues, like trouble-shooting. Also consider Dises! generator experience. And whether procedures and equipment are accessible. Suggestion/question: Consistent with the suggestion provided in the comment associated with the caption of the table: Focus on experience and training in pump testing, etc. Are "how to" guidance and criteria for success proceduralized? Suggestion: Consistent with the suggestion provided in the comment associated with the caption of this table: Focus on procedures, training, operations experience. Suggestion: Consistent with the suggestion provided in comment associated with the caption of this table: Focus on operations experience, training, qualifications, minimal or error-free history (if true), procedures Suggestion: Consistent with the suggestion provided in comment associated with the caption of the table: Focus on operations experience, training, qualifications, minimal or error-free history (if true), procedures Suggestion: Consistent with the suggestion provided in comment associated with the caption of the table: Focus on fitness, training, and experience. Suggestion: Consistent with the suggestion provided in comment associated with the caption of the table: Focus on procedures, training, experience. Suggestion: Consistent with the suggestion provided in comment associated with the caption of the table: Focus on procedures, training, experience. Suggestion: Consistent with the suggestion provided in comment associated with the caption of the table: Focus on procedures, training, experience. Suggestion: Consistent with the suggestion provided in comment associated with the caption of the table: Focus on procedure	See 216