

DRAFT
REQUEST FOR ADDITIONAL INFORMATION
OFFICE OF NUCLEAR REACTOR REGULATION
REQUEST FOR ADDITIONAL INFORMATION RELATED TO AN AMENDMENT TO ADOPT
TECHNICAL SPECIFICATIONS TASK FORCE TRAVELER TSTF-425
TO RELOCATE SPECIFIC SURVEILLANCE FREQUENCIES TO A
LICENSEE CONTROLLED PROGRAM
BEAVER VALLEY POWER STATION – UNITS 1 AND 2
DOCKET NO. 50-344 AND 50-412

By letter dated October 18, 2013,¹ FirstEnergy Nuclear Operating Company (the licensee) submitted a license amendment request (LAR) for Beaver Valley Power Station, Units 1 and 2 (BVPS). The proposed amendment would modify the BVPS technical specifications by relocating specific surveillance frequencies to a licensee-controlled program with the implementation of Nuclear Energy Institute (NEI) 04-10, Revision 1, “Risk-Informed Technical Specifications Initiative 5b, Risk-Informed Method for Control of Surveillance Frequencies.”² To complete its review, the Nuclear Regulatory Commission (NRC) staff requests a response to the questions below.

- RAI 1: The finding pertaining to IF-D5-01, located in Table 2 of Enclosure B of the LAR, observes that the licensee uses outdated Internal Flooding Pipe and Tank Break frequencies for their Internal Flood (IF) assessment. The peer review team suggested that the licensee should update this Surveillance Requirement (SR) “to reflect more recent experience and should include plant specific experience.” The licensee addressed this by stating that the latest IF model and focused peer review supersedes this finding and that the resolution is documented. Please describe the result of this SR in the updated PRA model and focused peer review and its associated resolution.
- RAI 2: The finding pertaining to IF-D5-02, also located in Table 2 of Enclosure B of the LAR, observes that the licensee uses generic capacity factor data, which lowers the Initiating Event Frequency (IEF) and causes inconsistent IF IEFs for pipe break. The peer review team suggested that “the calculation for IF IEF be revised to be consistent with the focused Peer Review Facts and Observations (F&Os) as well as with the method used for other IEFs.” The licensee addressed this by stating that the latest IF model and focused peer review supersedes this finding and that the resolution is documented. Please describe the result of this SR in the updated PRA model and focused peer review and its associated resolution.

¹ Agencywide Documents Access and Management System (ADAMS) Accession No. ML13295A006.

² ADAMS Accession No. ML071360456.

- RAI 3: Please describe, in more detail, how fire and seismic events will be assessed in terms of NEI 04-10 guidance. The licensee discusses the use of a Seismic and Fire PRA in Section 3.0, "External Events Considerations," of Enclosure C of the LAR, and states that it has not been peer reviewed. However, the licensee indicated that they plan to use these models to quantify Surveillance Test Interval changes. NEI 04-10 states, in part, that "Plants implementing TSTF-425 shall evaluate their PRAs in accordance with [Regulatory Guide (RG) 1.200, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities," Revision 1³]." The statements made in the submittal indicated that the fire and seismic portions of the BVPS PRA have not been assessed against the PRA Standard referenced in RG 1.200, Revision 2.⁴ For fire and seismic external events, please explain whether a qualitative or bounding (step 10), or detailed risk analyses (step 11) described in the NEI 04-10 guidance will be used (PRA model for step 11 should meet technical adequacy of RG 1.200 Revision 2).
- RAI 4: In the F&O related to SY-B1, located in Table 2 of Enclosure C of the LAR, the licensee resolved the peer review teams' unmet finding by using a different source of information than what was prescribed in the American Society of Mechanical Engineers (ASME) RA-Sb-2005, "Standard for Probabilistic Risk Assessment for Nuclear Power Plant Applications," PRA standard (ASME PRA Standard). The licensee further states that Westinghouse Commercial Atomic Power (WCAP)-16672-P was used because it "addressed the concerns that were raised regarding the consistency and correctness of the CCF [common-cause failure] events included in the NRC CCF database." Please provide the points of deviation between the WCAP and NUREG/CR-5497 and their potential impact on the risk result.
- RAI 5: The submittal highlights the licensee's PRA model changes and peer reviews against the ASME PRA standard. The ASME PRA Standard and RG 1.200 Revision 2 clarify the definition of a model update versus an upgrade. Please provide clarification on the model changes as to whether they were updates or upgrades.
- RAI 6: The licensee discusses all of the PRA model changes and a subsequent peer reviews in the submittal but does not provide any information regarding the resolution of the F&Os that were considered to be documentation. Please provide those applicable F&Os and their resolution.

³ ADAMS Accession No. ML070240001.

⁴ ADAMS Accession No. ML090410014.