Implementation Issues

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Purpose

- Review Time Line of Activities
- Discuss Issues in light of Schedule Considerations

Getting to the Finish Line

- From the Industry Perspective
  - Compliance means Technical Specification requirements are fully consistent with 50.46c
  - Involves licensing topical reports (LTRs)
  - Involves license amendment requests (LARs)
  - Core Operating Limits Report (COLR) Updates

Methods For LOCA

- Methods Needing Safety Evaluation
  - Hydrogen Uptake Model
  - Crud & Pre-oxidation
  - Cathcart-Pawel Correlation
  - 2-Sided Oxidation
  - ECR Acceptance Curve
  - Deterministic Debris Model
  - Breakaway Oxidation Program
  - Long Term Cooling Method(s)
  - Determine Minimum ECR Margin
  - How Do I Determine Minimum ECR Margin?
    - ECR Curves that are not 2200°F

Methods

- Qualitatively, what actually needs to be in Technical Specifications?

Example 1

- Low “Analytical Effort” Track 1
  - Hydrogen Model
  - Keep existing system model
  - Simple conversion to C-P based ECR

Example 2

- Higher "Analytical Effort" Track 3
  - Hydrogen pickup model; tied to new cladding
  - New cladding material; ECR limit / extra testing
  - New evaluation model
  - Full break spectrum

Proposal

- Keep Information in the Rule Simple
  - Single due date for licensees to submit plan
    - ~120 days post FRN
  - Plans can be based on templates, facilitating resource prioritization issues
  - NRC, Licensees, Vendors to work out a living compliance plan going forward
    - ~12 months post FRN
    - Allows all parties to have practical guide assisting with individual resource allocations and scheduling.