

NRR-PMDAPEm Resource

From: Singal, Balwant
Sent: Wednesday, November 05, 2014 8:28 AM
To: Lsterling@stpegs.com
Cc: 'rigonzales@stpeg.com'
Subject: Request for Additional Information (RAI) - License Amendment Request (LAR) for Revision to Technical Specification (TS) 3.3.1 (TACs MF3319 and MF3320)
Attachments: MF3319-RAI.docx

Lance,

By letter dated January 6, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14035A075), as supplemented by letter dated June 9, 2014 (ADAMS Accession No. ML14184B363), STP Nuclear Operating Company (STPNOC) requested for a revision to TS 3.3.1, "Reactor Trip System Instrumentation," with respect to the required actions and allowed outage times for inoperable reactor trip breakers. The U.S. Nuclear Regulatory Commission needs additional information described in the Attachment to complete its review.

The Draft RAIs were transmitted on October 23, 2014 and the NRC staff was informed on November 4, 2014 that a clarification call is not needed. Please provide your response within 30 days from the date of this e-mail and treat this e-mail as formal transmittal of RAIs.

Thanks.

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REQUEST FOR ADDITIONAL INFORMATION
AMENDMENT TO REVISE TECHNICAL SPECIFICATIONS 3.3.1
FUNCTIONAL UNIT 20, "REACTOR TRIP BREAKERS"
SOUTH TEXAS PROJECT, UNITS 1 AND 2
DOCKET NOS. 50-498 AND 50-499

1. Westinghouse Topical Report WCAP-15376-P-A, Revision 1, "Risk-Informed Assessment of the RTS [Reactor Trip System] and ESFAS [Engineered Safety Features Actuation System] Surveillance Test Intervals and Reactor Trip Breaker Test and Completion Times," (Agencywide Access and Management System (ADAMS) Accession No. ML030870542) analysis did not report uncertainty bounds for the proprietary data estimates, which may have an influence on plant-specific results. Please explain how the licensee considered the uncertainty in the data consistent with the guidance in Regulatory Guide (RG) 1.174, Revision 2, "An Approach for Using Probabilistic Risk-Assessment in Risk-Informed Decisions on Plant Specific Changes to the Licensing Basis," (ADAMS Accession No. ML100910006) and RG 1.177, Revision 1, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications," (ADAMS Accession No. ML100910008) to ensure that the conclusions of WCAP-15376 remain valid for the plant-specific case.
2. The licensee stated that "the quality of the South Texas project (STP) Probabilistic Risk Assessment (PRA) was reviewed by the Nuclear Regulatory Commission (NRC) as part of the process for approving Risk Managed Technical Specifications (RMTS) at the South Texas Project." The licensee stated that NRC staff reviewed Revision 5 of their PRA model as part of the RMTS application (Final Safety Evaluation for RMTS program ADAMS Accession Number: ML071780186). However, this application is supported by Revision 7.2 of the STP PRA model.
 - a) Please explain whether any updates, upgrades, and peer reviews, as defined by ASME [American Society of Mechanical Engineers]/ANS [American Nuclear Society] RA-Sa-2009, "Standard for Level 1/Large Early Release Frequency Probabilistic Risk Assessment for Nuclear Power Plant Applications," have been performed since the licensee's RMTS submittal.
 - b) Please provide the Facts and Observations (F&Os) and their dispositions from recent or previous peer reviews that are applicable to the proposed Technical Specification revision in this License Amendment Request (LAR).

- c) Please explain how the risk from external events is considered for this LAR.
3. RGs 1.174 and 1.177 establish the need for an implementation and monitoring program to ensure that extensions to Technical Specification Completion Times or bypass test times do not degrade operational safety over time and that no adverse effects occur from unanticipated degradation or common-cause mechanisms. Please explain how the licensee monitors the reliability and availability of the RTS instrumentation.