

FAQ Number 15-0075 **FAQ Revision** 0
FAQ Title Treatment of Changes to Attachment S Modifications During Transition

Plant: Various Date: May 15, 2015
Contact: Victoria Anderson Phone: (202) 247-1669
Email: vka@nei.org

Distribution: *(NEI Internal Use)*

805 TF FPWG RATF RIRWG BWROG PWROG

Purpose of FAQ:

To propose a new transition license condition, which would allow a licensee to make changes to the committed modifications described in Attachment S of the NFPA 805 LAR.

Is this Interpretation of guidance? Yes / No

Proposed new guidance not in NEI 04-02? Yes / No

Details:

NEI 04-02 guidance needing interpretation (include section, paragraph, and line numbers as applicable):

The transition license condition, as currently written, calls for the licensee to implement all modifications as described in Attachment S (typically in either Table S-1 or Table S-2), regardless of new analyses that may reveal that changes to those modifications are appropriate. This FAQ outlines a proposed new transition license condition, which would allow a licensee to make changes to the modifications described in Attachment S with an advance notification to the NRC.

Circumstances requiring guidance interpretation or new guidance:

As it is anticipated that in the near term, several new Fire PRA methods and data will be available for use in regulatory applications, many licensees may find that the risk profile of their plant is adjusted, which may call for changes to the committed modifications as described in Attachment S. The ability to make such changes in the transition period is critical, and adjusting the license condition is the most expedient manner of allowing for such changes.

FAQ Number	15-0075	FAQ Revision	0
FAQ Title	Treatment of Changes to Attachment S Modifications During Transition		

Detail contentious points if licensee and NRC have not reached consensus on the facts and circumstances:

None

Potentially relevant existing FAQ numbers:

None

Response Section:

Proposed resolution of FAQ and the basis for the proposal:

It is suggested that licensees be permitted to make changes to committed modifications as described in Attachment S by changing the transition license condition, such that changes are allowed provided that the NRC is notified, via letter report, no fewer than 90 days prior to achieving full compliance with 10 CFR 50.48(c). This letter report would contain the following information:

- Description of any change made to modifications identified in Attachment S
- Reason for changes to modifications identified in Attachment S
- Any change to the results from the delta risk calculations
- Verification that individual and cumulative changes meet the thresholds in Regulatory Guide 1.174, *An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis*
- Updated transition risk metrics
- Verification that safety margins and defense-in-depth are maintained
- Identification of any PRA methods or data that have been changed since issuance of the safety evaluation

Should the NRC staff determine that further review is required, an accounting code to support the reviews will be identified and/or established.

If appropriate, provide proposed rewording of guidance for inclusion in the next Revision:

Modify the transition license condition items 2 and 3 to read as follows:

2. The licensee shall implement the modifications to its facility, as described in Enclosure 1, Attachment S, Table [LAR Table ID that contains committed modifications], "Plant Modifications Committed," of [Utility name] letter [letter number], dated [letter date], to complete the transition to full compliance with 10 CFR 50.48(c) by [transition date] following issuance of the license amendment unless a plant change evaluation of

FAQ Title Treatment of Changes to Attachment S Modifications During Transition

the change, as described herein, demonstrates that the acceptance criteria specified in Risk-Informed Changes that May Be Made Without Prior NRC Approval are met. Prior notification to NRC is not required for individual changes that either clearly result in a decrease in risk or result in a risk increase less than 1×10^{-7} /year (yr) for CDF and less than 1×10^{-8} /yr for LERF. The proposed change must also be consistent with the defense-in-depth philosophy and must maintain sufficient safety margins. The change may be implemented following completion of the plant change evaluation.

Any change to the scope of the modifications as described in Enclosure 1, Attachment S, Table [LAR Table ID that contains committed modifications], "Plant Modifications Committed," of [Utility] letter [letter number], dated [letter date] shall meet the individual and cumulative changes meet the thresholds in Regulatory Guide 1.174, *An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis*, and any such changes shall be identified to the NRC by letter report no less than 90 days prior to achieving full compliance with 10 CFR 50.48(c). The letter report shall identify the scope of any change and summarize the results of the plant change evaluation including risk assessments performed to substantiate the change. The licensee shall maintain appropriate compensatory measures in place until completion of these modifications.

3. The licensee shall implement the items listed in Enclosure 1, Attachment S, Table [LAR Table ID that contains implementation items], "Implementation Items," of [Utility] letter [letter number], dated [letter date] no later than [Licensee specific number] days after NRC approval unless that falls within a scheduled outage window, except for Item(s) [Implementation Item No(s). requiring confirmation of risk/delta risk metrics]. Then this will occur [Licensee specific number] days after startup from that schedule outage. Per item 2 above, any change to the scope of the modifications as described in Enclosure 1, Attachment S, Table [LAR Table ID that contains committed modifications], "Plant Modifications Committed," of [Utility] letter [letter number], dated [letter date] shall be identified to the NRC by letter report. Item(s) [Implementation Item No(s). requiring confirmation of risk/delta risk metrics] shall be implemented within 60 days of completion of final plant modifications.