# NRC Meeting
# October 8, 2015
# CCNPP NFPA 805
# License Amendment Application

# Agenda

- Current Licensing Status:
- PRA-3:
  - Using NRC template for confirmation of RAI status
  - Adding Fire Modeling RAIs to the listing
  - No questions regarding input provided by the NRC.
- RG 1.174 limit margin
  - Delta CDF
  - Delta LERF
  - Margins and delta LERF
    - Small margins
    - Significance of the limit
- Compliant Plant Definition for Cable Spreading Room

# CCNPP Team Members:

- Exelon/CCNPP Representatives
  - Jeff Stone - Exelon Senior FPRA Manager
  - Jim McQuighan - Exelon Manager, NFPA 805
  - Ron Reynolds/Pat Furio - Exelon Principal Regulatory Engineer
  - Rob Cavedo - Exelon Senior Staff FPRA Engineer
  - Pat Pringle - Exelon Senior PRA analyst
  - Paul Darby - Exelon NFPA 805 Electrical Engineer
  - Usama Farradj - FPRA consultant
  - Tom Daniels - FPRA consultant
  - Mark Graham - FPRA consultant
  - Mark Schairer - Fire modeling consultant
  - Jeff Quinn - NFPA 805 consultant

# Current Licensing Status

| | |
|---|---|
| ▪ CCNPP NFPA 805 Transition Request Submittal | 09/24/2013 |
| ▪ NRC On-Site Audit and Draft RAIs | 12/12/2014 |
| ▪ CCNPP Submittal of last follow-up RAIs responses | 08/13/2015 |
| ▪ Public Meeting to Discuss FPRA Results | 10/08/2015 |
| ▪ Submission of Final Results (Attachments C, G, S & W) | to be discussed. |
| ▪ NRC Issues Safety Evaluation | to be discussed. |

# Fire PRA Status:  PRA-03

- Necessary Fire Modeling is complete.
- Total risk quantification results are in.

- Total Delta Risk, Risk of Recovery Actions will be evaluated IAW RG 1.174 criteria.
- Final Quantification/documentation has begun.
- The final results will accompany the response to RAI PRA 3, 19a and 19d.
- Attachment C, G, S and W updates will be transmitted with the PRA RAI-3 response.
- Methodology for PRA 03 will be the same as post transition, no outstanding items with respect to Fire PRA methodology are expected at the time of issue of the final RAI 03 response.

# RG 1.174 Delta Risk Criteria.

- Discussion of Results:
  - Total CDF
  - Total LERF
  - delta CDF
  - delta LERF
  - Significance of delta LERF.
    - Discussion of margin.
    - Conservatisms in the analysis
    - Defense in depth measures/discussions.
  - Impact on NRC review
  - Impact if limited to delta LERF

# **ML15049A100**: Delta Risk for Cable Spreading Room

- Potential use of approach in the ML15049A100 (public meeting with NextEra/St. Lucie) for the Calvert Cliffs Cable Spreading Rooms
- For Control Room abandonment scenarios
  - Address VFDRs associated with Primary Control Station (Aux Shutdown Panel) only
- For non-abandonment scenarios
  - delta risk would only be applicable to operator actions credited outside the control room (including actions at Primary Control Station)
  - no train separation VFDRs (unless they result in operator actions outside the control room)