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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
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July, 13, 1998

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Mr. Louis F. Liberatori Jr., Chairman  
Westinghouse Owners Group  
Consolidated Edison Co. of NY, Inc.  
Indian Point Unit 2  
Broadway and Bleakley Avenue  
Buchanan, NY 10511

SUBJECT: REVIEW OF WESTINGHOUSE OWNERS GROUP TOPICAL REPORTS WCAP-14333P AND WCAP-14334NP, DATED MAY 1995, "PROBABILISTIC RISK ANALYSIS OF THE RPS AND ESFAS TEST TIMES AND COMPLETION TIMES" (TAC NO. M92782)

Dear Mr. Liberatori:

The NRC staff has completed its review of the subject topical reports prepared by Westinghouse Electric Corporation for the Westinghouse Owners Group. The enclosure provides the staff's safety evaluation report (SER) approving the topical reports. The topical reports describe the Westinghouse Owners Group's program, which was completed as an industry effort to demonstrate the acceptability of the increase in the test bypass times and the allowed outage times for the reactor protection system (RPS) and engineered safety feature actuation system (ESFAS). The enclosed SER was prepared by the Division of Reactor Controls and Human Factors with input from the Division of Systems Safety and Analysis and accepts topical report WCAP-14333 for referencing in plant-specific license amendment applications.

In WCAP-14333P, the WOG proposed relaxations in the technical specification required test bypass times and allowed outage times (AOTs) for the reactor protection system (RPS) and engineered safety feature actuation system (ESFAS). The staff used a three-tiered approach to evaluate risk associated with the proposed changes. The approach is consistent with the guidance in Draft Regulatory Guide DG-1065, "An Approach for Plant-Specific, Risk-Informed Decision Making: Technical Specifications." The first tier evaluates the licensee's probabilistic risk analysis (PRA) model and the impact of the change on plant operational risk. The second tier addresses the need to preclude potentially high risk configurations, should additional equipment outages occur during the AOT period. The third tier evaluates the licensee's configuration risk management program (CRMP), to ensure that equipment removed from service immediately prior to or during the proposed AOT will be appropriately assessed from a risk perspective.

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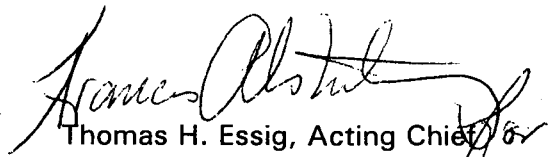
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changes in RPS and ESFAS instrumentation AOTs should result in only a very small quantitative impact on plant risk. The PRA insights generally support the proposed changes; however, the generic applicability of the PRA analysis in the topical report to all Westinghouse plants introduces a larger degree of uncertainty. Therefore, the staff expects licensees that use this topical report to justify the extended test times and AOTs by providing the following plant-specific information:

1. Confirm the applicability of the WCAP-14333P, analyses for their plant.
2. Address the Tier 2 and 3 analyses including the CRMP insights which confirm that these insights are incorporated into their decision making process before taking equipment out of service.

Should you have any questions or wish further clarification, please call the contact individual indicated below.

Sincerely,



Thomas H. Essig, Acting Chief  
Generic Issues and Environmental Project Branch  
Division of Reactor Program Management  
Office of Nuclear Reactor Regulation

Enclosure: As stated

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