

**From:** Brian Mann <Brian.Mann@excelservices.com>  
**Sent:** Thursday, February 11, 2016 3:00 PM  
**To:** Honcharik, Michelle  
**Cc:** TSTF  
**Subject:** [External\_Sender] Industry response to NRC comments on TSTF draft letter regarding TSTF-425, "Relocate Surveillance Frequencies to Licensee Control - RITSTF Initiative 5b"

Michelle,

We asked industry PRA experts to review the comments provided in your e-mail dated January 8.

Their only comments were on "Proposed Resolution, New Item (3rd Numbering)". The staff proposed adding:

Licensees should submit PRA quality information for their internal events PRA against RG 1.200, Revision 2, submit all peer review F&Os associated with the Internal Events PRA, and address the impact of those F&Os on the application.

The discussion stated:

Clarification Needed. Some licensees only consider an F&O to be open or closed with respect to whether they consider the F&O to be resolved in their model. The NRC currently considers an F&O to be closed if a subsequent peer review of the SR and the F&O considers it to be resolved in the model. (Therefore, the licensee would no longer have to submit the F&O and disposition as part of the application.) All open F&Os for Internal Events should be provided. F&Os associated with those external events that are evaluated quantitatively should also be provided.

Industry comments:

- The proposed addition should state open F&Os, consistent with the discussion.
- The proposed addition should be clarified to state that only "Finding" level F&Os need be submitted. "Suggestion" level F&Os should not be submitted.
- The proposed addition should be clarified to not require submittal of self-assessment findings for plants that had Internal events peer reviews under RG 1.200 Rev 1.

Therefore, we would propose to add:

Licensees should submit PRA quality information for their internal events PRA against RG 1.200, Revision 2, submit all *Finding-level* peer review F&Os

associated with the Internal Events PRA that *have not been closed by a subsequent peer review*, and address the impact of those F&Os on the application. *Internal self-assessment findings need not be submitted.*

We look forward to discussing this on the 18th.

Brian

**Brian D. Mann**

Vice President of Industry Programs

EXCEL Services Corporation

Direct (240) 880-0490

Main (301) 984-4400

Mobile (804) 339-7034

E-mail: [brian.mann@excelservices.com](mailto:brian.mann@excelservices.com)

Web: [www.excelservices.com](http://www.excelservices.com)

Web: [www.nukapedia.com](http://www.nukapedia.com)

Linked  profile