

Enclosure 2

Reactor Oversight Process Task Force FAQ Log –
February 18, 2015

Dated March 2, 2016

FAQ Log February 18, 2016 ROP Meeting

FAQ No.	PI	Topic	Status	Plant/Co.	Point of Contact
16-01	MS	Cook PRA Error Affecting MSPI	Discussed on January 14 and February 18	Generic	M. Scarpello (AEP) Tom Taylor (NRC)

For more information, contact: James Slider, (202) 739-8015, jes@nei.org

**NEI 99-02 FAQ 16-01 (Proposed)
Cook PRA Error Affecting MSPI**

Plant: D. C. Cook
Date of Event: 03/06/2014
Submittal Date: 12/23/2015
Licensee Contact: M. Scarpello **Tel/email:** mkscarpello@aep.com
NRC Contact: Tom Taylor **Tel/email:** thomas.taylor@nrc.gov

Performance Indicator:

1. Mitigating System Performance Index (Emergency AC Power Systems) (MS06)
2. Mitigating System Performance Index (High Pressure Injection Systems) (MS07)
3. Mitigating System Performance Index (Heat Removal Systems) (MS08)
4. Mitigating System Performance Index (Residual Heat Removal Systems) (MS09)
5. Mitigating System Performance Index (Cooling Water Systems) (MS10)

Site-Specific FAQ (Appendix D)? No [This is generic]

FAQ requested to become effective: When approved

Question Section

NEI 99-02, Rev. 7 Guidance needing interpretation (include page and line citation):

Page number and line citations are from the copy of NEI 99-02, Revision 7 posted on the ROP Program Document page of the NRC website.

- Section 1 Introduction, page 3 lines 20-22, “Guidance for Correcting Previously Submitted Performance Indicator Data”
- Section 2.2 Mitigating Systems Cornerstone, page 36 lines 7-13, “Plant-specific PRA”
- Section 2.2 Mitigating Systems Cornerstone, page 37 lines 5-13, “PRA Model Revisions”
- Appendix G, Section G2. PRA Requirements, pages G4-G5

Event or circumstances requiring guidance interpretation:

In March 2014, an error was discovered in the DC Cook PRA model related to test and maintenance values. The error was introduced into the model in 2008 and had a non-conservative impact on the MSPI coefficients. Upon discovery, the error was entered into the corrective action process to track resolution during the next PRA model update. No additional notification/briefing on the PRA error was provided to the Resident Inspectors and no comments were included in the INPO Consolidated Data Entry (CDE) software with the quarterly MSPI submittal at the time of discovery. The updated PRA model of record was approved in June 2015 and the MSPI basis document and coefficients were revised to support MSPI submittal for the third quarter 2015. Previously submitted indicator values were not revised.

DC Cook’s understanding is that the MSPI guidance contained in NEI 99-02 requires the indicators be reported based on the approved PRA model of record that was in effect at the beginning of the reporting quarter and PRA parameters are not to be changed until the quarter following approval of a revision to the PRA model of record. The “Clarifying Notes” for PRA Model Revisions under Mitigating System Performance Index description beginning on page 36 provide the basis for this interpretation. DC Cook also understands that the “Guidance for Correcting Previously Submitted Performance Indicator Data” on page 3 does not require previously submitted data to be reconsidered based on corrections/changes to the PRA model. This section provides the process for amending indicator data for data errors and newly identified faulted conditions through the “change report” feature of CDE and states “(PRA) model changes are the exception to this guidance” with a reference to the “Clarifying Notes” on pages 36-39.

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Previously, the guidance in the “Clarifying Notes” for PRA Model Revisions contained a definition of PRA model change that stated “Any PRA model changes will take effect the following quarter (model changes include error, corrections, updates, etc.)” This statement was removed based on FAQ 477, but the FAQ question and response do not appear to change the intended definition of a PRA model change as it relates to errors.

The Resident Inspectors have indicated that they may not agree with the interpretation that the “Guidance for Correcting Previously Submitted Performance Indicator Data” provides exception from correcting previously submitted indicator values for PRA model errors since the section uses the term PRA model changes and not PRA model errors. They have also questioned how the guidance for Plant-specific PRA on page 36 lines 7 through 13 applies to PRA Model errors. This guidance states:

*7 Specific requirements appropriate for this PRA application are defined in Appendix G. Any
8 questions related to the interpretation of these requirements, the use of alternate methods to meet
9 the requirements or the conformance of a plant-specific PRA to these requirements will
10 be arbitrated by an Industry/NRC expert panel. If the panel determines that a plant-
11 specific PRA does not meet the requirements of Appendix G such that the MSPI would be
12 adversely affected, an appropriate remedy will be determined by the licensee and approved by
13 the panel. The decisions of this panel will be binding.*

The Inspectors have stated it is unclear whether this guidance is used only when changes are made to the PRA model to establish technical adequacy or if it requires licensees to re-evaluate technical adequacy and make changes to MSPI coefficients when model errors are identified based on the thresholds listed for F&O impacts in Appendix G.

DC Cook documents the basis for PRA model technical adequacy to support MSPI as specified in Appendix G Section G 2 in the MSPI Basis Document. The identified PRA model error did not cause the station to question the overall technical adequacy of the PRA model to support the MSPI application. In response to a question from the Resident Inspectors, a review of the impact of the error on the previous MSPI coefficients was performed. This review indicated that some Birnbaum values would have changed by more than a factor of 3, but all MSPI values would have remained within the Green band.

If licensee and NRC resident/region do not agree on the facts and circumstances explain:

DC Cook and the NRC Resident Inspectors agree on the facts and circumstances related to this FAQ.

The Resident Inspectors would like to emphasize that the guidance in NEI 99-02 cannot supersede the requirements of federal regulations, specifically 10CFR50.9 in this case.

Potentially relevant existing FAQ numbers: FAQ 14-01 (MSPI PRA Technical Adequacy), FAQ 434 (LaSalle PRA model error)

Response Section

Proposed Resolution of FAQ

1. Re-incorporate the definition of PRA model changes to include errors, corrections, updates, etc that were removed from NEI 99-02 under FAQ 477.

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2. Clarify whether identification of a PRA model error requires the conformance of a plant-specific PRA model to be considered against the requirements of Appendix G, the threshold at which such errors would require changes be made to MSPI parameters, and when an Industry/NRC expert panel should be convened to determine if identified PRA model errors affect conformance to the requirements of Appendix G.

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

1. Return the following statement to the “Clarifying Notes” for PRA Model Revisions:
“Any PRA model changes will take effect the following quarter (model changes include error, corrections, updates, etc.)”
2. No proposed rewording is being provided for the second bullet as this requires the current guidance to be interpreted. Any necessary clarification would be left to the ROP Task Force/NRC if determined appropriate.

PRA update required to implement this FAQ? No

MSPI Basis Document update required to implement this FAQ? No

NRC Response

TBD

*Revision History
Reformatted 1/6/2016, J. Slider, NEI
Revised per ROPTF feedback 1/13/2016, AEP*