

## **NRR-PMDAPem Resource**

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**From:** Klos, John  
**Sent:** Tuesday, May 31, 2016 2:05 PM  
**To:** Williams, Lisa L.  
**Cc:** Klos, John; ONeal, Daniel  
**Subject:** 3rd round RAIs: Columbia MF6042 LAR TSTF-425, issued with 30 day response time

Ms. Williams,

By letter dated March 17, 2015, Agencywide Documents Access and Management System (ADAMS) Accession No. ML15093A178, as supplemented by letters dated September 17, 2015, ADAMS Accession No. ML15260A570, October 29, 2015, ADAMS Accession No. ML15302A492, November 17, 2015, ADAMS Accession No. ML15321A426, December 28, 2015, ADAMS Accession No. ML15363A239, April 7, 2016 ADAMS Accession No. ML16098A387, and May 11, 2016 ADAMS Accession No. ML 16132A561, Energy Northwest (the licensee) submitted a license amendment request (LAR) to adopt Technical Specification Task Force (TSTF) – 425, revision 3 to relocated specific technical specification surveillance frequencies to a licensee controlled program.

The Nuclear Regulatory Commission (NRC) staff has been reviewing the submittals and has determined that requests for additional information (RAIs) are needed to complete its technical review and make a regulatory finding regarding this LAR. The draft questions were sent via electronic transmission on May 24, 2016 to Ms. Lisa Williams and a clarification teleconference was held on May 31, 2016. Additionally, it was agreed that a response would be submitted within 30 calendar days from the date of this email, on June 30, 2016.

**THIRD REQUEST FOR ADDITIONAL INFORMATION  
RELATED TO AN AMENDMENT TO ADOPT TECHNICAL SPECIFICATIONS TASK FORCE TRAVELLER  
(TSTF)-425, REVISION 3  
TO RELOCATE SPECIFIC SURVEILLANCE FREQUENCIES TO  
A LICENSEE CONTROLLED PROGRAM  
COLUMBIA GENERATING STATION  
DOCKET NO. 50-397  
DRAFT**

By letter dated March 17, 2015, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15093A178, as supplemented by letters dated September 17, 2015, ADAMS Accession No. ML15260A570, October 29, 2015, ADAMS Accession No. ML15302A492, November 17, 2015, ADAMS Accession No. ML15321A426, December 28, 2015, ADAMS Accession No. ML15363A239, April 7, 2016 ADAMS Accession No. ML16098A387, and May 11, 2016 ADAMS Accession No. ML 16132A561, Energy Northwest (the licensee) submitted a license amendment request (LAR) to adopt Technical Specification Task Force (TSTF) – 425, revision 3 to relocated specific technical specification surveillance frequencies to a licensee controlled program.

**Regulatory Basis:**

The primary regulatory basis for evaluation of this LAR are 10 CFR 50.36 and 50.36(c)(3).

In 10 CFR 50.36, the NRC established its regulatory requirements related to the content of Technical Specifications (TS). Pursuant to 10 CFR 50.36, TS are required to include items in the following five specific categories related to station operation: (1) Safety limits, limiting safety system settings, and limiting control settings; (2) limiting conditions for operation; (3) surveillance requirements; (4) design features; and (5) administrative controls.

10 CFR 50.36(c)(3) further states that “Surveillance requirements are requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met.”

**Background:**

On March 9, 2016, ADAMS Accession No. ML16069A359 the NRC staff issued RAIs concerning the license amendment to adopt TSTF-425, revision 3. In part a of RAI no. 1.1, the NRC requested clarification “if these post-initiator Human Error Probabilities (HEPs) were assumed to be optimal stress in all cases involving this time frame or if such HEPs were determined on a case-by-case basis to represent optimal stress or high stress as appropriate.”

In Columbia’s response dated April 7, 2016, ML16098A387 the licensee stated that “the assignments of stress levels were reviewed for all Columbia Generating Station (CGS) post-initiator human failure events, and all post-initiator human failure events now utilize the stress levels recommended by the Human Reliability Analysis (HRA) Calculator. The stress level recommended by the HRA calculator was reviewed by the HRA analyst and in some cases increased to a higher stress level.” The licensee also stated that the stress levels recommended by the calculator were review by an HRA analyst, that the full intent of the Facts & Observations have been resolved, and that the stress levels assigned follows the guidance of NUREG/CR-1278, “Handbook of Human Reliability Analysis with Emphasis on Nuclear Power Plant Applications.”

In the licensee’s response there was no statement whether optimal stress was considered or if a case-by-case process for optimal stress or high stress events was applied in the time frame applied in the peer review Fact and Observation (F&O) table.

In the LAR, the licensee stated that “In almost all of the post-initiator Human Error Probabilities (HEPs) where optimal stress is assumed, time is a factor with core damage occurring between 30 minutes and an hours.” This statement is the basis for RAI 1.1 submitted above.

This RAI requests more details related to the licensee’s F&O from the peer review that will allow resolution and justification that the disposition supports the application relative to Regulatory Guide 1.200, Revision 2, “An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities,” Section 4.2, “Licensee Submittal Documentation,” ADAMS Accession No. ML090410014 which discusses the staff’s expectations of the licensee’s documentation in order to demonstrate technical adequacy of its PRA.

**Request:**

The licensee is asked to resubmit the response to RAI question PRA RAI 1.1 a) submitted to the licensee on March 9, 2017 which states;

a. The peer review F&O 1-3 states “In almost all of the post-initiator Human Error Probabilities (HEPs) where optimal stress is assumed, time is a factor with core damage occurring between 30 minutes and an hours.” Clarify if these post-initiator HEPs were assumed to be optimal stress in all cases involving this time frame or if such HEPs were determined on a case-by-case basis to represent optimal stress or high stress as appropriate. Please describe your process to make this determination.

**John Klos**

**DORL Callaway, Columbia Project Manager**

**U.S. NRC, Office of Nuclear Reactor Regulation,**

**Division of Operating Reactor Licensing, O8E7**

**NRC/NRR/DORL/LPL4-1, MS O8H4A**

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