

Record of Review
Dispositions to Point Beach Fire PRA Facts and Observations (F&Os) and Supporting Requirements (SRs) Not Met or Met at Capability Category (CC) I

Finding/ Suggestion (F&O) ID or Supporting Requirement (SR) ¹	ACCEPTABLE TO the NRC staff VIA		
	Review of Plant Disposition (A/B/C)	RAI Response	
		Not Discussed in SE	Discussed in SE
CF-A1-01	A		
CF-A1-02	A		
CF-A1-03	A		
CF-B1-01	A		See PRA RAI-01.a and PRA RAI 03 in Section 3.4.2.2
CS-C3-01		See PRA RAI 01.b. Acceptable to the NRC staff because the licensee explained that the assumed cable routing cited in the F&O is explicitly treated in the Fire PRA and that the conservatism associated with assumed spurious actuations of the turbine stop and steam dump valves is offset by Modification MOD-14 which provides a way to manually recover from the Multiple Spurious Operation (MSO).	
ES-D1-01	A		
FQ-A1-01	A		
FQ-A4-01			See PRA RAI 01.c and PRA RAI 03 in Section 3.4.2.2
FQ-A4-02	A		
FQ-B1-01	A		
FQ-E1-01	A		
FQ-F1-05		See PRA RAI 01.d and F&O disposition. Acceptable to the NRC staff because the F&O disposition provides characterization of sources of uncertainty cited in the F&O and because the response to PRA RAI 01.d further explains the impact of not modeling Instrument Air (IA). The licensee explained that IA was not credited in the post-transition plant model, except in cases where the assumption that IA failed provided a non-conservative result to the calculation of change-in-risk.	
FSS-A1-01			See PRA RAI 01.e and PRA RAI 03 in Section 3.4.2.2
FSS-B1-01	A		
FSS-B1-02			See FM RAI 1.h. in Section 3.4.2.3
FSS-C5-01			See PRA RAI 1.f and PRA RAI 03 in Section 3.4.2.2
FSS-D2-01			See FM RAI 03 and FM RAI 04 in Section 3.4.2.3
FSS-E3-01	A		

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FSS-F3-01	A		
FSS-G2-01	A		
FSS-G5-01	A		
FSS-H1-03	A		
HRA-A2-01		See PRA RAI 01.g. Acceptable to the NRC staff because the licensee explained that operator action feasibility and plant response modeling was reviewed by two licensed Senior Reactor Operators (SROs) with input from engineering. This fulfills the requirement of SR HRA-A2 (which includes reference to HR-E3 and HR-E4) to confirm procedure interpretation and plant response modeling with talk-throughs with operations.	
HRA-A3-01		See PRA RAI 01.h. Acceptable to the NRC staff because the licensee explained that assessment of spurious indications was updated subsequent to the FPRA peer reviews and because the licensee described a traceable process for disposition of all control room annunciator and instrumentation spurious actuations.	
HRA-B2-01	A		
HRA-B3-01	A		
HRA-B4 (No Finding)		See PRA RAI 01.h. Acceptable to the NRC staff because the licensee explained that assessment of spurious indications was updated subsequent to the FPRA peer reviews and because the licensee described a traceable process for disposition of all control room annunciator and instrumentation spurious actuations.	
HRA-C1-01	A		
HRA-D1-01	A		
HRA-D2-01		See PRA RAI 01.i. Acceptable to the NRC staff because the licensee clarified that the updated HRA dependency analysis "uses a minimum joint human error probability (HEP) "floor" of 1 E-5," and, therefore, no justification is required for using joint HEP values below this minimum value.	
IGN-A10-01			See PRA RAI 01.c and PRA RAI 03 in Section 3.4.2.2
IGN-B3-01	A		
PP-B5-01	A		
PP-B7-01	A		
PP-C2-01	A		
PP-C4-01	C		
PRM-A3-01	A		

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	Review of Plant Disposition (A/B/C)	RAI Response	
		Not Discussed in SE	Discussed in SE
PRM-B2-01	A		
PRM-B4-01	A		
PRM-B9-01	A		
UNC-A1-01			See PRA RAI 01.c and PRA RAI in Section 3.4.2.2
MU-F1-01	A		
LE-F1 (No Finding)	A		

A: For F&Os, the NRC the finds that the disposition of the F&O as described by the licensee in the LAR provides confidence that the issues raised by the F&O have been addressed and, if needed, the PRA has been modified, and therefore the resolution of the F&O is acceptable for this application. For Not Met or met at CC-I SRs, the NRC staff finds that the acceptability basis for the capability category of the SR as described by the licensee in the LAR provides confidence that the requirements of the SR have been addressed and, if needed, the PRA has been modified, and therefore the PRA quality with respect to the SR is acceptable for this application. Examples of acceptable Not Met and CC-I SRs are modeling methods that yield conservative FRE and change evaluation results.

B: For F&Os, the NRC staff finds that the disposition of the F&O as described by the licensee in the LAR and further clarified during the audit provides confidence that the issues raised by the F&O have been addressed and, if needed, the PRA has been modified, and therefore the resolution of the F&O is acceptable for this application. For Not Met or met at CC-I SRs, the NRC staff finds that the acceptability basis for the capability category of the SR as described by the licensee in the LAR and further clarified during the audit provides confidence that requirements of the SR have been addressed and, if needed, the PRA has been modified, and therefore the PRA quality with respect to the SR is acceptable for this application. Examples of acceptable Not Met and CC-I SRs are modeling methods that yield conservative FRE and change evaluation results.

C: For F&Os, the NRC staff finds that the resolution of the F&O, as described by the licensee in the LAR, would have a negligible effect on the evaluations relied upon to support fire risk evaluations and has no impact on the conclusions of the risk assessment and therefore the resolution of the F&O is acceptable for this application. Examples of such F&Os may be suggestions, as well as those F&Os that don't affect the fire PRA. Documentation issues may fall into this category as well. For Not Met or met at CC-I SRs, the NRC staff finds that the acceptability basis for the capability category of the SR, as described by the licensee in the LAR, would have a negligible effect on the evaluations relied upon to support fire risk evaluations and has no impact on the conclusions of the risk assessment and therefore the PRA quality with respect to the SR is acceptable for this application. Examples are those SRs that don't affect the fire PRA.

¹ The licensee provided a separate table of SRs meeting only Capability Category I, however all but two of these entries were already addressed as part of an F&O listed in Table V-1 of the LAR, and are therefore included here in this table. The two SRs not already included in Table V-1 of the LAR as part of an F&O have been added to this table.

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