

Enclosure 3  
NRC APLA Staff Comments on Industry Proposed  
10 CFR 50.69 Template for License Amendment  
Request Applications  
Meeting Summary of the 8/18/2016  
Public Meeting

**DATED September 12, 2016**

# **NRC APLA Staff Comments on Industry Proposed 10 CFR 50.69 Template for License Amendment Request Applications**

**Public Meeting  
August 18, 2016**



# Clarification – other applications

- **Industry draft template states:**

*“If applicable, include one of the two following paragraphs if it is possible to streamline the review of the PRA model in this application using the approval a previous risk-informed application such as TSTF-505 or TSTF 425 or streamline the review of the PRA model for a future submittal that will be utilizing the same models.”*

- **Clarification needed**

- List all previous risk-informed applications to expedite staff access to prior reviews
- All F&Os still need to be submitted, but staff review will incorporate previous review results

# Additional Items To Be Included in the LAR

- The LAR should address deviations, if any, from the guidance in NEI 00-04 as endorsed by RG 1.201, issued for Trial Use
- NRC approved deviations/clarifications for Vogtle pilot application:
  - License condition to add clarity to the term “sole means” in the deterministic questions from Section 9.2 of NEI 00-04
  - Order of execution of steps in the categorization process
  - Mapping of passive components to active and passive functions

# Additional Items To Be Included in the LAR

- The LAR should address plant specific aspects for the categorization process as required by NEI 00-04:
  - “Any applicable sensitivity studies identified in the characterization of PRA adequacy”, as required by Section 5 and Section 3.3.1 of NEI 00-04
  - Unreliability factor value (Section 8 of NEI 00-04)
  - PRA truncation value selected and rationale
  - Plant-specific implementation and procedures
  - Completed example categorization for one system?

# PRA Technical Adequacy Clarifications



- PRA models should be assessed against RG 1.200, Revision 2
- Licensees should submit all peer review F&Os that have not been closed by a subsequent full-scope or focused-scope peer review, and address the impact of those F&Os on the application.
- If the peer reviews for internal events PRA were performed against RG 1.200 Rev. 1, the licensee should also submit all the F&OS from the self-assessment performed against RG 1.200 Revision 2.

# PRA Technical Adequacy Clarifications



- The LAR should justify how the PRA Model of Record reflects the current as-built, as operated plant.
- The LAR should demonstrate that there were no PRA upgrades that were not peer-reviewed.

# Non PRA Methods Clarification

- The LAR should provide information on how the non-PRA methods (such as IPEEE Seismic Safe Shutdown Equipment list, IPEEE hazard screening, shutdown risk) have been reviewed to ensure that they reflect the current plant design and operation practices.
- All other hazards (external flood, high winds, transportation, industrial facilities, etc.) should be addressed by the licensees in their LAR.