

Eliminate Required Actions Not Modeled in the PRA

The NRC proposed eliminating from inclusion of license amendment requests to adopt TSTF-505 several Required Actions that are not typically modeled in a plant's PRA.

The industry does not support removing TS actions on the basis that the functions are not typically modeled in the PRA. This would be a fundamental change to TSTF-505, as the traveler was designed (with NRC agreement) to include all changes that were not explicitly prohibited because it is impossible to predict what functions may be modeled in the future. The elimination of some Required Actions due to lack of modeling should be a plant-specific decision, rather than generic issue, and the industry suggests that these TS actions be retained, with individual licensees addressing how a given function is modeled in their PRAs for the purposes of calculating an RICT.

Enclosure 1 of the model application currently states, "When requesting adoption of this Traveler, the licensee must list each specification and Required Action to which the Risk Informed Completion Time Program will be applied and, for each Required Action, describe the corresponding function modeled in the PRA." This requires applicants to address modeling of the function related to each TS action included in their application, including description of any bounding approaches to be used. Expanding the guidance in Enclosure 1 to provide additional direction to licensees is the subject to several issues under discussion. We recommend that providing additional clarity to address this issue is more productive than eliminating the Required Actions.