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Southern Nuclear Operating Company Comments on Draft
Regulatory Guide (DG) DG-1285, An Approach for Using Probabilistic Risk
Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis

Ms. Bladey:

In response to Federal Register Notice NRC-2012-0110 released on April 7, 2017, Southern Nuclear Operating Company (SNC) is providing comments on Draft Regulatory Guide (DG) DG-1285, An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis (Agencywide Documents Access and Management System Accession No. ML16358A153). SNC concurs with the Nuclear Energy Institute (NEI) industry comments provided in a separate submittal. In addition to the NEI industry comments, SNC provides further comments in the enclosure to this letter.

This letter contains no NRC commitments. If you have any questions, please contact Ken McElroy at 205.992.7369.

Respectfully submitted,

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JTW/pdb/lac

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Template = ADM - 013
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Add= A. Gilbertson (Anders Flitberston)

A. Karagiannis (hxx)

Enclosure: SNC Comments on Draft Regulatory Guide DG-1285

cc: Regional Administrator, Region II
NRR Project Manager – Farley, Hatch, Vogtle 1 & 2
Senior Resident Inspector – Farley, Hatch, Vogtle 1 & 2
NRR Project Manager – Farley, Hatch, Vogtle 1 & 2
RType: Farley=CFA04.054
Hatch=CHA02.004, Vogtle=CVC7000

**Southern Nuclear Operating Company Comments on Draft Regulatory
Guide (DG) DG-1285, An Approach for Using Probabilistic Risk
Assessment in Risk-Informed Decisions on
Plant-Specific Changes to the Licensing Basis**

Enclosure

SNC Comments on Draft Regulatory Guide DG-1285

#	Section	Comment	Proposed Resolution
1	2.1.1.3, Item 3	<p>The last paragraph of this section only partially supports use of risk-informed methods to modify TS completion times. The problem has been technical branches not allowing changes in risk-informed completion times because they disagree with the redundancy available when in a TS Action.</p> <p>Also, the NRC should consider revising Branch Technical Position (BTP) 8-8 to eliminate conflict with R.G. 1.174 and to ensure BTP 8-8 adequately considers risk model insights for one-time or permanent allowable outage time extensions.</p>	<p>Add this as the last sentence. "Therefore, if a licensee submits a request for a change to a Technical Specification Completion Time based on risk-informed methods, it is not necessary to show single failure criteria is preserved during the brief allowable outage time if the requested time meets risk-informed criteria.</p>
2	2.1.1.3, Item 4	<p>This guidance assumes the failure cause or coupling factor is known. It also does not recognize that protective actions for the redundant (vs. diverse) component can reduce total plant risk.</p>	<p>In the third paragraph of this section, add a third approach as follows: "(3) reduce total plant risk by other means".</p> <p>Add this as the last sentence: "For proposed changes that weaken an existing defense against common cause an acceptable mitigating argument could be based on compensatory measures to reduce the risk such as: reducing the total plant risk by protecting diverse or redundant equipment, reducing the initiating event frequency, etc."</p>

<p>3</p>	<p>2.1.1.& 2.1.1.3</p>	<p>Section 2.1.1 lists seven factors to evaluate how the proposed licensing basis change impacts defense-in-depth.</p> <p>Section 2.1.1.3 says it is considered acceptable to use the seven DID evaluation factors described in Section 2.1.1.2 to evaluate the impact of a proposed licensing basis change on DID.</p> <p>Section 2.1.1.3 then says that it is presumed that, prior to the implementation of the proposed licensing basis change, the as-built and as-operated plant is consistent with the DID philosophy.</p> <p>If the as-built and as-operate plant is not consistent with DID philosophy, Section 2.1.1.3 says the licensee and the staff should ensure compliance with existing requirements and implement an appropriate action to address any non-compliances.</p> <p>Section 2.1.1.2 DID evaluation Factor 4 to preserve adequate defense against potential common cause failure maintains the use of diverse components to provide the same safety function to prevent common cause failure from using the same components.</p>	<p>The seven DID evaluation factors may not be the ones which were used to determine a plant's compliance in DID philosophy for issuing the operation license for the plant.</p> <p>The seven DID evaluation factors in RG 1.174 should be consistent with the existing DID philosophy, which was used for the licensing of the as-built as-operated plant.</p>
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