

Risk Evaluation Approaches

The NRC has indicated a need to include a license condition related to their acceptance of the PRA models in plant-specific Safety Evaluations for amendments to adopt TSTF-505. The primary purpose of this would be to specify that only PRA technical approaches (e.g. Fire PRA or Seismic Margin Analysis) included in the application may be used in the RICT program, unless a new LAR is submitted to request approval of a new technical approach.

In lieu of a license condition on PRA methods, the industry proposes adding the following to the TS Risk Informed Completion Time Program to fulfill the NRC's purposes:

The risk evaluation approaches to calculate a RICT are: [Internal PRA to assess internal risk; Fire PRA to assess fire risk; Seismic Margin Analysis (SMA) to assess seismic risk; Individual Plant Examination of External Events (IPEEE) screening to assess the risk from other external hazards (high winds, external floods); and Shutdown Safety Plan to assess shutdown risk].

As the Technical Specifications will state which methods may be used, use of methods not listed would require prior NRC approval. It is not necessary or consistent with the TS to state that prior approval is needed to use methods not listed in the paragraph.