

(1) In the issues matrix we said:

- As stated in the safety evaluation for NEI 06-09, it is necessary for licensees to have a license condition to clarify which changes in PRA methodology require prior staff approval. The staff's proposed language is as follows:

The risk assessment approach, methods, and data shall be acceptable to the NRC, be based on the as-built, as-operated, and maintained plant; and reflect the operating experience at the plant. Acceptable methods to assess the risk from extending the completion times may include methods that are approved for use in the RICT program, or methods generically approved for use by NRC. If a licensee wishes to change its methods, and the change is outside the bounds of the license condition, the licensee will need NRC approval, via a license amendment, of the implementation of the new method in its RMTS program.

This should be reflected in the technical description/analysis of TSTF-505.

This may not be necessary if the TSTF proposes that this be added to TS 5.5.18.

(2) In the issues matrix we also said:

The Model Application includes ENCLOSURE 1 - LIST OF REVISED REQUIRED ACTIONS TO CORRESPONDING PRA FUNCTIONS. The discussion of this Enclosure 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."

During its review of several LARs requesting adoption of TSTF-505 prior to its suspension, the staff noted that the information provided in this enclosure did not provide enough detail for the staff to properly evaluate the information. In addition, the staff has observed some inconsistencies in terminology regarding the use of the terms "train", "system", "subsystem", "division" and "subdivision". In order to promote an efficient review by the staff, the explanation of this enclosure could be expanded to emphasize the need for plant specific detail regarding the safety function(s) under consideration.

This should be expanded to include a discussion of the Conditions that have been identified as not being normally modeled in the PRA. The application should provide details of the model and, if a surrogate is used, a technical justification for the surrogate.