

Draft TSTF-505, "Provide Risk Informed Extended Completion Times – RITSTF Initiative 4B," Revision 2

1.0 Description

The Nuclear Energy Institute (NEI) Risk Informed Technical Specification Task Force (RITSTF) Initiative 4b, "Risk Informed Completion Times with Configuration Risk Management Program or Maintenance Rule Backstop," modifies selected Required Actions to provide an optional risk informed Completion Time (CT). The lead plant for Initiative 4b was South Texas Project, which was approved on July 11, 2007.

The technical justification for Initiative 4b is in Topical Report NEI 06-09, Revision 0-A (hereafter referred to as NEI 06-09-A), "Risk-Informed Technical Specifications Initiative 4B, Risk-Managed Technical Specifications (RMTS) Guidelines," for which the initiative was approved by the Nuclear Regulatory Commission (NRC) on May 17, 2007 (Agencywide Document Access and Management System (ADAMS) Accession No. ML071200238).

This Traveler provides a generic model for implementing RITSTF Initiative 4b as justified in NEI 06-09-A. Plants requesting adoption of this Traveler will only include those changes that can be supported in accordance with NEI 06-09-A. NEI 06-09-A, was issued with the NRC staff's SE attached in the front of the final document. The methodology in the body of NEI 06-09-A, Revision 0, was not changed to incorporate the staff limitations and conditions from the SE. Throughout this Traveler, when reference is made to NEI 06-09-A, it is understood that that the methodology is described in NEI 06-09-A, as modified by the NRC staff's limitations and conditions described in the NRC staff's SE dated May 17, 2007.

The NRC staff identified issues with Traveler TSTF-505, Revision 1, "Provide Risk-Informed Extended Completion Times – RITSTF Initiative 4b," during its review of site-specific license amendment requests (LARs) requesting adoption of a Risk-Informed Completion Time (RICT) program. The NRC notified the TSTF of its concerns in a letter dated November 15, 2016 (ADAMS Accession No. ML16281A021), and suspended its approval of TSTF-505, Revision 1 at that time. As explained in the letter, it became evident during staff reviews of LARs requesting adoption of TSTF-505 that the TSTF-505 description, model application, and many of the changes to the individual technical specifications (TSs) do not reflect the NRC staff's positions, limitations, and conditions from the safety evaluation (SE) of NEI 06-09. In addition, the TSTF-505 model SE uses language directly from the NRC staff's SE of NEI 06-09 for defense-in-depth and safety margins without applying the NRC staff's positions, limitations, and conditions. The NRC staff and stakeholders have resolved the identified issues. The NRC staff developed TSTF-505, Revision 2, to reflect the resolution of the issues and the methodology in NEI 09-06-A, as modified by the NRC staff in its SE.

2.0 Proposed Change

This Traveler is for adopting RITSTF Initiative 4b and NEI 06-09-A. Plants adopting this Traveler must compare the proposed changes to their plant-specific Probabilistic Risk

Assessment (PRA) and incorporate in their plant-specific amendment only those changes for which a RICT can be determined. There may also be plant-specific TSs which do not appear in the Standard Technical Specifications (STS) to which changes of the type presented here may be applied. Therefore, NRC review and approval of this Traveler is based on the acceptability of the format and presentation and the proposed potential scope of applicability. The determination of the actual scope of applicability will be made on a plant-specific basis in accordance with NEI 06-09-A.

When requesting adoption of this Traveler, the licensee must specify each specification and Required Action to which the RICT Program will be applied and, for each Required Action, describe the corresponding function modeled in the PRA.

A new Example is added to Section 1.3, "Completion Times," to describe the use of the optional RICT.

2.1 Use and Application Example 1.3-8

This is quoted from the TSTF letter dated September 27, 2017 (ADAMS Package Accession No. ML17290B229).

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One subsystem inoperable.	A.1 Restore subsystem to OPERABLE status.	7 days <u>OR</u> In accordance with the Risk Informed Completion Time Program
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3. <u>AND</u> B.2 Be in MODE 5.	6 hours 36 hours

When a subsystem is declared inoperable, Condition A is entered. The 7 day Completion Time may be applied as discussed in Example 1.3-2. However, the licensee may elect to apply the Risk Informed Completion Time Program which permits calculation of a Risk Informed Completion Time (RICT) that may be used to complete the Required Action beyond the 7 day Completion Time. The RICT cannot exceed 30 days. After the 7 day Completion Time

has expired, the subsystem must be restored to OPERABLE status within the RICT or Condition B must also be entered.

The Risk Informed Completion Time Program requires recalculation of the RICT to reflect changing plant conditions. For planned changes, the revised RICT must be determined prior to implementation of the change in configuration. For emergent conditions, the revised RICT must be determined within the time limits of the Required Action Completion Time (i.e., not the RICT) or 12 hours after the plant configuration change, whichever is less.

If the 7 day Completion Time clock of Condition A has expired and subsequent changes in plant condition result in exiting the applicability of the Risk Informed Completion Time Program without restoring the inoperable subsystem to OPERABLE status, Condition B is also entered and the Completion Time clocks for Required Actions B.1 and B.2 start.

If the RICT expires or is recalculated to be less than the elapsed time since the Condition was entered and the inoperable subsystem has not been restored to OPERABLE status, Condition B is also entered and the Completion Time clocks for Required Actions B.1 and B.2 start. If the inoperable subsystems are restored to OPERABLE status after Condition B is entered, Conditions A and B are exited, and therefore, the required actions of Condition B may be terminated.

There is a new Chapter 5 program entitled "Risk Informed Completion Time Program" which is invoked when utilizing a RICT. In NEI 06-09-A, this new program is called the Configuration Risk Management Program. That title is not used in the Traveler because some licensees already have a Chapter 5 Configuration Risk Management Program serving a different purpose and the new RICT Program is more descriptive of the purpose of the new program. The Chapter 5 program clarifies that when a RICT is being used, any change to the plant configuration as defined in NEI-06-09-A, Appendix A, must be considered for the effect on the RICT.

2.2 Technical Specification [5.5.15/5.5.18] Risk-Informed Completion Time Program

With the exception of items b. and e. below, this is quoted from the TSTF letter dated September 27, 2017 (ADAMS Package Accession No. ML17290B229), Attachment 1 (ADAMS Accession No. ML17290B238), pages 14 and 15. The wording in item b. was revised to reflect the modes of operation for BWRs. The wording in item e. below is acceptable to provide the appropriate administrative controls, which differs from the TSTF letter.

Risk Informed Completion Time Program

This program provides controls to calculate a Risk Informed Completion Time (RICT) and must be implemented in accordance with NEI 06-09-A, Revision 0, "Risk-Managed Technical Specifications (RMTS) Guidelines." The program shall include the following:

- a. The RICT may not exceed 30 days;
- b. A RICT may only be utilized in MODE 1, 2 [, and 3, and MODE 4 while relying on steam generators for heat removal][, and MODE 3 while relying on the main condenser for heat removal];
- c. When a RICT is being used, any change to the plant configuration, as defined in NEI 06-09-A, Appendix A, must be considered for the effect on the RICT.
 1. For planned changes, the revised RICT must be determined prior to implementation of the change in configuration.
 2. For emergent conditions, the revised RICT must be determined within the time limits of the Required Action Completion Time (i.e., not the RICT) or 12 hours after the plant configuration change, whichever is less.
 3. Revising the RICT is not required if the plant configuration change would lower plant risk and would result in a longer RICT.
- d. For emergent conditions, if the extent of condition evaluation for inoperable structures, systems, or components (SSCs) is not complete prior to exceeding the Completion Time, the RICT shall

account for the increased possibility of common cause failure (CCF) by either:

1. Numerically accounting for the increased possibility of CCF in the RICT calculation; or
 2. Risk Management Actions (RMAs) not already credited in the RICT calculation shall be implemented that support redundant or diverse SSCs that perform the function(s) of the inoperable SSCs, and, if practicable, reduce the frequency of initiating events that challenge the function(s) performed by the inoperable SSCs.
- e. The risk assessment approaches and methods shall be acceptable to the NRC. The plant PRA shall be based on the as-built, as-operated, and maintained plant; and reflect the operating experience at the plant, as specified in Regulatory Guide 1.200, Revision 2. Methods to assess the risk from extending the completion times must be PRA methods used to support this license amendment, or other methods approved by the NRC for generic use; and any change in the PRA methods to assess risk that are outside these approval boundaries require prior NRC approval.

Note: It is necessary to adopt TSTF-439, "Eliminate Second Completion Times Limiting Time from Discovery of Failure to Meet an LCO [Limiting Condition for Operation]," in order to adopt TSTF 505 for those Required Actions that are affected by both Travelers.

Scope

Table 1, Affected Technical Specifications, contains a list of the Required Actions and Completion Times contained in the STS that licensees may propose to include in the RICT Program without providing additional site-specific justification.

Table 2, Conditions Requiring Plant-Specific Technical Justification, contains a list of LCO Requirements and Conditions that may be proposed for inclusion in the RICT Program. If a licensee chooses to include one or more of the listed Conditions within the scope of its RICT Program, the licensee must provide site-specific technical justification to explain why the Condition would not represent a TS loss of specified safety function at its facility.

Note that a plant-specific implementation of this change might not include all of the modifications shown in the Traveler, depending on the plant-specific PRA.

Generally, Required Actions and CTs in the STS are included in the scope of this Traveler unless they meet one of the exclusion criteria below.

1. The Required Action is associated with a Condition that represents a TS loss of specified safety function condition.

Required Actions associated with Conditions that represent a TS loss of specified safety function are outside the scope of this Traveler. For the purposes of this Traveler, a TS loss of function exists when, assuming no concurrent single failure, no concurrent loss of offsite power, or no concurrent loss of onsite diesel generator(s), a safety function assumed in the accident analysis cannot be performed.

For example, if the LCO requires two trains of a system to be OPERABLE, the Condition of having one train inoperable could be eligible for a RICT if the redundant train is capable of fulfilling the safety functions of the system. The Condition of having both required trains inoperable would represent a TS loss of specified safety function because there would be insufficient OPERABLE equipment to fulfill the safety function of the system.

Condition E of TS 3.8.1 is treated uniquely because of its importance to safety. Condition E of TS 3.8.1 is applicable when the two required emergency diesel generators are inoperable. The typical plant design has four sources of alternating current power. If the two required emergency diesel generators are inoperable, the safety function of supplying AC power to the Engineered Safety Features buses can be performed by the offsite power sources. However, only the emergency onsite power source is safety-related and is typically credited for accident analyses that assume a loss of offsite power. If both emergency onsite power sources are inoperable, the condition is treated as TS loss of specified safety function for the purposes of the RICT Program.

In NUREG-1431, Revision 3, "Standard Technical Specifications, Westinghouse Plants," June 2004 (ADAMS Accession No. ML041830612), LCO 3.5.2 Condition A, is applicable when one or more emergency core cooling system (ECCS) trains are inoperable. Condition C of LCO 3.5.2 applies when less than 100 percent of the ECCS flow equivalent to a single OPERABLE ECCS train available. Condition C addresses the configuration with the potential to be a TS loss of function. Therefore, Condition A is not treated as a TS loss of function and is eligible for inclusion in the RICT Program. In NUREG-1430, Revision 3, "Standard Technical Specifications, Babcock and Wilcox Plants," June 2004 (ADAMS Accession No. ML041800598), and NUREG-1432, Revision 3, "Standard Technical Specifications, Combustion Engineering Plants," June 2004 (ADAMS Accession No. ML041830597), the corresponding LCO 3.5.2 Conditions are Conditions B and D. These Conditions are included in Table 2 due to the necessity of verifying that the license-specific TS

include a Condition to address availability of 100 percent of the ECCS flow equivalent to a single OPERABLE ECCS train.

2. Section 2.1 of NEI 06-09-A states that the justification is applicable to Modes 1 and 2 but may be extended on a plant-specific basis to Modes 3 and 4 (with cooling via steam generators) for pressurized water reactors (PWRs) and to Mode 3 (with cooling via the main condenser) for boiling water reactors (BWRs). The Traveler shows changes applicable to a RICT are applicable in Modes 1 and 2 (PWRs and BWRs). Other specifications and Required Actions not shown in this Traveler could be affected by expansion of the applicability to include Modes 3 and 4 (with cooling via steam generators) for PWRs and to Mode 3 (with cooling via the main condenser) for BWRs. Licensees requesting to adopt the RICT Program may adopt the proposed changes only for those Required Actions for which a plant-specific RICT can be determined.
3. Section 2.1 of NEI 06-09-A states that Section 3.1, "Reactivity Control Systems," is excluded. This is true for PWR plants. However, for BWR plants, there is one modeled system in Section 3.1 (Standby Liquid Control) which is included.
4. Section 2.1 of NEI 06-09-A states that Section 3.2, "Power Distribution," is excluded.
5. Section 2.1 of NEI 06-09-A states that Test Exceptions are excluded.
6. The Traveler will not modify Required Actions that direct that other structures, systems, or components (SSCs) be declared inoperable.
7. The Traveler will not modify Required Actions that specify the periodic performance of an action or surveillance on a "once per" basis.
8. The Traveler will not modify Required Actions that specify placing an instrument channel in bypass.
9. The Traveler will not modify Required Actions that require a shutdown due to failure to perform a mitigating action (also known as the "default Condition") and typically worded as "Required Action and associated Completion Time ... not met."
10. The Traveler will not modify Required Actions in Conditions in which variables are not within limit unless a modeled system could be used as a surrogate in calculating a RICT (e.g., using the modeled pressurizer as a surrogate for pressurizer level).
11. The Traveler will not modify Required Actions for systems that do not affect core damage frequency (CDF) or large early release frequency (LERF) or for which a RICT cannot be quantitatively determined.
12. The Traveler will not modify Required Actions that direct the performance of an analysis.

13. The Traveler will not modify Required Actions in Conditions entered during movement of [recently] irradiated fuel or during Core Alterations for plants that haven't adopted TSTF-471.
14. The Traveler will not modify Required Actions in Conditions entered during Operations with the Potential to Drain the Reactor Vessel (OPDRV) in BWRs. The Traveler will not modify Required Actions associated with Reactor Pressure Vessel Water Inventory Control (TSTF-542).
15. The Traveler will not modify Required Actions that currently have a Completion Time of 30 days or more.
16. The Traveler will not modify Required Actions with a Completion Time of "immediately."
17. The Traveler will not modify Required Actions with a Completion Time that is based on a situation rather than a time period (e.g., a Completion Time such as "Prior to entering MODE 4").
18. In order to be within the review performed for the South Texas Project lead plant submittal, the Traveler will only modify Required Actions that specify that a system be restored to OPERABLE status, that require an instrument channel to be placed in trip, or that require isolating an inoperable isolation valve.

Topical Report NEI 06-09-A discusses the application of a RICT to emergent conditions which represent a loss of a specified safety function or inoperability of all required trains or divisions of a system required to be OPERABLE provided one or more of the trains or divisions are considered "PRA Functional," as defined in Section 2.3.1 of NEI 06-09-A. Incorporation of this allowance would require additional analysis and administrative controls beyond those specified in this Traveler to ensure adequate safety margin and defense-in-depth is maintained. The ACTIONS Table items involving loss of function configuration are outside the scope of this Traveler.

Unlike most Travelers which show all changes to be incorporated in the plant-specific TSs, the markup for Revision 1 of this Traveler showed all specifications in the ISTS potentially affected by the proposed changes. The TSTF included comments throughout the markup to explain why certain Required Actions were excluded from the RICT Program. Reviewer's Notes were included in the STS Bases to direct which portions of the STS apply when adopting or not adopting TSTF-505, Revision 1. The markup of the TS has not been revised to reflect the scope of TSTF-505, Revision 2. Tables 1 and 2 of this Traveler should be consulted to determine if a change is within the scope of TSTF-505, Revision 2. The markups are correct for the Conditions that remain within the scope of TSTF-505, Revision 2. Note that the list of Conditions within the scope of this Traveler are based on Revision 3 of the STS NUREGs.

Changes are also included to make related CTs accurate following implementation of the RICT. For example most TS have requirements to close/isolate containment isolation devices if one or more containment penetrations have inoperable devices. This is followed by a requirement to periodically verify the penetration is isolated. By adding the flexibility to use a RICT to determine a time to isolate the penetration, the periodic verification must then be based on the time “following isolation”. Therefore these types of CTs have been revised to account for the time change caused by RICT implementation.

Some Conditions are applicable when “one or more” channels, subsystems, or trains are inoperable. These Conditions have the potential to encompass a TS loss of function situation. The CTs for these Conditions may be modified to permit the application of a RICT. The CTs may be modified by a note as shown below:

[72] hours (i.e., the existing Completion Time)

OR

-----NOTE-----

Not applicable when [all/two/four/both, etc.] required
[channels/subsystems/trains, etc.] are inoperable.

In Accordance with the Risk-Informed Completion Time Program

3.0 Background

This Traveler is intended to improve safety through the incorporation of risk assessment and management techniques in TSs, while reducing unnecessary burden and making TS requirements consistent with the NRC’s other risk-informed regulatory requirements.

For those specifications within the proposed scope of the Traveler, a new, optional CT is provided that may permit continued operation beyond the existing CT within the same Required Action. Use of this new CT requires risk to be assessed, monitored, and managed as measured by the configuration-specific CDF and LERF, using processes and limits specified in NEI 06-09-A. Topical Report NEI 06-09-A also requires compensatory measures or risk management actions, and quantitative evaluation of risk sources for which PRA models may not be available. Additionally Topical Report NEI 06-09-A contains requirements on the scope and technical adequacy of the PRA models.

4.0 Technical Analysis

When the LCO is not met, most specifications provide a fixed CT to permit a licensee to perform required testing, maintenance, or repair activities. Normally, upon expiration of the CT, the requirement to exit the Applicability of the Specification or to follow remedial actions is imposed. The methodology document, NEI 06-09-A, provides a means for

the licensee to extend the CT and thereby delay exiting the Applicability or taking remedial actions, if risk is assessed and managed within the specified limits and programmatic requirements established by the RICT Program. The regulatory requirements for the content of TSs will continue to be met because the TS will continue to have items in the category of LCOs, and the modified TS will continue to provide the requisite reasonable assurance. Only the CT is changed by the methodology documented in NEI 06-09-A. The specific performance capabilities or performance levels of equipment are unchanged, and the remedial actions, including the requirement to shut down the reactor, are also unchanged; only the specific time limits for initiating actions are extended by the methodology documented in NEI 06-09-A.

The Maintenance Rule, 10 CFR 50.65, "Requirements for monitoring the effectiveness of maintenance at nuclear power plants," requires licensees to monitor the performance or condition of SSCs against licensee-established goals, in a manner sufficient to provide a reasonable assurance that these SSCs are capable of fulfilling their intended functions. In addition, 10 CFR 50.65(a)(4) requires the assessment and management of the increase in risk that may result from a proposed maintenance activity. The proposed methodology in NEI 06-09-A uses processes that are consistent with, and complementary to, the requirements of 10 CFR 50.65(a)(4).

The methodology used to determine the RICT, as well as other actions and restrictions, is described in NEI 06-09-A. The TS RICT Program requires the licensee to follow NEI 06-09-A whenever a RICT is used.

As described in NEI 06-09-A, the PRA models must conform to the guidance of Regulatory Guide 1.200, Revision 0, and Capability Category II of the American Society of Mechanical Engineers (ASME) Standard ASME RA-S-2002, "Standard for Probabilistic Risk Assessment for Nuclear Power Plant Applications." In its SE of NEI 06-09-A, the NRC staff noted that Revision 1 to RG 1.200, issued in January 2007, endorsed ASME RA-Sb-2005, "Addenda to ASME RA-S-2002, Standard for Probabilistic Risk Assessment for Nuclear Power Plant Applications." The NRC therefore took exception to this particular part of NEI 06-09-A, and noted that licensees should conform to the updated RG 1.200, Revision 1. In Regulatory Issue Summary 2007-06, "Regulatory Guide 1.200 Implementation," the NRC noted that it would expect licensees to fully address all scope elements consistent with Revision 2 of RG 1.200 by the end of 2009. The NRC's assessment of the licensee's PRA technical adequacy will be based on the updated guidance.

The TSTF prepared a proposed Model Application for TSTF-505, Revision 2, which describes the information required to be submitted in the plant-specific LAR when adopting this Traveler (Attachment 3 from September 27, 2017, TSTF letter; ADAMS Accession No. ML17290B236).

5.0 Regulatory Analysis

5.1 No Significant Hazards Consideration

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed change permits the extension of Completion Times provided risk is assessed and managed within the Risk Informed Completion Time Program. The proposed change does not involve a significant increase in the probability of an accident previously evaluated because the changes involve no change to the plant or its modes of operation. The proposed change does not increase the consequences of an accident because the design-basis mitigation function of the affected systems is not changed and the consequences of an accident during the extended Completion Time are no different from those during the existing Completion Time.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed change does not change the design, configuration, or method of operation of the plant. The proposed change does not involve a physical alteration of the plant (no new or different kind of equipment will be installed).

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No.

The proposed change permits the extension of Completion Times provided risk is assessed and managed within the Risk-Informed Completion Time Program. The proposed change implements a risk-informed configuration management program to assure that adequate margins of safety are maintained. Application of these new specifications and the configuration management program considers cumulative effects of multiple systems or components being out of service and does so more effectively than the current technical specifications.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, the TSTF concludes that the proposed change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

5.2 Applicable Regulatory Requirements/Criteria

The proposed change revises the time requirements for completion of remedial actions permitted by the TSs. The proposed Traveler permits the extension of CTs provided risk is assessed and managed within the RICT Program.

The requirements for TSs are given in 10 CFR 50.36, which requires in 50.36(c)(2) that TS have items in the category of limiting conditions for operation. Further, per 50.36(c)(2)(i), "When a limiting condition for operation of a nuclear reactor is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the technical specifications until the condition can be met." The processes to be performed, the operating procedures, the facility and equipment, the use of the facility, and other technical specifications, including the remedial actions, or the proposals, must collectively provide reasonable assurance that the applicant will comply with the regulations and that the health and safety of the public will not be endangered.

6.0 References

1. Nuclear Energy Institute, Topical Report NEI 06-09, Revision 0, "Risk-Informed Technical Specifications Initiative 4b, Risk-Managed Technical Specifications (RMTS) Guidelines, Industry Guidance Document," November 2006 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML063390639).
2. Golder, Jennifer M., U.S. Nuclear Regulatory Commission, letter to Biff Bradley, Nuclear Energy Institute, "Final Safety Evaluation for Nuclear Energy Institute (NEI) Topical Report (TR) NEI 06-09, 'Risk-Informed Technical Specifications Initiative 4b, Risk-Managed Technical Specifications (RMTS) Guidelines'," dated May 17, 2007 (ADAMS Accession No. ML071200238).
3. Thadani, Mohan C., U.S. Nuclear Regulatory Commission, letter to James J. Sheppard, STP Nuclear Operating Company, "South Texas Project, Units 1 and 2 - Issuance of Amendments Re: Broad-Scope Risk-Informed Technical Specifications Amendments (TAC Nos. MD2341 and MD2342)," dated July 11, 2007 (ADAMS Accession No. ML071780168)

4. U.S. Nuclear Regulatory Commission, NUREG-1431, Revision 3, "Standard Technical Specifications, Westinghouse Plants," June 2004 (ADAMS Accession No. ML041830612).
5. U.S. Nuclear Regulatory Commission, NUREG-1430, Revision 3, "Standard Technical Specifications, Babcock and Wilcox Plants," June 2004 (ADAMS Accession No. ML041800598).
6. U.S. Nuclear Regulatory Commission, NUREG-1432, Revision 3, "Standard Technical Specifications, Combustion Engineering Plants," June 2004 (ADAMS Accession No. ML041830597).
7. U.S. Nuclear Regulatory Commission, NUREG-1433, Revision 3, "Standard Technical Specifications, General Electric Plants, BWR/4," June 2004 (ADAMS Accession No. ML041910194).
8. U.S. Nuclear Regulatory Commission, NUREG-1434, Revision 3, "Standard Technical Specifications, General Electric Plants, BWR/6," June 2004 (ADAMS Accession No. ML041910204).
9. U.S. Nuclear Regulatory Commission, Regulatory Guide 1.200, Revision 1, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities," January 2007 (ADAMS Accession No. ML070240001).
10. U.S. Nuclear Regulatory Commission, Regulatory Issue Summary 2007-06, "Regulatory Guide 1.200 Implementation," dated March 22, 2007 (ADAMS Accession No. ML070650428).
11. American Society of Mechanical Engineers, ASME RA-S-2002, "Standard for Probabilistic Risk Assessment for Nuclear Power Plant Applications," 2002.
12. American Society of Mechanical Engineers, ASME RA-Sb-2005, "Addenda to ASME RA-S-2002, Standard for Probabilistic Risk Assessment for Nuclear Power Plant Applications," 2005.

Attachments:

1. Table 1, Affected Technical Specifications
2. Table 2, Conditions Requiring Plant-Specific Justification