

Enclosure 2

Reactor Oversight Process Task Force FAQ Log
September 21, 2017

Dated October 16, 2017

FAQ Log September 2017

FAQ No.	PI	Topic	Status	Plant/Co.	Point of Contact
17-03	MS	Baseline UA Critical Hours	Introduced April 13 Discussed May 18 Finalized September 21	Generic	Ken Heffner (Certrec) Zack Hollcraft (NRC)

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FAQ 17-03 Baseline Unavailability Critical Hours (Final NRC Response)

Plant: Generic FAQ Based on ROPTF Whitepaper

Date of Event: N/A

Submittal Date: March 23, 2017

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NRC Contact: Zack Hollcraft Tel/email: 301-415-3024/zachary.hollcraft@nrc.gov

Performance Indicator:

MS06, MS07, MS08, MS09, MS10

Site-Specific FAQ (Appendix D)? No

FAQ requested to become effective: When approved.

Question Section:

NEI 99-02 Guidance needing interpretation (include page and line citation):

Currently, NEI 99-02, page F-9, starting at line 36 says “The initial baseline planned unavailability is based on actual plant-specific values for the period 2002 through 2004. (Plant-specific values of the most recent data are used so that the indicator accurately reflects deviation from expected planned maintenance.) These values may change if the plant maintenance philosophy is substantially changed with respect to on-line maintenance or preventive maintenance. In these cases, the planned unavailability baseline value should be adjusted to reflect the current maintenance practices, including low frequency maintenance evolutions.”

Event or circumstances requiring guidance interpretation:

The guidance is silent on whether, if the planned unavailability baseline hours change, a licensee should retain the 2002 to 2004 critical hours as baseline, or revise the baseline critical hours to some other period of operation. As the intent of updating the baseline unavailability is to have the value be a reflection of the current maintenance philosophy, revising the baseline critical hours to those of the most recent three years of operation would be appropriate. By using the most recent three-year period, inappropriate inflation of the baseline unavailability is avoided. If the plant had an extended outage during the 2002-2004 period (the lower denominator would inflate the allowance for planned unavailable during periods without the extended outage).

If licensee and NRC resident/region do not agree on the facts and circumstances explain:

N/A – this FAQ is based on an ROPTF whitepaper.

Potentially relevant existing FAQ numbers: There are no relevant FAQ numbers.

FAQ 17-03 Baseline Unavailability Critical Hours (Final NRC Response)

Response Section:

Proposed Resolution of FAQ:

Since the baseline unavailability value can change as maintenance philosophy changes, , it is appropriate to change the baseline critical hours to those from the most recent three years, rather than retain the critical hours from the original baseline period of 2002-2004.

Special Considerations:

If the plant had an extended outage (e.g., greater than six months) during the 2002-2004 time frame or the most recent three-year period, then baseline values could be erroneously inflated

If appropriate, provide proposed rewording of guidance for inclusion in next revision:

The following should be added to the current guidance on page F-9 of Revision 7, starting at line 42: "If the planned unavailability baseline value is adjusted, the critical hours should be changed to those of the most recent three-year period. If the most recent three-year period includes an extended shutdown (> 6 months), the most recent three-year period that does not include the extended shutdown should be used".

PRA update required to implement this FAQ? No

MSPI Basis Document update required to implement this FAQ? No

NRC Response

The staff agrees with the proposed response as written. NEI 99-02 should be revised as detailed above.