

April 21, 2016

TSTF-14-09
PROJ0753

Members of the PWROG and BWROG Licensing Committees

- SUBJECT:** Clarification of Information Needed from Licensees Adopting TSTF-425, Revision 3, "Relocate Surveillance Frequencies to Licensee Control - RITSTF Initiative 5b"
- REFERENCE:** Federal Register, Notice of Availability of Technical Specification Improvement To Relocate Surveillance Frequencies to Licensee Control - Risk-Informed Technical Specification Task Force (RITSTF) Initiative 5b, Technical Specification Task Force-425, Revision 3, dated July 6, 2009.

The TSTF wishes to clarify the NRC submittal requirements for licensees adopting TSTF Traveler TSTF-425, Revision 3, "Relocate Surveillance Frequencies to Licensee Control - RITSTF Initiative 5b." Recent NRC Requests for Information (RAIs) sent to licensees have stated that the NRC is reviewing the licensee's application against Revision 2 of Regulatory Guide (RG) 1.200, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities." However, the model Safety Evaluation published in the referenced Federal Register Notice of Availability was based on a licensee demonstrating the technical adequacy of their PRA against Revision 1 of RG 1.200. This difference has resulted in confusion regarding the information to be submitted when requesting adoption of TSTF-425. The TSTF has worked with the NRC to clarify the submittal expectations, as documented in this letter.

Background

In the referenced Federal Register Notice (FRN), the NRC announced the availability for adoption by licensees TSTF Traveler TSTF-425, Revision 3, "Relocate Surveillance Frequencies to Licensee Control - RITSTF Initiative 5b." The FRN states that each licensee applying for the changes proposed in TSTF-425 must include documentation regarding the probabilistic risk assessment (PRA) technical adequacy consistent with the guidance in Section 4.2 of Regulatory Guide (RG) 1.200, Revision 1, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment [PRA] Results for Risk-Informed Activities" (ADAMS Accession No. ML070240001).

The FRN included a model application, developed by the NRC staff, to be used by licensees when requesting adoption of TSTF-425, Revision 3. The model application requires licensees to include documentation with regard to PRA technical adequacy consistent with the requirements of Regulatory Guide 1.200, Revision 1, Section 4.2, and to describe any PRA models without NRC-endorsed standards.

The FRN included a model Safety Evaluation to be used by NRC staff for licensee requests to adopt TSTF-425. Under, "Scope of the PRA," the model Safety Evaluation states, "[Licensee] is required to evaluate each proposed change to a relocated surveillance frequency using the guidance contained in NEI 04-10, Rev. 1, to determine its potential impact on risk, due to impacts from internal events, fires, seismic, other external events, and from shutdown conditions."

The Technical Specification Surveillance Frequency Control Program (SFCP) implemented by licensees under TSTF-425 requires Surveillance Frequency changes to be made following the guidance in NEI 04-10, Revision 1, "Risk-informed Technical Specifications Initiative 5B, Risk-Informed Method for Control of Surveillance Frequencies," which was approved by the NRC on September 19, 2007 (ADAMS Accession No. ML072570267). NEI 04-10, Revision 1, Step 5, "RG 1.200 PRA Technical Adequacy," states, "Plants implementing TSTF-425 shall evaluate their PRAs in accordance with this regulatory guide," which is Revision 1 of Regulatory Guide 1.200.

RG 1.200, Revision 2, which became effective in 2010 (subsequent to NRC approval of NEI 04-10 and TSTF-425), endorsed a revision to the PRA standard which combined new requirements for PRA models for external hazards, including fire and seismic hazards, with the existing internal events PRA standard. NEI 04-10, Rev. 1, does not require external hazards, including fire and seismic events, to be assessed quantitatively using PRA models, instead providing for qualitative and other quantitative methods to be used.

The TSTF notes that some editorial revisions and clarifications to the internal events PRA standard were also included in the new combined standard, and the NRC, in RG 1.200, Revision 2, endorsed this revised standard and did not identify any exceptions. Consistent with the information provided in Regulatory Issues Summary (RIS) 2007-06, "Regulatory Guide 1.200 Implementation," the NRC will use Revision 2 of RG 1.200 to assess technical adequacy of the PRA used to support risk-informed applications received after March 2010. Therefore, licensees who submit PRA quality information for their internal events PRA based on RG 1.200, Revision 1, should perform a self-assessment to RG 1.200, Revision 2, for the internal events PRA.

Resolution

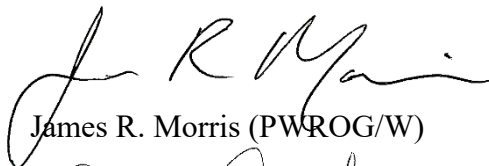
The TSTF and NRC agreed to the following guidance regarding submittal of license amendment requests to adopt TSTF-425:

1. Licensees using qualitative or bounding¹ methods to evaluate external events, fire risk, or shutdown events in accordance with NEI 04-10, Revision 1, will identify that fact in their submittal and summarize the method. Such submittals will not use RG 1.200 to support the technical adequacy of the methods, consistent with NRC staff positions.

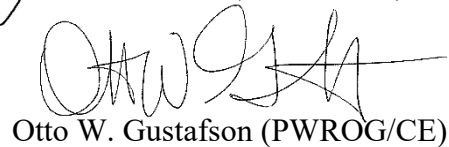
¹ The bounding analysis should be performed in accordance with NEI 04-10, Rev. 1, Step 10b, and should also be based on risk insights and analysis documented in the Individual Plant Examination of External Events (IPEEE) report with consideration of the IPEEE accident sequences, as well as relevant operating experience and additional risk insights obtained since the IPEEE study, in the context of the current plant configuration and operation.

2. Licensees proposing to use a quantitative method of evaluating external events or fire risk using an NRC approved method referenced in RG 1.200, Revision 2, will identify that fact in their submittal, and include appropriate information for NRC review in accordance with Section 4.2 of RG 1.200, Revision 2, for the applicable PRA models. This includes submitting all peer review F&Os that have not been closed by a subsequent full-scope or focused-scope peer review, and addressing the impact of those F&Os on the application.
3. Licensees should submit PRA quality information for their internal events PRA against RG 1.200, Revision 2, submit all peer review F&Os associated with the Internal Events PRA that have not been closed by a subsequent full-scope or focused-scope peer review, and address the impact of those F&Os on the application. If the peer reviews were performed against RG 1.200, Revision 1, the licensee should also submit all the F&Os from the self-assessment performed against RG 1.200, Revision 2.
4. Licensees should describe in their submittal how the separation of failure rates into cyclic demand-related and standby time-related failure contributions will be performed, consistent with the guidance in NEI 04-10, Revision 1, Section 4.0, Step 8.

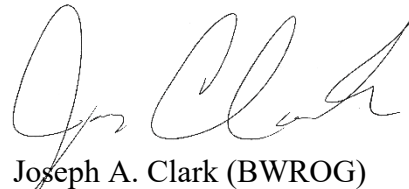
Should you have any questions, please contact us.



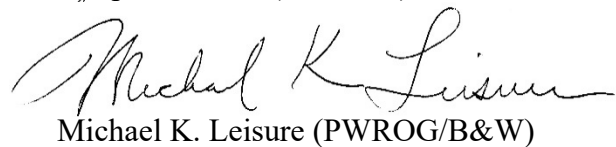
James R. Morris (PWROG/W)



Otto W. Gustafson (PWROG/CE)



Joseph A. Clark (BWROG)



Michael K. Leisure (PWROG/B&W)