

TSTF-569, "Revise Response Time Testing Definition"
Request for Additional Information

By letter dated February 8, 2018, the Technical Specifications Task Force (TSTF) submitted Revision 0 of traveler TSTF-569, "Revise Response Time Testing Definition" (Agencywide Documents Access and management System (ADAMS) Accession No. ML18039A003). The regulation at Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.36(c)(3), *Surveillance Requirements*, states: "Surveillance requirements are requirements relating to test, calibration, or inspection to assure that necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met." The NRC staff requires additional information to confirm that Response Time Testing (RTT) surveillance tests, excluded for previously unanalyzed components, will be based on verifiable methodologies.

1. The Traveler TSTF-569 refers to performance of a similarity analyses of NRC-approved methodologies as a basis for allowing licensees to modify RTT requirements. The NRC staff notes that the approved methodologies, though similar, were not found to be identical. It will therefore be necessary for licensees to perform an evaluation of similarity between different verification methods using an established set of criteria. Describe the criteria that will be used when comparing new, but unapproved methodologies, to methodologies that have been approved by the NRC.

As an example, topical reports WCAP-13632-P-A and CEOG NPSD-1167-A reference the EPRI report NP-7243 and its associated methodology. However, both of these topical reports provide additional evaluations for sensors that were not within the scope of the EPRI report. These additional analyses included different amounts of supporting plant data and in some cases included similarity of design analyses instead of using the methodology established in the EPRI document. While these alternate methodologies were ultimately deemed acceptable by the NRC, they included changes to the methodology that had originally been applied. If licensees are to compare methodologies to determine if a new methodology is consistent with an approved methodology, then a set of comparative criteria should be established.

2. In addition to approving the methodology used for EPRI Report NP-7243, the NRC safety evaluation of WCAP-13632-P, "Elimination of Pressure Sensor Response Time Testing Requirements," dated September 5, 1995 (ADAMS Accession No. ML18023A067) includes several conditions for its use in eliminating RTT requirements. Specifically, there are four actions required when licensees reference the WCAP report for elimination of RTT surveillance requirements. Explain whether or not these or other similar conditions will be included in prospective methodologies. If so, then explain how these conditions will be implemented and verified to assure acceptable application of the selected methodologies.