



# Palisades Nuclear Plant Presentation

September 20, 2018



## **Palisades Nuclear Plant (PNP) License Amendment Request (LAR) Pre-Application Meeting**

**Relocate Specific Surveillance Frequencies  
to a  
Surveillance Frequency Control Program (SFCP)**

# Agenda

- Introductions
- Purpose
- Submittal Format
- Change Summary
- Regulatory Basis
- Industry Precedent
- PNP Variations
- PRA Adequacy
- LAR Schedule
- Questions

# Purpose

- Adopt Technical Specifications Task Force (TSTF)-425 Traveler for NUREG-1432, *Standard Technical Specifications Combustion Engineering Plants*
- Relocate Specific PNP Technical Specification (TS) Surveillance Requirement (SR) Frequencies to a SFCP
- Allow PNP to revise SR Frequencies per NEI 04-10, Revision 1, *Risk-Informed Technical Specification Initiative 5B, “Risk-Informed Method for Control of Surveillance Frequencies”*

# Submittal Format

- Consistent with TSTF-425 Model Application
  - Includes additional TSTF-425 to PNP Cross Reference Attachment
- Cover letter plus seven attachments
- Includes four TSTF-425 to PNP TS Variations Comparison tables
  - PNP Site Specific TS Surveillance Requirements
  - PNP TS Section Number Differences
  - TSTF-425 (CEOG STS) Changes Not in PNP TS
  - TSTF-425 (CEOG STS) Changes Not Applicable to PNP Design

# Change Summary

- Relocates specific PNP TS SR frequencies to a SFCP
- Consistent with TSTF-425, Revision 3, *Relocate Surveillance Frequencies to Licensee Control – Risk Informed Technical Specification Task Force (RITSTF) Initiative 5b*
- Adds a new program, the SFCP, to TS Section 5, Administrative Controls
- Incorporates changes to TSTF-425 recommended by NRC letter, *Notification of Issue with NRC-Approved Technical Specifications Task Force (TSTF) Traveler TSTF-425, Revision, Issued on April 14, 2010*

# Regulatory Basis

- TSTF-425, Revision 3, and the NRC's model safety evaluation published in the Notice of Availability dated July 6, 2009 (74 FR 31996)
- Regulatory Guide 1.200, *An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities*, Revision 2
- NUREG-1432, *Standard Technical Specifications Combustion Engineering Plants*
- Nuclear Energy Institute (NEI), 04-10, Revision 1, *Risk-Informed Technical Specifications Initiative 5b, Risk-Informed Method for Control of Surveillance Frequencies*, dated April 2007

# Industry Precedent

- Cooper Nuclear Station per License Amendment No. 258 issued on March 31, 2017
- D.C. Cook Units 1 and 2 per License Amendment Nos. 334 and 316, respectively, issued on March 31, 2017
- Brunswick Units 1 and 2 per License Amendment Nos. 276 and 304, respectively, issued on May 24, 2017



# PNP Variations

- STAGGERED TEST BASIS definition retained to support PNP TS SRs in Section 5.5.16, *Control Room Envelope Habitability Program*
- PNP TS SRs, in some cases, are worded differently than, or not included in, TSTF-425, however, they meet the relocation criteria
- PNP TS section numbering, in some cases, does not exactly match TSTF-425 section numbering. These are editorial changes.

# PRA Adequacy

- NRC Regulatory Guide 1.200, Revision 2 Compliant
- ASME/ANS PRA standard, RA-Sa-2009 Compliant
- Meets NEI 04-10 requirements for a risk-informed Technical Specification Interval (Frequency) change program

# Current PRA Models

- Internal Events PRA Model Revision PSAr3.3.0
- Internal Flooding PRA Model
- Internal Fire PRA Model

# PRA Open Items

- 14 Internal Events Findings remain open after Peer & Closure Reviews
- One plant change not yet implemented which may potentially impact the PNP PRA.
- Significant (mainly for fire) NFPA 805 modifications will be installed in the refueling outage this fall.

# F&Os Closure

- PNP Internal Events PRA F&O Closure Review Conducted, April 2018
- Followed NEI 05-04/07-12/12-06 Appendix X, “Closeout of F&Os”, March 2017
- 38 of 52 Internal Events Findings Closed per Closure Review
- 14 Internal Events Findings Remain Open

# LAR Schedule

- Plan to submit by the end of September 2018
- Request NRC approval by September 30, 2019
- Request a 90 day implementation period



# QUESTIONS?

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