

NRC INSPECTION MANUAL

APOB

INSPECTION MANUAL CHAPTER 0609 APPENDIX G, ATTACHMENT 2

PHASE 2 SIGNIFICANCE DETERMINATION PROCESS TEMPLATE FOR PWR DURING SHUTDOWN

Effective Date: 03/01/2020

TABLE OF CONTENTS

0609G Att 2-01	Purpose.....	1
01.01	ENTRY CONDITIONS FOR SDP-RELATED INSPECTION FINDING.....	1
01.02	MANAGEMENT DIRECTIVE 8.3 ENTRY.....	1
01.03	APPLICABILITY.....	1
0609G Att 2-02	LIMITS AND PRECAUTIONS.....	1
0609G Att 2-03	ABBREVIATIONS AND DEFINITIONS.....	3
0609G Att 2-04	PROCEDURE FOR SIGNIFICANCE DETERMINATION.....	6
Step 4.1	- Transition from SDP Phase 1.....	6
Step 4.2	- Determine if the finding is a precursor to an initiating event (a loss of the DHR function) or a condition finding.....	6
Step 4.3	- Process for Assessing Precursor Findings.....	6
Step 4.4	- Process for Assessing SDP Condition Findings.....	9
Step 4.5	- Process for Assessing Events Under MD 8.3.....	11

List of Tables

Table 1	- Initiating Event Likelihood (IELs) for LOLC Precursors.....	15
Table 2	- Initiating Even Likelihoods (IELs) for LOOP Precursors.....	16
Table 3	- Initiating Event Likelihood (IELs) for Loss of Inventory (LOI) Precursors.....	17
Table 4	- Initiating Event Likelihoods (IELs) for LORHR Precursors.....	18
Table 5	- Initiating Even Likelihoods (IELs) for Condition Findings – PWRs.....	19
Table 6	- Mitigation Capability Credits for Installed Equipment.....	20
Table 7	- Credit for Temporary Equipment.....	21
Table 8	- Definitions and Characterizations of Time Windows from Surry Shutdown PRA.....	22
Table 9	- Counting Rule Worksheet.....	24

List of Figures

Figure 1	- Determination of Applicable POSs and Time Windows – PWRs.....	14
Figure 2	- Event Tree for Loss of Inventory – PWR POS – 1.....	45
Figure 3	- Event Tree for Loss of Inventory – PWR POS – 2.....	46
Figure 4	- Event Tree for Loss of Inventory PWR POS - 3.....	47
Figure 5	- Event Tree for Loss of Level Control - PWR POS - 1.....	48
Figure 6	- Event Tree for Loss of Level Control – POS – 2.....	49
Figure 7	- Event Tree for Loss of Offsite Power – PWR POS – 1.....	50
Figure 8	- Event Tree for Loss of Offsite Power – PWR POS-2.....	51
Figure 9	- Event Tree for Loss of RHR – PWR POS-1.....	52
Figure 10	- Event Tree for Loss of RHR – PWR POS – 2.....	53

List of Worksheets

Worksheet 1	- Loss of Level Control in POS 1 (RCS Closed)
Worksheet 2	- Loss of Level Control in POS 2 (RCS Vented)
Worksheet 3	- Loss of Offsite Power in POS 1 (RCS Closed)
Worksheet 4	- Loss of Offsite Power in POS 2 (RCS Vented)
Worksheet 5	- Loss of Inventory in POS 1 (RCS Closed)
Worksheet 6	- Loss of Inventory in POS 2 (RCS Vented)
Worksheet 7	- Loss of Inventory in POS 3 (Cavity Flooded)

Worksheet 8 – Westinghouse 4-Loop Plant Loss of RHR in POS 1 (RCS Closed)
Worksheet 9 – Westinghouse 4-Loop Plant Loss of RHR in POS 2 (RCS Vented)

The shutdown Significance Determination Process (SDP) consists of three phases: Phase 1, Initial Screening and Characterization of Findings; Phase 2, Initial Risk Significance Approximation and Basis; and Phase 3, Risk Significance Finalization and Justification. Inspection Manual Chapter (IMC) 0609 Appendix G, Attachment 1, Shutdown Operations Significance Determination Process **Phase 1 Initial Screening and Characterization of Findings** is used by inspectors to conduct the phase 1 screening analysis. This template is used by SRAs or headquarters risk analysts to perform phase 2 analyses for certain PWR shutdown findings discussed below.

01.01 ENTRY CONDITIONS FOR SDP-RELATED INSPECTION FINDING

This template provides a simplified risk-informed framework to estimate the increase in core damage frequency (CDF) during shutdown operations due to findings that are identified as requiring quantitative assessment from the Phase 1 screening in IMC 0609 Appendix G, Attachment 1.

01.02 MANAGEMENT DIRECTIVE 8.3 ENTRY

Procedures are given in **Section 4** for using this template to perform quantitative assessment of shutdown events to satisfy Management Directive (MD) 8.3.

01.03 APPLICABILITY

The process in this template is designed to provide SRAs with a simple, scrutable probabilistic risk framework for use in identifying potentially risk-significant shutdown issues within the Initiating Events, Mitigation Systems, and Barrier Integrity cornerstones. The results from this SDP tool are intended to facilitate communication on the basis of risk significance between the NRC and licensees.

02.01 LIMITS

This template is a simplified tool that generates an order-of-magnitude assessment of the risk significance of inspection findings during shutdown. **If appropriate, a more detailed risk assessment may be performed in an SDP Phase 3 evaluation, especially if the analyst feels that the risk is not being properly assessed in the Phase 2 evaluation. Program guidance in IMC 0609, Attachment 5, "Inspection Finding Review Board" and IMC 0609, Attachment 1, "Significance and Enforcement Review Panel Process," should be followed to determine if a planning SERP is required before committing significant resources to a detailed risk evaluation in a Phase 3 analysis.**

02.02 PRECAUTIONS

- The SRA or analyst should consider each evaluated Core Damage sequence using the event trees **included at the end of this procedure** to ensure that the scenario makes sense for the deficiency. The variability of plant configurations at shutdown and timing issues may result in performance deficiencies which do not directly map on the event trees. Contact a risk analyst in NRR/APOB for assistance if needed.
- The SRA or analyst must understand: (1) the differences between precursor and condition findings, (2) the definitions of the plant operational states (POSSs), and (3) the definitions of the shutdown initiating events. **These terms are defined in IMC 0609, Appendix G.**
- The availability of standby reactor coolant system (RCS) injection along with operator error drives shutdown risk. As long as standby injection is available, in most cases, standby injection buys time for other operator recovery actions such as: leak path termination and residual heat removal (RHR) recovery. If there are factors that could render the standby RCS injection unavailable such as: gas intrusion or support system unavailability, then these factors (assumptions) become risk significant and should be assessed carefully.
- Upon RWST depletion and long term failure of RHR, recirculation of RCS inventory from the sump is not credited in this phase 2 model except when the refueling cavity is flooded, since: (1) for many licensees, the low pressure injection pumps that are necessary for recirculation are the same pumps used for RHR, and (2) there is a high likelihood that trash accumulated during the outage could block the sump screens.
- Some findings are not covered by these templates and go directly to Headquarters for Phase 3 analysis. Examples of such findings are as follows:
 - Potential over-pressurization of low-pressure piping and deficiencies associated with maintaining low temperature over pressure protection.
 - Use of Nozzle Dams without an adequate RCS vent path that would prevent the RCS from re-pressurizing above 25 psig following an extended loss of RHR (25 psi represents an approximate differential pressure capability for the nozzle dams).
 - Findings that increase the likelihood of having a boron dilution event such as the source range monitors being inoperable or the RWST having boron concentrations lower than Technical Specifications prescribed values.
 - **Findings involving open cold leg penetrations without an adequate, large hot leg vent path (such as a steam generator plenum manway) are a concern due to the potential of creating a hot leg to cold leg differential pressure that could force water out of the core. Vent paths in the pressurizer or reactor vessel head are often not adequate to prevent pressurization of the reactor coolant system after the boiling point is reached. Information Notice 88-36 provides more information.**
- Findings that involve containment closure are assessed using IMC 0609 Appendix H.
- **AP1000 plants are not modeled in this procedure, and instead of performing a Phase 2 SDP for those situations, the SRA or risk analyst are to perform a risk analysis using the generic AP1000 standardized plant analysis risk (SPAR) model. The AP1000 SPAR model is modeled for shutdown events.**
- **Findings that involve freeze seals that are installed in systems connected to the RCS where failure could lead to a loss of inventory are not covered by these worksheets and should go directly to Headquarters for a Phase 3 analysis.**

- It has been identified that it's possible for operator dominated sequences to have human error probability (HEP) values that are below levels recommended in the Risk Assessment of Operational Events (RASP) manuals Volumes 1 and 4 when following this procedure. Analysts should be cognizant of this potential and pay closer attention to operator action dominated sequences. If an analyst feels that this procedure is not adequately capturing the risk, they may depart from this procedure and perform a Phase 3 detailed risk assessment. Refer to IMC 0609, Attachment 5, and IMC 0609, Attachment 1 for guidance.

0609G Att 2-03 ABBREVIATIONS AND DEFINITIONS

03.01 ABBREVIATIONS

CETs	Core Exit Thermocouples
CD	Core Damage
High Decay Heat	Decay heat of early time window
Low Decay Heat	Decay heat of late time window
CCW	Component Cooling Water
DHR	Decay Heat Removal
ECCS	Emergency Core Cooling System
IEL	Initiating Event Likelihood
INDIC	Indication
IMC	Inspection Manual Chapter
LOI	Loss of Reactor Inventory Initiating Event
LER	Licensee Event Report
LOOP	Loss of Offsite Power
LORHR	Loss of RHR Initiating Event
OP	Operator
POS	Plant Operational State
PRA	Probabilistic Risk Assessment
RCS	Reactor Coolant System
RHR	Residual Heat Removal
ROP	Reactor Oversight Process
SDP	Significance Determination Process
SG	Steam Generator
SG PORV	Steam Generator Power Operated Relief Valve
SRW	Service Water
TBB	Time to Boiling
TW	Time Window
TW-E	Early Time Window, before refueling operation
TW-L	Late Time Window, after refueling operation

03.02 DEFINITIONS

For a complete list of definitions refer to IMC 0609, Appendix G.

Available - A piece of equipment is considered available if: (1) it can be put into service within half the time that is needed **before** the equipment **will be used** to perform its function, (2) procedures or standing orders exist for using the equipment to meets its intended function, (3) all necessary supporting systems (**such as AC power, cooling water, and DC control power**) can

be put into service within half the time that is needed before the equipment will be used to perform its function, and (4) operators have been trained for using the equipment for the given situation.

Cavity Flooded - An RCS condition with the reactor head removed and the water level raised to the refuel floor.

Gravity Feed — Gravity feeding is the process of adding water to the RCS from a storage source (e.g., condensate storage tank or refuel storage tank) without an active component (e.g., pump). It requires the water source to be higher than the reactor and the reactor to be at or capable of reaching atmospheric pressure. Gravity feeding may be credited if gravity feed is expected to be available AFTER RCS boiling initiates. To credit Gravity Feed, the analyst needs to consider the following factors that can negate the elevation head provided by the RWST or other sources of RCS inventory: (1) pressure drops in the surge line, (2) entrained water accumulating in the pressurizer, (3) RCS vent paths that are restricted (to control loose parts or control off gassing).

Mid-loop Operation - Mid-loop conditions exist whenever the RCS water level is below the top of the flow area of the hot legs at the junction with the reactor vessel.

Operation with Potential to Drain Reactor Vessel - A planned maintenance evolution that if it is not conducted properly can lead to a loss of inventory event. Therefore, any issues with operations with potential to drain the reactor vessel should be evaluated using the appropriate LOI criteria.

Reduced Inventory Operations - As defined in Generic Letter 88-17, reduced inventory operation exists whenever the reactor vessel water level is lower than 3 feet below the reactor vessel flange.

RCS Vented - The RCS is considered vented with such that (1) SG heat removal cannot be sustained, and (2) the vent path is large enough to support feed and bleed. Examples of vent paths include: open pressurizer manways, safety relief valve removal, or vessel head removal.

RWST Depletion - RWST level reaches the level that requires makeup or recirculation to continue injection to RCS.

Self-Limiting LOI - These are loss of inventory events where the leakage point is above the location where the RHR system attaches to the RCS. Therefore, the leakage will stop without human intervention before the RHR/SDC system is lost. For these types of LOIs there shall be no reliance on manual or automatic actions.

Shutdown Operations - Shutdown Operation exists during refueling outages, forced outages, and maintenance outages starting when the plant has met the entry conditions for RHR/DHR and cooling has been initiated, and ending when the plant is heating up and RHR/DHR has been secured.

Types of Shutdown Findings

Precursor Finding - Inspection Findings that: Inspection findings that: (1) cause an event (e.g., a loss / interruption of the operating train of RHR/DHR) or, (2) increase the likelihood of an event.

Condition findings - Inspection findings that only involve a degradation of the licensee's capability to mitigate an event if an event were to occur. Findings only affecting the standby train of RHR are condition findings.

Shutdown Initiating Events

Loss of RHR (LORHR) - Includes losses of RHR/DHR resulting from failures of the RHR/DHR system (such as RHR pump failure) or failures of the RHR/DHR support systems other than offsite power.

Loss of Offsite Power (LOOP) - Includes losses of offsite power which cause a loss of RHR.

Loss of Reactor Inventory (LOI) - Includes losses of RCS inventory that cause or **could cause** a loss of RHR due to loss of RHR pump suction.

Loss of Level Control (LOLC) - This initiating event category includes: (1) the operator overdrains the RCS to reach midloop conditions such that RHR is lost, and (2) the operator fails to maintain level or flow control while in midloop such that the RHR function is lost.

Overdrain (OD) - Overdrain is intended to capture those events where while the RCS is being drained, from one target level range to a second lower range, the evolution is not stopped within the desired final range. For example, starting level is one foot below the reactor flange and the target range is six to twelve inches above the top of the hotleg. If the drain down evolution was not stopped until level reached the top of the hotleg, then an overdrain event has occurred.

Plant Operational States (POSSs)

POS 1 - This POS starts when the RHR system is put into service. The RCS is closed such that a steam generator(s) could be used for decay heat removal, if the secondary side of **each** steam generator(s) **has sufficient inventory to be considered available as a heat sink**. The RCS may have a bubble in the pressurizer. This POS ends when the RCS is vented such that the steam generators cannot sustain core heat removal. This POS typically includes Mode 4 (hot shutdown) and portions of Mode 5 (cold shutdown).

POS 2 - This POS starts when the RCS is vented such that: (1) the steam generators cannot sustain core heat removal and (2) a sufficient vent path exists for feed and bleed. This POS includes portions of Mode 5 (cold shutdown) and Mode 6 (refueling). Reduced inventory operations and midloop operations with a vented RCS are subsets of this POS.

NOTE: **Findings** occurring during vacuum refill of the RCS require use of the POS 1 event trees.

POS 3 - This POS represents the shutdown condition when the refueling cavity water level is at or above the minimum level required for movement of irradiated fuel assemblies within containment as defined by Technical Specifications. This POS occurs during Mode 6.

Time Windows

Early Time Window (TW-E) - This time window represents the time before POS 3 is entered. The decay heat is relatively high. The reactor is either in POS 1 or 2.

Late Time Window (TW-L) - This time window represents the time after POS group 3. The decay heat is relatively low.

0609G Att 2-04 PROCEDURE FOR SIGNIFICANCE DETERMINATION

Step 4.1 – Transition from SDP Phase 1

Use the Information Gathered in the Phase 1 process to identify the set of equipment that the licensee planned to meet the following safety functions: Standby RCS injection, RCS pressure control, and steam generator cooling if applicable.

Caution: If the finding required a licensee to enter into a high-risk POS (such as reduced inventory conditions) or increased the time the licensee remained in a high-risk POS, call the PRA Branch (APOB) in NRR for assistance in estimating the average CDF of the POS as a basis for evaluating the delta CDF for the finding. An example of such a finding is the following. A licensee exited midloop conditions prematurely due to leaking SG nozzle dams because the incorrect nozzle dam pins were used. As a result, the licensee re-entered midloop conditions. The delta CDF of this finding is represented by the risk of draining the vessel for the second time to reach midloop conditions added to the risk of the additional time spent at midloop beyond what was originally anticipated.

Step 4.2 – Determine if the finding is a precursor to an initiating event (a loss of the DHR function) or a condition finding.

NOTE: Precursor findings: (1) cause an event (e.g., a loss / interruption of the operating train of RHR/DHR) or (2) increase the likelihood of an event. Condition findings only involve a degradation of the licensee’s capability to mitigate an event if an event were to occur. Findings only affecting the standby train of RHR are condition findings. The template treats precursor and condition findings differently.

Go To Step 4.3 for Precursor Findings

OR

Go To Step 4.4 for Condition Findings

NOTE: If this tool is being used to assess a shutdown event under Management Directive 8.3, Go to Step 4.5.

Step 4.3 – Process for Assessing Precursor Findings

Step 4.3.1 – Identify each time window (TW) and plant operation state (POS) where the finding could have occurred.

Figure 1 defines the POS and TWs for a PWR plant. It also shows the relationship between the POS and the modes defined in the Technical Specifications.

Step 4.3.2 – Determine the IEL.

The initiating event likelihood (IEL) is the conditional likelihood of having a loss of the RHR function given the occurrence of the **findings**.

- IF a finding increases the likelihood of a loss of level control (LOLC) or actually caused a LOLC, THEN LOLC is the applicable initiating event. Use Table 1 to determine the IEL. Go to Step 4.3.3.
- IF a finding increases the likelihood of a loss of offsite power (LOOP) or actually caused a LOOP, THEN LOOP is the applicable initiating event. Use Table 2 to determine the IEL. Go to Step 4.3.3.
- IF a finding increases the likelihood of a loss of reactor inventory (LOI) or actually caused a LOI, THEN LOI is the applicable initiating event. Use Table 3 to determine the IEL. Go to Step 4.3.3.
- IF a finding increases the likelihood of a loss of the operating train of RHR (LORHR) or actually caused a LORHR (except for LOOP and LOI), THEN LORHR is the applicable initiating event. Use Table 4 to determine the IEL. Go to Step 4.3.3.
- IF a finding involves the RHR support systems (except for LOOP and LOI), THEN LORHR is the applicable initiating event. Use Table 4 to determine the IEL. Go to Step 4.3.3.

Step 4.3.3 – Use the SDP worksheet.

Choose the SDP worksheet that contains the POS and initiating event that were determined to be applicable in steps 4.3.1 and 4.3.2. **The SDP worksheets are included at the end of this procedure.**

EXCEPTIONS:

- (1) For LOI POS 1 if RCS < 200F, use the POS 1 LOLC worksheets and event trees.
- (2) If failure of the cavity seal could occur following LOOP or SBO, use the LOOP POS 2 worksheet.

Step 4.3.4 – Enter the time to RCS boiling.

Enter the time to RCS boiling and an approximate time to core uncover/core damage in the first line of the Worksheet.

Table 8 can be used to approximate a time to core damage from hot leg midplane conditions. **Other tools exist as well, including an electronic Core Uncovery Calculator located on the RASP Tool Box web page, or by using licensee values if available.**

Step 4.3.5 – Fill-in the IEL determined in step 4.3.2 in each row of the lower section of the applicable worksheet.

Step 4.3.6 – Determine the credit for each top event function.

Determine the credit for each top event function.

A. Verify that the licensee has the **important** instrumentation referenced for the top event function.

NOTE: If the licensee does not have the referenced instrumentation available or the referenced instrumentation is not reflective of RCS conditions, then the default operator credit **MUST** be decreased by two.

B. To obtain the Equipment Credit, credit each available system that is (1) capable of maintaining the top event function and (2) is not impacted by the finding. Use the event tree associated with the worksheet to help understand the successes and failures associated with each accident sequence. Use guidance in Tables 6 and 7 to determine equipment credits. Document key assumptions.

C. To obtain the Operator Credit, use the default operator credit unless any of the following four conditions are applicable:

1. If the referenced instrumentation is missing or misleading, then decrease the operator credit by two.
2. The default time is incorrect and significantly reduced. If the diagnosis time is less than 20 minutes OR the time to perform the action is approximately the time required, then decrease the operator credit by one.
3. If the action is complicated by missing or inaccessible equipment, steam or high radiation, or loop seals for venting pumps, then decrease the operator credit by two.
4. If the procedures are incomplete for the shutdown plant configuration, then decrease the operator credit by one.

NOTE: If the default operator credit is changed and results in a negative operator credit, then the operator credit is zero.

D. Determine the Credit for Function for each Top Event Function needed. Select the lower of Equipment Credit and Operator Credit and enter the value in this column.

Step 4.3.7 – Quantification of Core Damage Scenarios

Quantify each accident scenario by adding the credits for IEL + Mitigation Credit. Enter the sum in the Result column.

NOTE: For phase 2 analyses, the recovery credit is not used.

Step 4.3.8 – Identifying the frequency of finding occurrence

Select between Condition A or B.

A. If the **finding** occurred during an outage (forced outage, refueling outage, etc.), the **preliminary** color of the finding is determined by using **Table 9 – Counting Rule Worksheet**. The resulting ICCDP associated with the **finding** is interpreted as the addition to the licensee's total CDF contribution over the previous year (previous 12 months). Therefore, the resulting ICCDP becomes the increase in delta CDF.

B. If the deficiency needs a random event to reveal the deficiency (e.g. at Palisades, the digging of a sign revealed underground protective cabling common to both offsite power sources outside the protected area), then the frequency of the random event (1/32 calendar years of operation) is multiplied by:

The Frequency that the licensee enters an outage (1 outage per 18 months) * (12 months/ calendar year) *(Number of Days of POS 1 operation/ outage) * (1 calendar year/365 days) *(CCDP of POS 1 operation)

Added to:

The Frequency that the licensee enters an outage (1 outage per 18 months) * (12 months/ calendar year) *(Number of Days of POS 2 operation/ outage) * (1 calendar year/365 days) *(CCDP of POS 2 operation).

Step 4.4 – Process for Assessing SDP Condition Findings

NOTE: Only the core damage scenarios impacted by the finding are quantified.

Step 4.4.1 – Select the applicable initiating events.

Select the applicable initiating events (the lost function causes the failure of a top event used to mitigate the initiating event scenario) by identifying the equipment or safety functions affected and determine the initiating event scenarios that must be evaluated (i.e., the affected function plays some role in mitigating the initiating event scenario).

Step 4.4.2 – Determine the exposure times.

Determine the exposure times for the degraded condition in the mitigating system. A separate exposure time must be determined for each POS for findings that span one or more POS. Using Table 5, determine an IEL for each applicable initiating event in each applicable POS.

Step 4.4.3 – Choose the SDP Worksheet(s)

Choose the SDP worksheet(s) that contain the POSs and initiating events that were determined to be applicable in Steps 4.4.1 and 4.4.2. Perform the following steps on the Worksheet for each applicable POS and initiating event. The SDP worksheets are included at the end of this procedure.

Step 4.4.4 – Enter the time to RCS boiling

Enter the time to RCS boiling and an approximate time to core uncover/core damage in the first line of the worksheet.

Table 8 can be used to estimate time to core damage from hot leg midplane conditions. Other tools exist as well, including an electronic Core Uncovery Calculator located on the RASP Tool Box web page, or by using the licensee values if available.

Step 4.4.5 – Fill-in the IEL determined in step 4.4.2 in each row of the lower section of the worksheet.

Step 4.4.6 – Determine the revised credit for each top event function impaired by the Finding.

A. Verify that the licensee has the **important** instrumentation referenced for the top event function.

NOTE: If the licensee does not have the referenced instrumentation available or the referenced instrumentation is not reflective of RCS conditions, then the default operator credit must be decreased by two.

B. To obtain the Equipment Credit, credit each available system that is (1) capable of maintaining the top event function and (2) is not impacted by the finding. Use the Event Tree associated with the Worksheet to help understand the successes and failures associated with each accident sequence. Use guidance in Tables 6 and 7 to determine equipment credits. Document key assumptions.

NOTE: Each top event has an equipment credit and an operator credit, only the equipment credit change or the operator credit change is propagated through the worksheets. See the following example:

Example: If the licensee has a finding that changes the FEED equipment credit from 5 to 3, then the revised credit for the FEED & BLEED FUNCTION becomes 3, regardless of the BLEED credit or the operator credit.

C. Determine the revised Operator Credit. Use the default operator credit listed in the worksheet unless any of the following four conditions are applicable.

1. If the referenced instrumentation is missing or misleading, then decrease the operator credit by two.
2. The default time is incorrect and significantly reduced. If the diagnoses time is less than 20 minutes OR the time to perform the action is approximately the time required, then decrease the operator credit by one.
3. If the action is complicated by missing or inaccessible equipment, steam or high radiation, or loop seals for venting pumps, then decrease the operator credit by two.
4. If the procedures are not complete for the shutdown plant configuration, then the operator credit is decreased by one.

Caution: It has been identified that it's possible for operator dominated sequences to have HEP values that are below levels recommended in the Risk Assessment of Operational Events (RASP) manuals Volumes 1 and 4 when following this procedure. Analysts should be cognizant of this potential and pay closer attention to operator action dominated sequences. If an analyst feels that this procedure is not adequately capturing the risk, they may depart from this procedure and perform a Phase 3 detailed risk assessment.

NOTE: If the default operator credit is changed and results in a negative operator credit, then the operator credit is zero.

Example: If the licensee has a finding that changes the operator credit from a 5 to a 3 due to a loss of instrumentation, then the revised credit for the FEED & BLEED FUNCTION becomes 3, regardless of the equipment FEED & BLEED equipment credit.

D. Determine the Credit for Function for each Top Event Function needed. Select the lower of Equipment Credit and Operator Credit and enter the value in **the Credit for Function** column.

Step 4.4.7 – Quantification of Core Damage Scenarios.

Quantify each accident scenario that is impacted by the finding adding the credits for IEL + Mitigation Credit. Enter the sum in the Result column.

NOTE: For phase 2 analyses, the recovery credit is not used.

Step 4.4.8 – Go to the next applicable worksheet and begin at step 1.4.1, or if all worksheets are completed, continue to step 1.4.9.

Step 4.4.9 – Estimating the Risk Significance of the Inspection Finding

The preliminary color of the finding is determined by using Table 9 – Counting Rule Worksheet.

Step 4.5 – Process for Assessing Events Under MD 8.3

Step 4.5.1 – Identify the TW and POS where the shutdown event occurred.

Step 4.5.2 – Identify the appropriate shutdown initiating event.

Use an **IEL = 0** if the event caused a loss **or** interruption of the RHR function.

OR

Determine the IEL. Evaluate each question in order. Only one of the following will apply:

- IF a finding increases the likelihood of a loss of level control (LOLC) or actually caused a LOLC, THEN LOLC is the applicable initiating event. Use Table 1 to determine the IEL. Go to Step 4.5.3.
- IF a finding increases the likelihood of a loss of offsite power (LOOP) or actually caused a LOOP, THEN LOOP is the applicable initiating event. Use Table 2 to determine the IEL. Go to Step 4.5.3.
- IF a finding increases the likelihood of a loss of reactor inventory (LOI) or actually caused a LOI, THEN LOI is the applicable initiating event. Use Table 3 to determine the IEL. Go to Step 4.5.3.
- IF a finding increases the likelihood of a loss of the operating train of RHR (LORHR) or actually caused a LORHR (except for LOOP and LOI), THEN LORHR is the applicable initiating event. Use Table 4 to determine the IEL. Go to Step 4.5.3.
- IF a finding involves the RHR support systems (except for LOOP and LOI), THEN LORHR is the applicable initiating event. Use Table 4 to determine the IEL. Go to Step 4.5.3.

Step 4.5.3 – Use the SDP worksheet that contains the POS and initiating event that were determined to be applicable in Step 4.5.1.

EXCEPTIONS:

- (1) For LOI POS 1 if RCS < 200F, use the POS 1 LOLC worksheets and event trees.
- (2) If failure of the cavity seal could occur following LOOP or SBO, use the LOOP POS 2 worksheet.

Step 4.5.4 – Enter the time to RCS boiling.

Enter the time to RCS boiling and an approximate time to core uncover/core damage in the first line of the worksheet.

Table 8 can be used to approximate a time to core damage from hot leg midplane conditions. Other tools exist as well, including an electronic Core Uncovery Calculator located on the RASP Tool Box web page, or by using licensee values if available.

Step 4.5.5 – Fill-in the IEL determined in step 4.5.2 in each row of the lower section of the worksheet.

Step 4.5.6 – Determine the revised Credit for Function for each top event function impacted by the finding for the as found condition during the event.

A. Verify the licensee has the **important** instrumentation referenced for the top event function.

NOTE: If the licensee does not have the referenced instrumentation available or the referenced instrumentation is not reflective of RCS conditions, then the default operator credit MUST be reduced by two.

B. To obtain the Equipment Credit, credit each available system that is (1) capable of maintaining the top event function and (2) is not impacted by the finding. Use the event tree associated with the Worksheet to help understand the successes and failures associated with each accident sequence. Use guidance in Tables 6 and 7 to determine equipment credits. Document key assumptions.

C. To obtain the Operator Credit, use the default operator credit unless any of the following four conditions are applicable:

1. If the referenced instrumentation is missing or misleading, then decrease the operator credit by two.
2. The default time is incorrect and significantly reduced. If the diagnoses time is less than 20 minutes OR the time to perform the action is approximately the time required, then decrease the operator credit by one.
3. If the action is complicated by missing or inaccessible equipment, steam or high radiation, or loop seals for venting pumps, then decrease the operator credit by two.
4. If the procedures are not directed for the shutdown configuration that the plant is in, then the operator credit is decreased by one.

NOTE: If the default operator credit is changed and results in a negative operator credit, then the operator credit is zero.

D. Determine the Credit for Function for each Top Event Function needed. Select the lower of Equipment Credit and Operator Credit and enter the value in the Credit for Function column.

Step 4.5.7 – Quantification of Core Damage Scenarios

Quantify each accident scenario by adding the credits for IEL + Mitigation Credit. Enter the sum in the Result column.

NOTE: For phase 2 analyses, the recovery credit is not used.

Step 4.5.8 – Go to the next applicable worksheet and begin at step 4.5.1, or if all worksheets are completed, continue to step 4.5.9.

Step 4.5.9 – Estimating the Risk Significance of the Inspection Finding

The preliminary color of the finding is determined by using Table 9 – Counting Rule Worksheet.

Figure 1 – Determination of Applicable POSs and Time Windows – PWRs

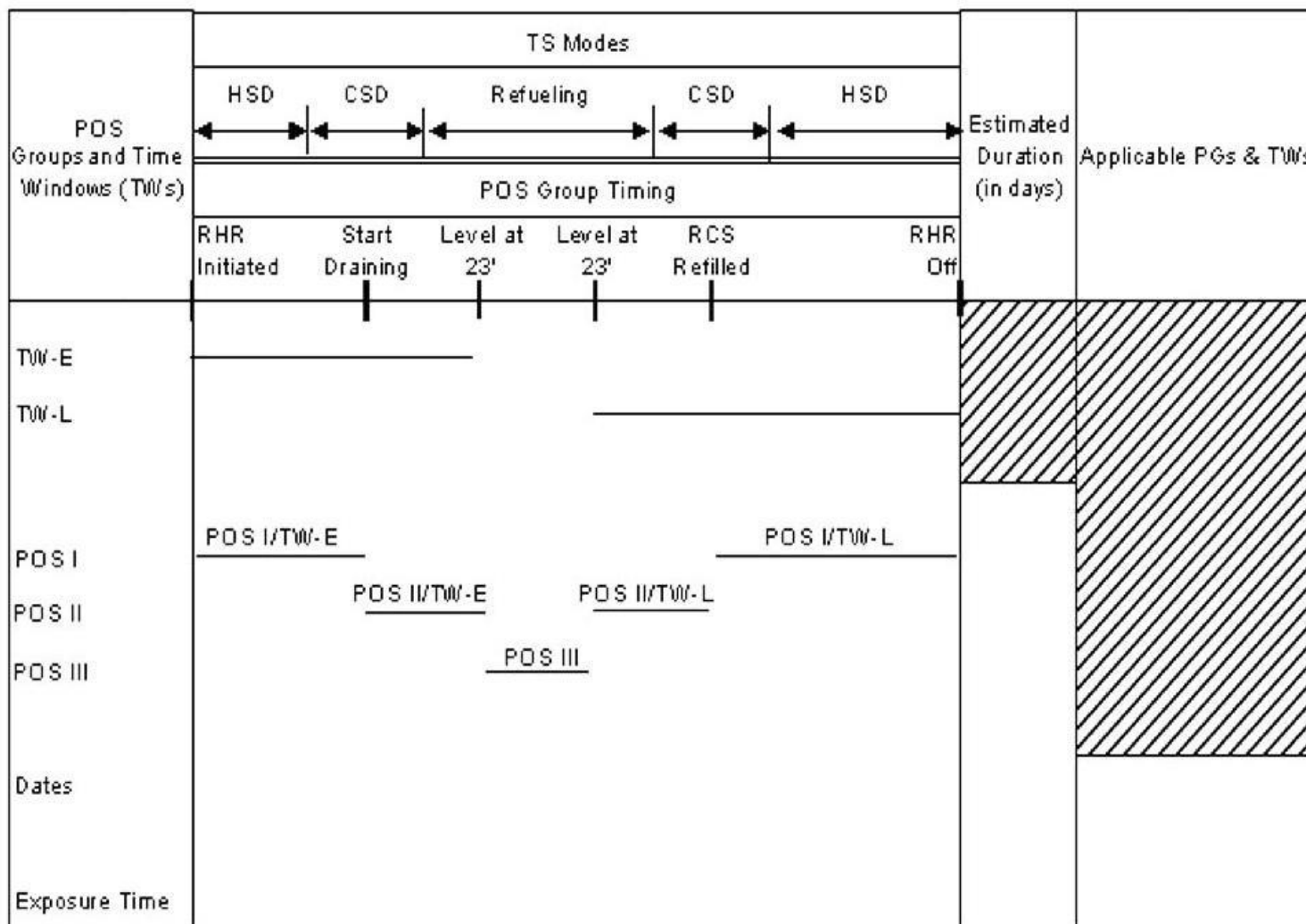


Table 1 – Initiating Event Likelihood (IELs) for LOLC Precursors

Time to RHR loss due to loss of RHR function due to loss of NPSH or vortexing assuming no successful operator action	Was RCS level indication reasonable reflection of RCS level ? AND Is DHR flow indication and DHR motor current available	Can action to recover RHR be identified within ½ time to RHR loss? E.g. Decrease RHR pump flow rate or increase RCS level	Can action to recover RHR be performed within ½ time to RHR loss?	Estimated IEL
LOLC occurred OR X<20 min.	N/A	N/A	N/A	0
20<x< 40 min.	YES	YES	YES	1
20<x< 40min.	NO	N/A	N/A	0
20<X <40min.	YES	NO	N/A	0
20<x< 40 min.	YES	YES	NO	0
40<x< 60 min.	YES	YES	YES	2
40<x< 60min.	NO	N/A	N/A	0
40<X <60min.	YES	NO	N/A	0
40<X<60 min.	YES	YES	NO	0
1HR<X<2HR	YES	YES	YES	3
1HR<X<2HR	NO	Yes	Yes	1
1HR<X<2HR	YES	NO	N/A	0
1HR<X<2HR	YES	Yes	NO	0
X>2HR	YES	YES	YES	4
X>2HR	NO	Yes	Yes	1
X> 2HR	YES	NO	N/A	0
X> 2 HR	YES	Yes	NO	0

Table 2 – Initiating Even Likelihoods (IELs) for LOOP Precursors

Type of LOOP precursor	Estimated Initiator Rating
Actual LOOP occurred	0
Work Activities have the potential to affect existing power supplies (example: crane operating close to a Reserve Auxiliary Transformer supplying power to RHR without adequate controls on its movement)	1

Table 3 – Initiating Event Likelihood (IELs) for Loss of Inventory (LOI) Precursors

Time to RHR loss due to loss of RHR pump suction Given no successful operator action (X = time to loss of RHR pump suction)	Was RCS Level indication a reasonable reflection of RCS level? AND Is DHR flow indication and DHR motor current available (LOLC events only)	Can leak path be readily identified within ½ time to loss of RHR	Can drain path be isolated by at least one functional valve such that a train of RHR can be re-started (e.g. not RHR suction valves)	Estimated IEL
LOI occurred X<20 min.	N/A	N/A	N/A	0
20<x< 40 min.	YES	YES	YES	1
20<x< 40min.	NO	N/A	N/A	0
20<X <40min.	YES	NO	N/A	0
20<x< 40 min.	YES	YES	NO	0
40<x< 60 min.	YES	YES	YES	2
40<x< 60min.	NO	N/A	N/A	0
40<X <60min.	YES	NO	N/A	0
40<X<60 min.	YES	YES	NO	0
1HR<X<2HR	YES	YES	YES	3
1HR<X<2HR	NO	YES	YES	1
1HR<X<2HR	YES	NO	N/A	0
1HR<X<2HR	YES	YES	NO	0
X>2HR	YES	YES	YES	4
X>2HR	NO	YES	YES	1
X> 2HR	YES	NO	N/A	0
X> 2 HR	YES	YES	NO	0

Table 4 – Initiating Event Likelihoods (IELs) for LORHR Precursors

Time to RHR loss given no successful operator action	Trouble alarms present for finding AND Core Exit Thermocouples (CETs) Ex. DHR high temp. DHR low flow Support System Trouble Alarms Ex. CCW low flow	Can action to recover RHR be identified within ½ time to RHR loss? (e.g., RHR recovery procedures, support system recovery procedures)	Can action to recover RHR be performed within ½ time to RHR loss?	Estimated IEL
LORHR occurred OR < 20 minutes	N/A	N/A	N/A	0
20 < X < 40 min.	Yes	Yes	Yes	1
20 < X < 40 min.	No	N/A	N/A	0
20 < X < 40 min.	Yes	No	N/A	0
20 < X < 40 min.	Yes	Yes	NO	0
40 < X < 60 min.	Yes	Yes	Yes	2
40 < X < 60 min.	No	N/A	N/A	0
40 < X < 60 min.	Yes	No	N/A	0
40 > X < 60 min.	Yes	Yes	NO	0
1 hr < X < 2 hr.	Yes	Yes	Yes	3
1 hr < X < 2 hr.	No	Yes	Yes	1
1 hr < X < 2 hr.	Yes	No	N/A	0
1 hr < X < 2 hr.	Yes	Yes	No	0
X > 2 hr	Yes	Yes	Yes	4
X > 2 hr	No	Yes	Yes	1
X > 2 hr	Yes	No	N/A	0
X > 2 hr	Yes	Yes	NO	0

Table 5 – Initiating Even Likelihoods (IELs) for Condition Findings – PWRs

Row	Approximate Conditional Frequency	Example Event Type	IEL		
			1	2	3
I	> 1 per 1-10 yr	Loss of offsite power (LOOP), Loss of RHR (LORHR)	1	2	3
II	1 per 10-10 ² yr	Loss of Inventory (LOI)	2	3	4
III	1 per 10-10 ² yr	Loss of Level Control (LOLC) ¹	2	2	2
			> 30 days	3-30 days	< 3 days
			Exposure Time for Degraded Condition		

LOLC is only applicable to POS group II.
LORHR and LOI are not applicable to POS group III.

¹Loss of level control failure is dominated by likelihood of overdraining to reach midloop conditions (this is a demand failure)

Table 6 - Mitigation Capability Credits for Installed Equipment

Type of Remaining Capability	Remaining Capability Rating
<p>Recovery of Failed Train</p> <p>Operator action to recover failed equipment that is capable of being recovered after an initiating event occurs. Action may take place either in the control room or outside the control room and is assumed to have a failure probability of approximately 0.1 when credited as "Remaining Mitigation Capability." Credit should be given only if the following criteria are satisfied: (1) sufficient time is available; (2) environmental conditions allow access, where needed; (3) procedures exist; (4) training is conducted on the existing procedures under similar conditions; and (5) any equipment needed to perform these actions is available and ready for use.</p>	1
<p>1 Automatic Steam-Driven (ASD) Train</p> <p>A collection of associated equipment that includes a single turbine-driven component to provide 100% of a specified safety function. The probability of such a train being unavailable due to failure, test, or maintenance is assumed to be approximately 0.1 when credited as "Remaining Mitigation Capability."</p>	1
<p>1 Train</p> <p>A collection of associated equipment (e.g., pumps, valves, breakers, etc.) that together can provide 100% of a specified safety function. The probability of this equipment being unavailable due to failure, test, or maintenance is approximately 1E-2 when credited as "Remaining Mitigation Capability."</p>	2
<p>1 Multi-Train System</p> <p>A system comprised of two or more trains (as defined above) that are considered susceptible to common cause failure modes. The probability of this equipment being unavailable due to failure, test, or maintenance is approximately 1E-3 when credited as "Remaining Mitigation Capability," regardless of how many trains comprise the system.</p>	3
<p>2 Diverse Trains</p> <p>A system comprised of two trains (as defined above) that are not considered to be susceptible to common cause failure modes. The probability of this equipment being unavailable due to failure, test, or maintenance is approximately 1E-4 when credited as "Remaining Mitigation Capability."</p>	4 = (2+2)

Table 7 - Credit for Temporary Equipment

Mitigation Capability	Credits
Equipment available during power operation and available during shutdown operation	Use credit similar to at-power SDP; manual alignment and actuation may be needed limiting the credit to the credit for operator action
Temporary Equipment (e.g., skid mounted diesel) that is available during shutdown; equipment and tools needed are staged for quick hookup	Use credit of 1

Table 8 - Definitions and Characterizations of Time Windows from Surry Shutdown PRA (NUREG/CR-6144 Table 5.4-20) assuming a vented RCS (RCS temperature initially 140F)

Time Post Shutdown	< 75 hrs	75 hrs < X <240 hrs	240 hrs <X < 32 days	32 days < X
Decay Heat	13MW (2 days)	10 MW (5 days)	7 MW (12 days)	5 MW (32 days)
Time to Boil (from midloop)	15 min.	20 min.	27 min.	37 min.
Time to Core Uncovery	120 min.	157 min.	209 min.	273 min.
Time to Core Damage	219 min.	297 min.	411 min.	557min.

Table 9 - Counting Rule Worksheet

Step	Instructions
(1)	Enter the number of sequences with a risk significance equal to 9. (1) _____
(2)	Divide the result of Step (1) by 3 and round down. (2) _____
(3)	Enter the number of sequences with a risk significance equal to 8. (3) _____
(4)	Add the result of Step (3) to the result of Step (2). (4) _____
(5)	Divide the result of Step (4) by 3 and round down. (5) _____
(6)	Enter the number of sequences with a risk significance equal to 7. (6) _____
(7)	Add the result of Step (6) to the result of Step (5). (7) _____
(8)	Divide the result of Step (7) by 3 and round down. (8) _____
(9)	Enter the number of sequences with a risk significance equal to 6. (9) _____
(10)	Add the result of Step (9) to the result of Step (8). (10) _____
(11)	Divide the result of Step (10) by 3 and round down. (11) _____
(12)	Enter the number of sequences with a risk significance equal to 5. (12) _____
(13)	Add the result of Step (12) to the result of Step (11). (13) _____
(14)	Divide the result of Step (13) by 3 and round down. (14) _____
(15)	Enter the number of sequences with a risk significance equal to 4. (15) _____
(16)	Add the result of Step (15) to the result of Step (14). (16) _____
<p>* If the result of Step 16 is greater than zero, then the risk significance of the inspection finding is of high safety significance (RED).</p> <p>* If the result of Step 13 is greater than zero, then the risk significance of the inspection finding is at least of substantial safety significance (YELLOW).</p> <p>* If the result of Step 10 is greater than zero, then the risk significance of the inspection finding is at least of low to moderate safety significance (WHITE).</p> <p>* If the result of Steps 10, 13, and 16 are zero, then the risk significance of the inspection finding is of very low safety significance (GREEN).</p> <p style="text-align: center;">Phase 2 Result: ~ GREEN ~ WHITE ~ YELLOW ~ RED</p>	

Worksheet 1. SDP for a PWR Plant - Loss Level Control in POS 1 (RCS Closed)

FILL IN: TIME TO BOILING _____ TIME TO CORE UNCOVERY _____ TIME TO CORE DAMAGE _____
 (NOTE: losses of inventory shorten time to core uncovery and core damage)

<u>Top Event Function:</u>	<u>Success Criteria and Important Instrumentation:</u>	<u>Equip. Credit</u>	<u>Operator Credit</u>	<u>Credit for Function</u>
SG Cooling (SG)	Operator maintains SG cooling by: (1) maintaining adequate level for 24 hours and (2) venting steam from SGs, and (3) keeping RCS closed. Operator needs SG level and pressure indication and CETs		Credit = 3 if supported by procedures and analyses	
RCS Injection And Bleed Before Core Damage (FEED& BLEED)	Operator initiates RCS injection before CD requires: 1 standby ECCS train or injection train capable of keeping core covered. Operator needs RCS level indication and CETs. AND Operator opens a RCS vent path (ex PORV) for RCS pressure control.,		Credit = 2, CD assumed >3 hrs w/o injection	
DHR Recovery Before RWST Depletion and CD (RHR-R)	Operator vents RHR pumps and restarts RHR before RWST depletion or Initiates an alternate DHR path other than FEED&BLEED. Operator needs RHR inlet/outlet temp indic. and RHR flow indic. w/low alarm		Credit = 3 time until RWST depletion assumed > 10 hrs	
Borated Water Makeup before CD (RWSTMU)	Operator initiates RWST makeup before RWST depletion and core damage. Operator needs RWST level indic. w/low level alarm NOTE: If the licensee has sufficient RWST inventory to last 24 hours, then this event is considered to be always successful.		Credit = 2, time to RWST depletion and CD > 13 hours	

Worksheet 1. SDP for a PWR Plant - Loss Level Control in POS 1 (RCS Closed) - Continued

Circle Affected Functions	IEL	Mitigation Credit	Recovery	Result
LOLC - SG - RHR-R - RWSTMU (4)				
LOLC - SG - FEED&BLEED (5)				
<p>Identify any operator recovery actions that are credited to directly restore the degraded equipment or initiating event:</p> <p>If operator actions are required to credit placing mitigation equipment in service or for recovery actions, such credit should be given only if the following criteria are met: 1) sufficient time is available to implement these actions, 2) environmental conditions allow access where needed, 3) procedures exist, 4) training is conducted on the existing procedures under conditions similar to the scenario assumed, and 5) any equipment needed to complete these actions is available and ready for use.</p>				

Worksheet 2. SDP for a PWR Plant - Loss Level Control in POS 2 (RCS Vented)

FILL IN: TIME TO BOILING _____ TIME TO CORE UNCOVERY _____ TIME TO CORE DAMAGE _____ (NOTE: losses of inventory shorten time to core uncover and core damage)				
<u>Top Event Function:</u>	<u>Success Criteria and Important Instrumentation:</u>	<u>Equip. Credit</u>	<u>Operator Credit</u>	<u>Credit for Function</u>
RCS injection before Core Damage (FEED)	Operator initiates RCS injection before CD requires: 1 standby ECCS train or injection train capable of keeping core covered Operator needs RCS level indication and CETs		Credit = 4 CD assumed >3 hrs w/o injection	
DHR Recovery Before RWST depletion and CD (RHR-R)	Operator vents RHR pumps, and restarts RHR before RWST depletion. Operator needs RHR inlet/outlet temp indic. and RHR flow indic. w/low alarm		Credit = 3 time to RWST depletion >10hrs	
Borated Water Makeup before CD (RWSTMU)	Operator initiates RWST makeup before RWST depletion and core damage. Operator needs RWST level indic w/ low level alarm NOTE: If the licensee has sufficient RWST inventory to last 24 hours, then this event is considered to be always successful.		Credit = 2 time to RWST depletion and CD > 13 hours	

Worksheet 2. SDP for a PWR Plant - Loss Level Control in POS 2 (RCS Vented) – Continued

<u>Circle Affected Functions</u>	<u>IEL</u>	<u>Mitigation Credit</u>	<u>Recovery</u>	<u>Result</u>
LOI – RHR-R-RWSTMU (3)				
LOI – FEED (4)				
<p>Identify any operator recovery actions that are credited to directly restore the degraded equipment or initiating event:</p> <p>If operator actions are required to credit placing mitigation equipment in service or for recovery actions, such credit should be given only if the following criteria are met: 1) sufficient time is available to implement these actions, 2) environmental conditions allow access where needed, 3) procedures exist, 4) training is conducted on the existing procedures under conditions similar to the scenario assumed, and 5) any equipment needed to complete these actions is available and ready for use.</p>				

Notes: Failure to recover RHR before RWST depletion is assumed to fail recirculation from the sump since the RHR pumps are also used to perform the recirculation function. Recovery of RHR does not guarantee available recirculation since the sump may be unavailable due to trash.

Worksheet 3. SDP for a PWR Plant - Loss of Offsite Power in POS 1 (RCS Closed)

FILL IN: TIME TO BOILING _____ TIME TO CORE UNCOVERY _____ TIME TO CORE DAMAGE _____ (NOTE: losses of inventory shorten time to core uncover and core damage)				
<u>Top Event Function:</u>	<u>Success Criteria and Important Instrumentation:</u>	<u>Equip. Credit</u>	<u>Operator Credit</u>	<u>Credit for Function</u>
Emergency AC starts and loads (EAC)	One EDG or alternate onsite AC source ¹			
SG Cooling (SGSBO)	Operator maintains SG cooling by: (1) maintaining adequate level for 24 hours and (2) venting steam from SGs, and (3) keeping RCS closed. Operator needs SG level and SG pressure indication and CETs		Credit = 3 if supported by procedures and analyses	
Operator recovers offsite power before CD (RLOOP3)	Recovery of offsite power before core damage given SGSBO failed	Credit = 1 (assumes CD = 3 hours)	N/A	

¹Alternate onsite AC source can be credited if it can be tied in to the 4KV buses at least 1 hour before RHR pump shutoff head is reached. Onsite AC sources also include the Keowee Hydro Units and the Lee Combustion Gas Turbines at Oconee.

Worksheet 3. SDP for a PWR Plant - Loss of Offsite Power in POS 1 (RCS Closed) - Continued

Circle Affected Functions	IEL	Mitigation Credit	Recovery	Results
LOOP-EAC-SGSBO-RLOOP3 (3)				
<p data-bbox="233 477 1734 508">Identify any operator recovery actions that are credited to directly restore the degraded equipment or initiating event:</p> <p data-bbox="233 711 1808 870">If operator actions are required to credit placing mitigation equipment in service or for recovery actions, such credit should be given only if the following criteria are met: 1) sufficient time is available to implement these actions, 2) environmental conditions allow access where needed, 3) procedures exist, 4) training is conducted on the existing procedures under conditions similar to the scenario assumed, and 5) any equipment needed to complete these actions is available and ready for use.</p>				

Worksheet 4. SDP for a PWR Plant - Loss of Offsite Power in POS 2 (RCS Vented)

FILL IN: TIME TO BOILING _____ TIME TO CORE UNCOVERY _____ TIME TO CORE DAMAGE _____ (NOTE: losses of inventory shorten time to core uncover and core damage)				
<u>Top Event Function:</u>	<u>Success Criteria and Important Instrumentation:</u>	<u>Equip. Credit</u>	<u>Operator Credit</u>	<u>Credit for Function</u>
Emergency AC starts and loads (EAC)	One EDG or alternate onsite AC source ¹			
Gravity Feed (GRAVITY) before CD	Operator initiates Gravity Feed assuming SBO before core damage. Requires an available flow path, procedures, supporting analyses, and CETs. Gravity feeding to the RCS may be credited if Gravity Feed is expected to be available AFTER RCS boiling initiates. To credit Gravity Feed, the analyst needs to consider the following factors that can negate the elevation head provided by the RWST or other sources of RCS inventory: (1) pressure drops in the surge line (2) entrained water accumulating in the pressurizer (3) RCS vent paths that are restricted (to control loose parts or control off gassing) .		Credit = 3	

¹Alternate onsite AC source can be credited if it can be tied in to the 4KV buses at minimum 1 hour before core damage. Onsite AC sources also include the Keowee Hydro Units and the Lee Combustion Gas Turbines at Oconee.

Worksheet 4. SDP for a PWR Plant - Loss of Offsite Power in POS 2 (RCS Vented) – Continued

Operator recovers offsite power before CD (RLOOP4)	Recovery of offsite power before core damage given unsuccessful gravity feed (CD assumed at 4 hours)	Credit = 1	N/A	
Operator recovers offsite power before CD (RLOOP18)	Recovery of offsite power before core damage given successful gravity feed (CD assumed at 18 hours)	Credit = 2	N/A	

<u>Circle Affected Functions</u>	<u>IEL</u>	<u>Remaining Mitigation Capability Rating for Each Affected Sequence</u>	<u>Recovery</u>	<u>Result</u>
LOOP-EAC-RLOOP18 (3)				
LOOP-EAC-GRAVITY-RLOOP4 (5)				

Identify any operator recovery actions that are credited to directly restore the degraded equipment or initiating event:

If operator actions are required to credit placing mitigation equipment in service or for recovery actions, such credit should be given only if the following criteria are met: 1) sufficient time is available to implement these actions, 2) environmental conditions allow access where needed, 3) procedures exist, 4) training is conducted on the existing procedures under conditions similar to the scenario assumed, and 5) any equipment needed to complete these actions is available and ready for use.

Worksheet 5. SDP for a PWR Plant - Loss of Inventory in POS I (RCS Closed)

FILL IN: TIME TO BOILING _____ TIME TO CORE UNCOVERY _____ TIME TO CORE DAMAGE _____

(NOTE: losses of inventory shorten time to core uncover and core damage)

<u>Top Event Function:</u>	<u>Success Criteria and Important Instrumentation:</u>	<u>Equip. Credit</u>	<u>Operator Credit</u>	<u>Credit for Function</u>
RCS injection (FEED)	Operator initiates RCS injection before CD requires: 1standby ECCS train or injection train capable of keeping core covered Operator needs RCS level indic and CETs,		Credit = 4, CD assumed >3 hrs w/o injection	
Leak Path Terminated before RWST depletion (LEAK-STOP)	Operator isolates leak before RWST depletion, requires: one available valve such that RHR can be restarted (not RHR isolation valves) Operator needs RCS level indic.	Credit = 3 for one valve Credit = 4 for two valves	Credit = 3 (assumed >10 hrs to RWST depletion)	
Leak Path Terminated before core uncover given no FEED (LEAK-STOP2)	Operator isolates leak before core uncover, requires: one available valve such that RHR can be restarted (not RHR isolation valves), Operator needs RCS level indic.	Credit = 3 for one valve Credit = 4 for two valves	Credit = 2	
SG Cooling (SG)	Operator maintains SG cooling by: (1) maintaining adequate level for 24 hours, (2) venting steam from SGS, and (3) keeping the RCS closed. Operator needs SG level and SG pressure indic. and CETs		Credit = 3, if supported by procedures and analyses	

Worksheet 5. SDP for a PWR Plant - Loss of Inventory in POS I (RCS Closed) - Continued

<u>Top Event Function:</u>	<u>Success Criteria and Important Instrumentation:</u>	<u>Equip. Credit</u>	<u>Operator Credit</u>	<u>Credit for Function</u>
RCS Vent path for Feed and Bleed (BLEED)	Operator opens a PORV or vent path large enough to remove decay heat		Credit = 4	
DHR recovery before RWST depletion and CD (RHR-R)	Operator vents RHR pumps and restarts RHR before RWST depletion. Operator needs RHR inlet/outlet temp indic. and RHR flow indic. w/low alarm		Credit = 3 (assumed time until RWST depletion > 10 hrs)	
Borated Water Makeup before CD(RWSTMU)	Operator initiates RWST makeup before RWST depletion and core damage. Operator needs RWST level indication with low level alarm NOTE: If the licensee has sufficient RWST inventory to last 24 hours, then this event is considered to be always successful.		Credit = 2 time to RWST depletion and CD > 13 hours	

Worksheet 5. SDP for a PWR Plant - Loss of Inventory in POS I (RCS Closed) - Continued

<u>Circle Affected Functions</u>	<u>IEL</u>	<u>Mitigation Credit</u>	<u>Recovery</u>	<u>Result</u>
LOI - SG - RHR-R - RWSTMU (4)				
LOI-SG-BLEED (5)				
LOI- LEAKSTOP-RWSTMU (7)				
LOI - FEED - SG - (9)				
LOI - FEED - LEAKSTOP2 (10)				
<p>Identify any operator recovery actions that are credited to directly restore the degraded equipment or initiating event:</p> <p>If operator actions are required to credit placing mitigation equipment in service or for recovery actions, such credit should be given only if the following criteria are met: 1) sufficient time is available to implement these actions, 2) environmental conditions allow access where needed, 3) procedures exist, 4) training is conducted on the existing procedures under conditions similar to the scenario assumed, and 5) any equipment needed to complete these actions is available and ready for use.</p>				

Notes: Failure to recover RHR before RWST depletion is assumed to fail recirculation from the sump since the RHR pumps are also used to perform the recirculation function. Recovery of RHR does not guarantee available recirculation since the sump may be unavailable due to trash.

Worksheet 6. SDP for a PWR Plant - Loss of Inventory in POS 2 (RCS Vented)

FILL IN: TIME TO BOILING _____ TIME TO CORE UNCOVERY _____ TIME TO CORE DAMAGE _____ (NOTE: losses of inventory shorten time to core uncover and core damage)				
<u>Top Event Function:</u>	<u>Success Criteria and Important Instrumentation:</u>	<u>Equip. Credit</u>	<u>Operator Credit</u>	<u>Credit for Function</u>
RCS injection before CD (FEED)	Operator initiates RCS injection before CD requires: 1standby ECCS train or injection train capable of keeping core covered Operator needs RCS level indication and CETs.		Credit = 4, CD assumed >3 hrs w/o injection	
Leak Path Terminated before RWST depletion (LEAK-STOP) ²	Operator isolates leak before RWST depletion, requires: one available valve such that RHR can be restarted (not RHR isolation valves) Operator needs RCS level indication.	Credit = 3 for one valve Credit = 4 for two valves	Credit = 3 (assumed >10 hrs to depletion)	
DHR recovery before RWST depletion and CD (RHR-R)	Operator vents RHR pumps and restarts RHR before RWST depletion. Operator needs RHR inlet/outlet temp indic. and RHR flow indic. w/low alarm		Credit = 3 time to RWST depletion >10hrs	

²If leak path is back to the RWST, then use operator credit = 5 to account that RWST will not deplete but will heat up without cooling.

Worksheet 6. SDP for a PWR Plant - Loss of Inventory in POS 2 (RCS Vented) - Continued

Borated Water Makeup before CD (RWSTMU)	Operator initiates RWST makeup before RWST depletion and core damage. Operator needs RWST level indication with low level alarm NOTE: If the licensee has sufficient RWST inventory to last 24 hours, then this event is considered to be always successful.		Credit = 2 time to RWST depletion and CD > 13 hours	
---	--	--	---	--

<u>Circle Affected Functions</u>	<u>IEL</u>	<u>Mitigation Credit</u>	<u>Recovery</u>	<u>Result</u>
LOI - RHR-R-RWSTMU (3)				
LOI- LEAK-ST-RWSTMU (5)				
LOI -FEED (6)				
<p>Identify any operator recovery actions that are credited to directly restore the degraded equipment or initiating event:</p> <p>If operator actions are required to credit placing mitigation equipment in service or for recovery actions, such credit should be given only if the following criteria are met: 1) sufficient time is available to implement these actions, 2) environmental conditions allow access where needed, 3) procedures exist, 4) training is conducted on the existing procedures under conditions similar to the scenario assumed, and 5) any equipment needed to complete these actions is available and ready for use.</p>				

Notes: Failure to recover RHR before RWST depletion is assumed to fail recirculation from the sump since the RHR pumps are also used to perform the recirculation function. Recovery of RHR does not guarantee available recirculation since the sump may be unavailable due to trash.

Worksheet 7. SDP for a PWR Plant - Loss of Inventory in POS 3 (Cavity Flooded)

FILL IN: TIME TO BOILING _____ TIME TO CORE UNCOVERY _____ TIME TO CORE DAMAGE _____ (NOTE: losses of inventory shorten time to core uncover and core damage)				
<u>Top Event Function</u>	<u>Success Criteria and Important Instrumentation:</u>	<u>Equip. Credit</u>	<u>Operator Credit</u>	<u>Credit for Function</u>
RCS injection before CD (FEED)	Operator initiates recirculation RCS injection before CD requires: 1 train of recirculation capable of keeping core covered. Verify that sump screens are not blocked by covers or outage debris. Operator needs RCS level indic.		Credit = 4, CD assumed >3 hrs w/o injection	
Leak terminated before RCS injection cannot be sustained and CD occurs (LEAK-STOP)	Operator isolates drain path using at least one functional valve such that RHR can be restarted.	Credit = 3 for one valve Credit = 4 for two valves	Credit = 3 time to CD assumed > 4 hours	
DHR recovery before RCS injection cannot be sustained and CD results (RHR-R)	Operator vents RHR pumps and restarts RHR system. Operator needs RHR inlet/outlet temp and RHR flow indic. w/low alarm.		Credit = 3 time to CD assumed > 4 hours	

Worksheet 7. SDP for a PWR Plant - Loss of Inventory in POS 3 (Cavity Flooded)

Circle Affected Functions	IEL	Mitigation Credit	Recovery	Sequence Color
LOI - RHR-R- (2)				
LOI - LEAK-STOP (3)				
LOI -FEED (4)				
<p>Identify any operator recovery actions that are credited to directly restore the degraded equipment or initiating event:</p> <p>If operator actions are required to credit placing mitigation equipment in service or for recovery actions, such credit should be given only if the following criteria are met: 1) sufficient time is available to implement these actions, 2) environmental conditions allow access where needed, 3) procedures exist, 4) training is conducted on the existing procedures under conditions similar to the scenario assumed, and 5) any equipment needed to complete these actions is available and ready for use.</p>				

Worksheet 8. SDP for a Westinghouse 4-Loop Plant - Loss of RHR in POS I (RCS Closed)

FILL IN: TIME TO BOILING _____ TIME TO CORE UNCOVERY _____ TIME TO CORE DAMAGE _____ (NOTE: losses of inventory shorten time to core uncover and core damage)				
<u>Top Event Function:</u>	<u>Success Criteria and Important Instrumentation:</u>	<u>Equip. Credit¹</u>	<u>Operator Credit²</u>	<u>Credit for Function</u>
DHR recovery before RCS boiling (RHR-S)	<p>Operator a train of RHR before RCS boiling.</p> <p>Operator needs RHR inlet/outlet temp indic. and RHR flow indic. w/low alarm</p> <p>AND IF APPLICABLE³</p> <p>Operator recovers failed RHR support systems before RCS boiling (SEE FOOT NOTE 3)</p>		<p>Credit = 0 if TBB <20 minutes</p> <p>IF RHR recovery action can be identified within ½ TBB AND RHR recovery action can be performed within ½ TBB AND Trouble alarms are available.</p> <p>THEN</p> <p>CREDIT = 1 if 20 min. < TBB < 40 min. CREDIT = 2 if 40 min. <TBB < 1 hour CREDIT = 3 if TBB > 1 hour</p>	

¹If **finding** is being transferred from LOOP tree, analyst must consider if the front line systems and necessary support systems are supported from successful EAC.

²For the safety function RHR-S, when being transferred from LOOP tree, if TBB < 10 minutes and re-start of RHR requires operator action outside the control room, then operator credit = 0. Otherwise, operator credit = 1.

³If this worksheet is being used to assess a RHR support system deficiency that could cause a loss of the operating train of RHR, then the equipment credit and operator credit is determined by the operator's ability to recover the support system before RCS boiling.

Worksheet 8. SDP for a Westinghouse 4-Loop Plant - Loss of RHR in POS I (RCS Closed) – Continued

<u>Top Event Function:</u>	<u>Success Criteria and Important Instrumentation:</u>	<u>Equip. Credit¹</u>	<u>Operator Credit²</u>	<u>Credit for Function</u>
SG Cooling (SG)	Operator maintains SG cooling by: (1) maintaining adequate level for 24 hours, (2) venting steam from SGS, and (3) keeping the RCS closed. Operator needs SG level and pressure indic. and CETs		Credit = 3, if supported by procedures and analyses	
RCS Injection AND Bleed Before Core Damage (FEED&BLEED)	Operator initiates RCS injection before CD requires: 1standby ECCS train or injection train capable of keeping core covered Operator needs RCS level indic. and CETs, AND Operator also opens an RCS vent path (ex PORV) to control RCS pressure		Credit = 2, CD assumed >3 hrs w/o injection	
DHR recovery before RWST depletion and CD (RHR-R)	Operator vents RHR pumps and restarts RHR before RWST depletion. Operator needs RHR inlet/outlet temp indic. and RHR flow indic. w/low alarm	Consider Equip. Failures in RHR-S that could impact this equip. credit	Credit = 2 time until RWST depletion > 10 hrs.	

¹If **finding** is being transferred from LOOP tree, analyst must consider if the front line systems and necessary support systems are supported from successful EAC.

²For the safety function RHR-S, when being transferred from LOOP tree, if TBB < 10 minutes and re-start of RHR requires operator action outside the control room, then operator credit = 0. Otherwise, operator credit = 1.

<u>Top Event Function:</u>	<u>Success Criteria and Important Instrumentation:</u>	<u>Equip. Credit¹</u>	<u>Operator Credit²</u>	<u>Credit for Function</u>
Borated Water Makeup before CD(RWSTMU)	Operator initiates RWST makeup before RWST depletion and core damage. Operator needs RWST level indication with low level alarm NOTE: If the licensee has sufficient RWST inventory to last 24 hours, then this event is considered to be always successful.		Credit = 2 time to RWST depletion and CD > 16 hours	

<u>Circle Affected Functions</u>	<u>IEL</u>	<u>Mitigation Credit</u>	<u>Recovery</u>	<u>Result</u>
LORHR - RHR-S - SG - RHR-R- RWSTMU (5)				
LORHR - RHR-S - SG - FEED&BLEED (6)				

Identify any operator recovery actions that are credited to directly restore the degraded equipment or initiating event:

If operator actions are required to credit placing mitigation equipment in service or for recovery actions, such credit should be given only if the following criteria are met: 1) sufficient time is available to implement these actions, 2) environmental conditions allow access where needed, 3) procedures exist, 4) training is conducted on the existing procedures under conditions similar to the scenario assumed, and 5) any equipment needed to complete these actions is available and ready for use.

Notes: Failure to recover RHR before RWST depletion is assumed to fail recirculation from the sump since the RHR pumps are also used to perform the recirculation function. Recovery of RHR does not guarantee available recirculation since the sump may be unavailable due to trash.

Worksheet 9. SDP for a Westinghouse 4-Loop Plant - Loss of RHR in POS 2 (RCS Vented)

FILL IN: TIME TO BOILING _____ TIME TO CORE UNCOVERY _____ TIME TO CORE DAMAGE _____ (NOTE: losses of inventory shorten time to core uncover and core damage)				
<u>Top Event Function:</u>	<u>Success Criteria and Important Instrumentation:</u>	<u>Equip. Credit</u> ¹	<u>Operator Credit</u> ²	<u>Credit for Function</u>
DHR recovery before RCS boiling (RHR-S) OR DHR recovery before RCS boils to Flange Level if Vessel Head is Removed.	Operator a train of RHR. Operator needs RHR inlet/outlet temp indic. and RHR flow indic. w/low alarm AND IF APPLICABLE ³ Operator recovers failed RHR support systems before RCS boiling (See footnote 3)		Credit = 0 if TBB <20 minutes IF RHR recovery action can be identified within ½ Time to Boil AND RHR recovery action can be performed within ½ TBB AND Trouble alarms are available. THEN CREDIT = 1 if 20 min. < TBB < 40 min. CREDIT = 2 if 40 min. <TBB < 1 hour CREDIT = 3 if TBB> 1 hour	

¹If **finding** is being transferred from LOOP tree, analyst must consider if the front line systems and necessary support systems are supported from successful EAC.

²For the safety function, RHR-S, when being transferred from LOOP tree, if TBB < 10 minute and re-start of RHR requires operator action outside the control room, then operator credit = 0. Otherwise, operator credit = 1.

³If this worksheet is being used to assess a RHR support system deficiency that could cause a loss of the operating train of RHR, then the equipment credit and operator credit is determined by the operator's ability to recover the support system before RCS boiling.

Worksheet 9. SDP for a Westinghouse 4-Loop Plant - Loss of RHR in POS 2 (RCS Vented) – Continued

<u>Top Event Function:</u>	<u>Success Criteria and Important Instrumentation:</u>	<u>Equip. Credit</u> ¹	<u>Operator Credit</u> ²	<u>Credit for Function</u>
RCS injection before CD	Operator initiates RCS injection before CD requires: 1standby ECCS train or injection train capable of keeping core covered, RCS level indic., CETs,		Credit = 4, CD assumed >3 hrs w/o injection	
DHR recovery before RWST depletion (RHR-R)	Operator fills RCS, vents RHR pumps, and restarts RHR before RWST depletion, requires: CET w/hi alarm, RHR inlet/outlet temp indic., RHR flow indic. w/low alarm	Consider Equip. Failures in RHR-S that could impact this equip. credit	Credit = 2 time to RWST depletion >10hrs	
Borated Water Makeup before CD(RWSTMU)	Operator initiates RWST makeup before RWST depletion with boric acid transfer pumps and primary grade water, Operator needs RWST level indic and low-level alarm NOTE: If the licensee has sufficient RWST inventory to last 24 hours, then this event is considered to be always successful.		Credit = 2 time to RWST and CD assumed > 13 hours	

Worksheet 9. SDP for a Westinghouse 4-Loop Plant - Loss of RHR in POS 2 (RCS Vented) – Continued

Circle Affected Functions	IEL	Mitigation Credit	Recovery	Result
LORHR - RHR-S - RHR-R - RWSTMU (4)				
LORHR - RHR-S - FEED (5)				

Identify any operator recovery actions that are credited to directly restore the degraded equipment or initiating event:

If operator actions are required to credit placing mitigation equipment in service or for recovery actions, such credit should be given only if the following criteria are met: 1) sufficient time is available to implement these actions, 2) environmental conditions allow access where needed, 3) procedures exist, 4) training is conducted on the existing procedures under conditions similar to the scenario assumed, and 5) any equipment needed to complete these actions is available and ready for use.

Notes: Failure to recover RHR before RWST depletion is assumed to fail recirculation from the sump since the RHR pumps are also used to perform the recirculation function. Recovery of RHR does not guarantee available recirculation since the sump may be unavailable due to trash.

Figure 2 – Event Tree for Loss of Inventory – PWR POS – 1

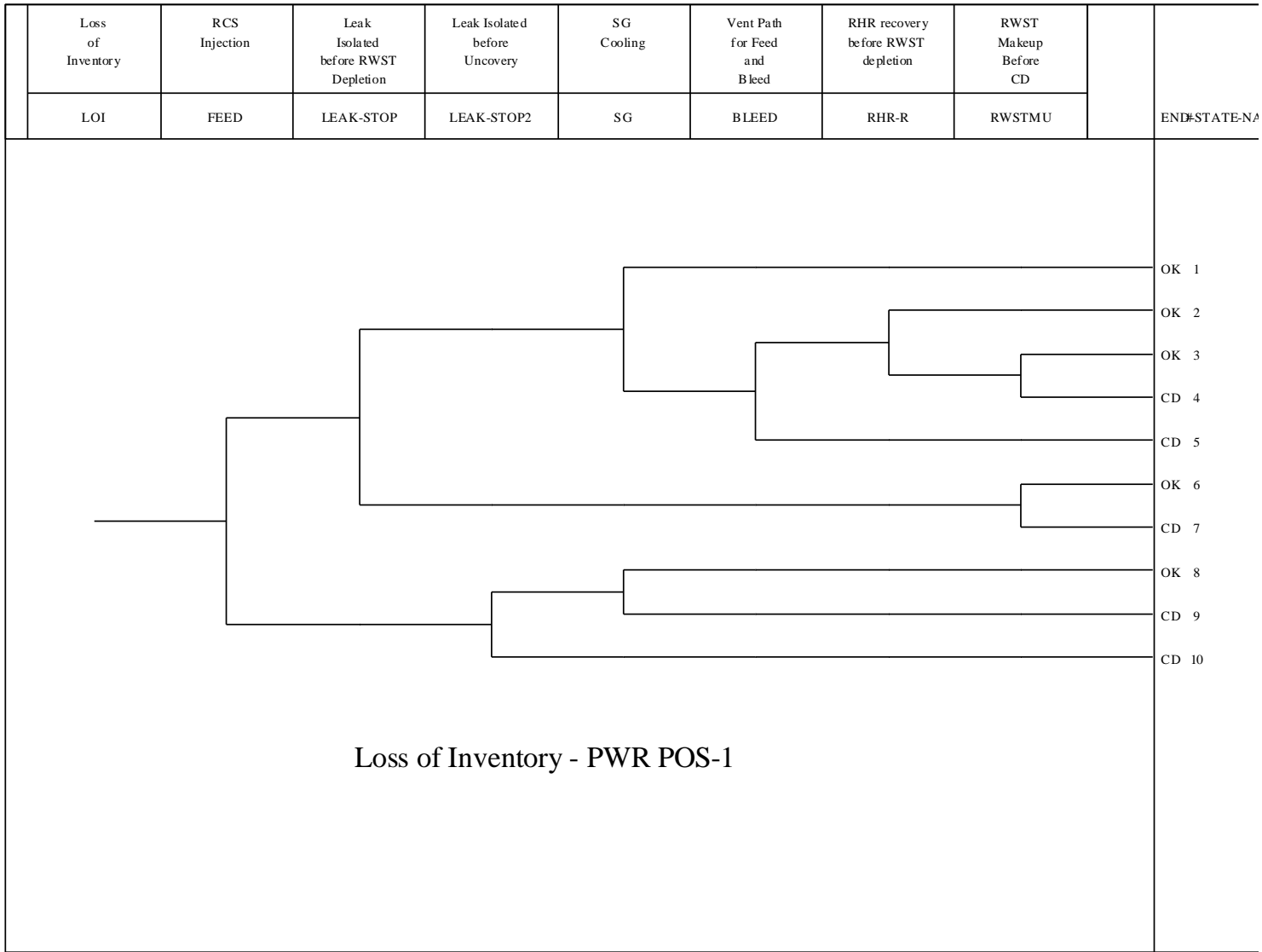


Figure 3 – Event Tree for Loss of Inventory – PWR POS – 2

Loss of Inventory	RCS Injection before CD	Terminated before RWST Depletion	RHR Recovery before RWST Depletion	RWST Makeup Before CD	#	END-STATE-NAME
LOI	FEED	LEAK-STOP	RHR-R	RWSTMU		
					1	OK
					2	OK
					3	CD
					4	OK
					5	CD
					6	CD
<p>Loss of Inventory - PWR POS-2</p>						

Figure 4 – Event Tree for Loss of Inventory PWR POS - 3

Loss of Inventory	RCS Injection Before CD	Terminated before RCS and makeup Depletion	RHR recovery before water inventory depleted		
LOI	FEED	LEAK-STOP	RHR-R	#	END-STATE-NAMES
				1	OK
				2	CD
				3	CD
				4	CD
<p>Loss of Inventory - PWR POS-3</p>					

Figure 5 - Event Tree for Loss of Level Control - PWR POS - 1

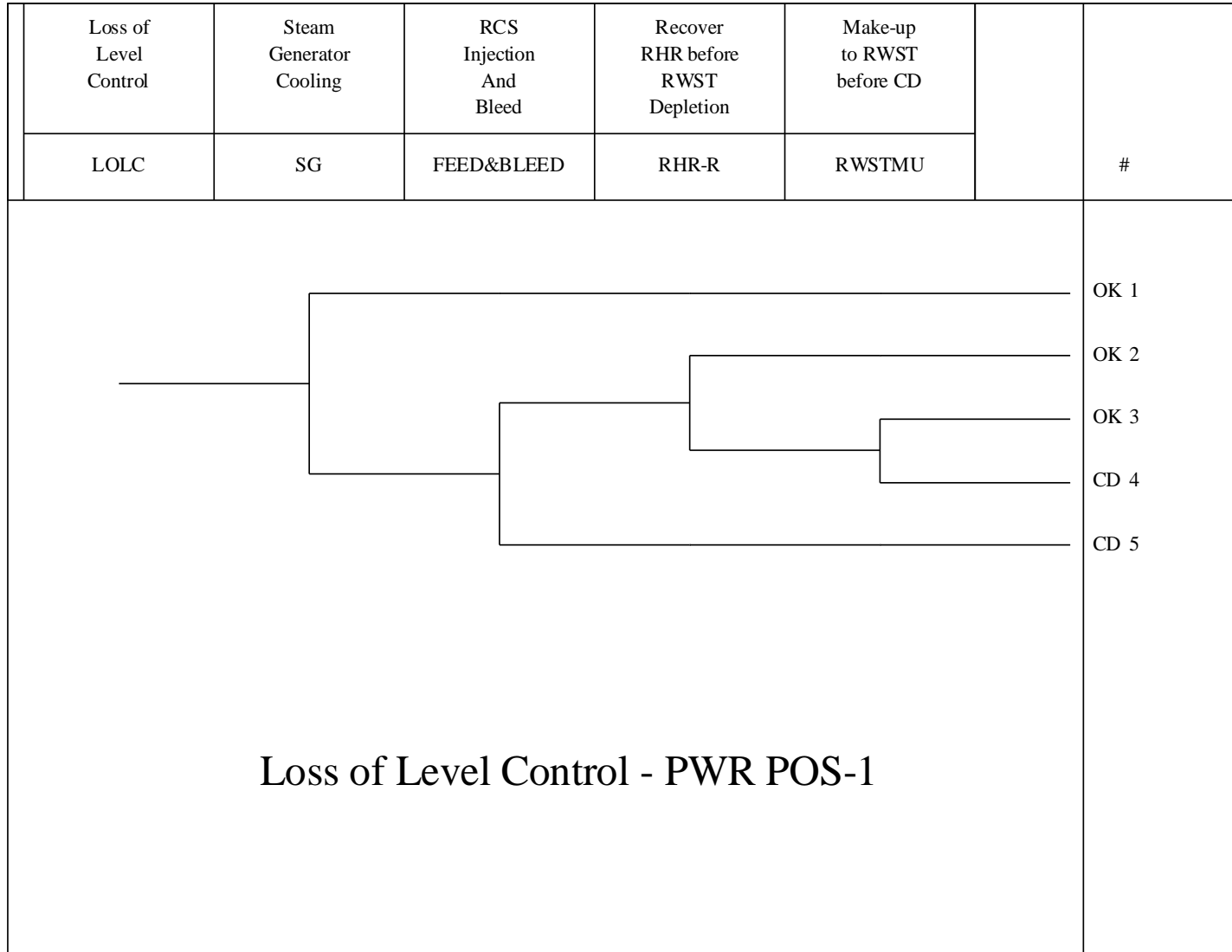


Figure 6 – Event Tree for Loss of Level Control – POS – 2

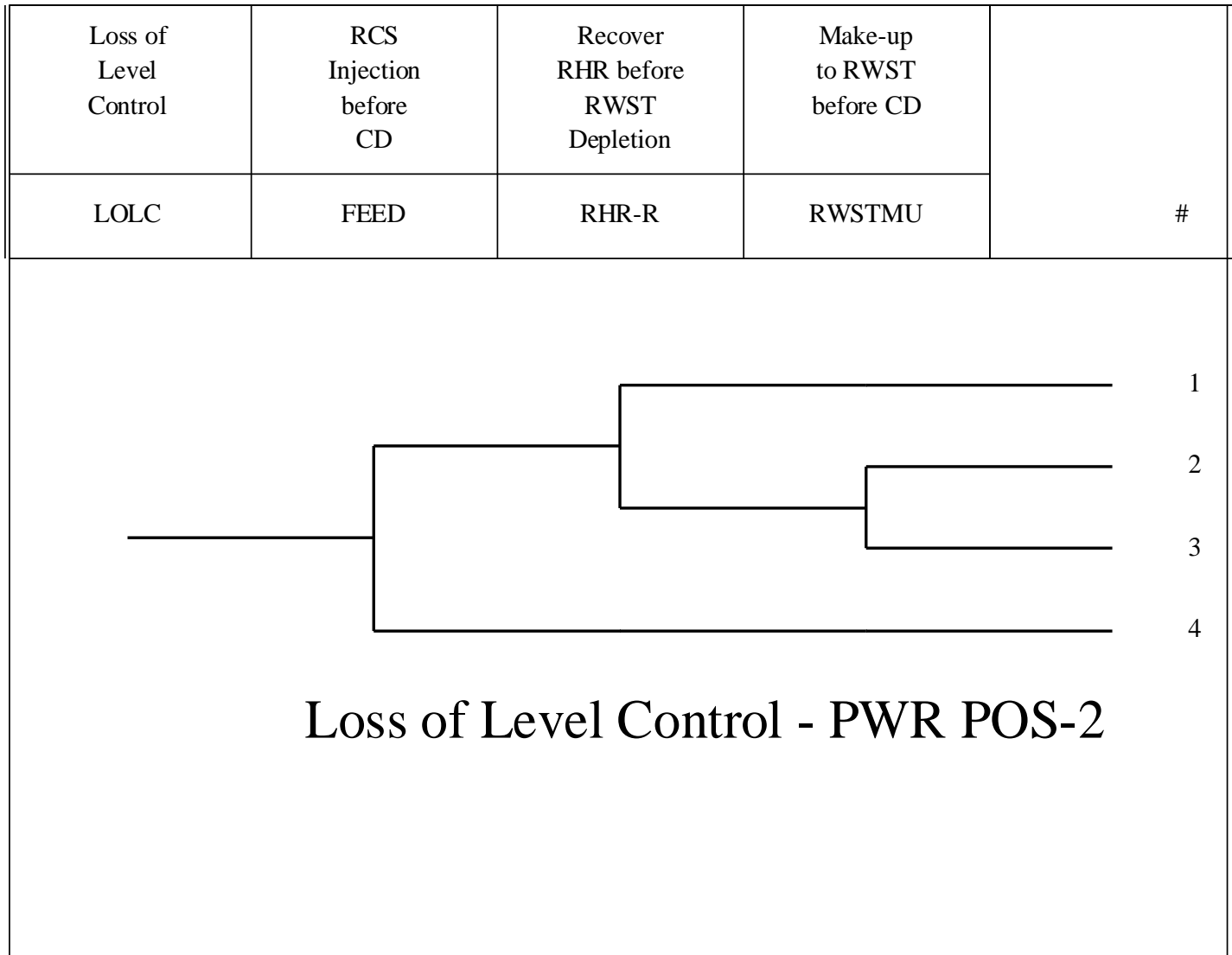


Figure 7 – Event Tree for Loss of Offsite Power – PWR POS – 1

Loss of Offsite Power	AC Power	SG Cooling Maintained	Recovery of Power within 3 hours (before CD)		
LOOP	EAC	SGSBO	RLOOP3	#	END-STATE-NAMES
<p align="center">Loss of Offsite Power - PWR POS-1</p>					<p>1 LORHR</p> <p>2 OK</p> <p>3 OK</p> <p>4 CD</p>

Figure 8 – Event Tree for Loss of Offsite Power – PWR POS-2

Loss of Offsite Power	AC Power	Gravity Feed before CD	Recovery of Power (EDG or Offsite) 4 hours	Recovery of Power (EDG or Offsite) 18 hours		
LOOP	EAC	GRAVITY	RLOOP4	RLOOP18	#	END-STATE-NAMES
<p>Loss of Offsite Power - PWR POS-2</p>						

Figure 9 – Event Tree for Loss of RHR – PWR POS-1

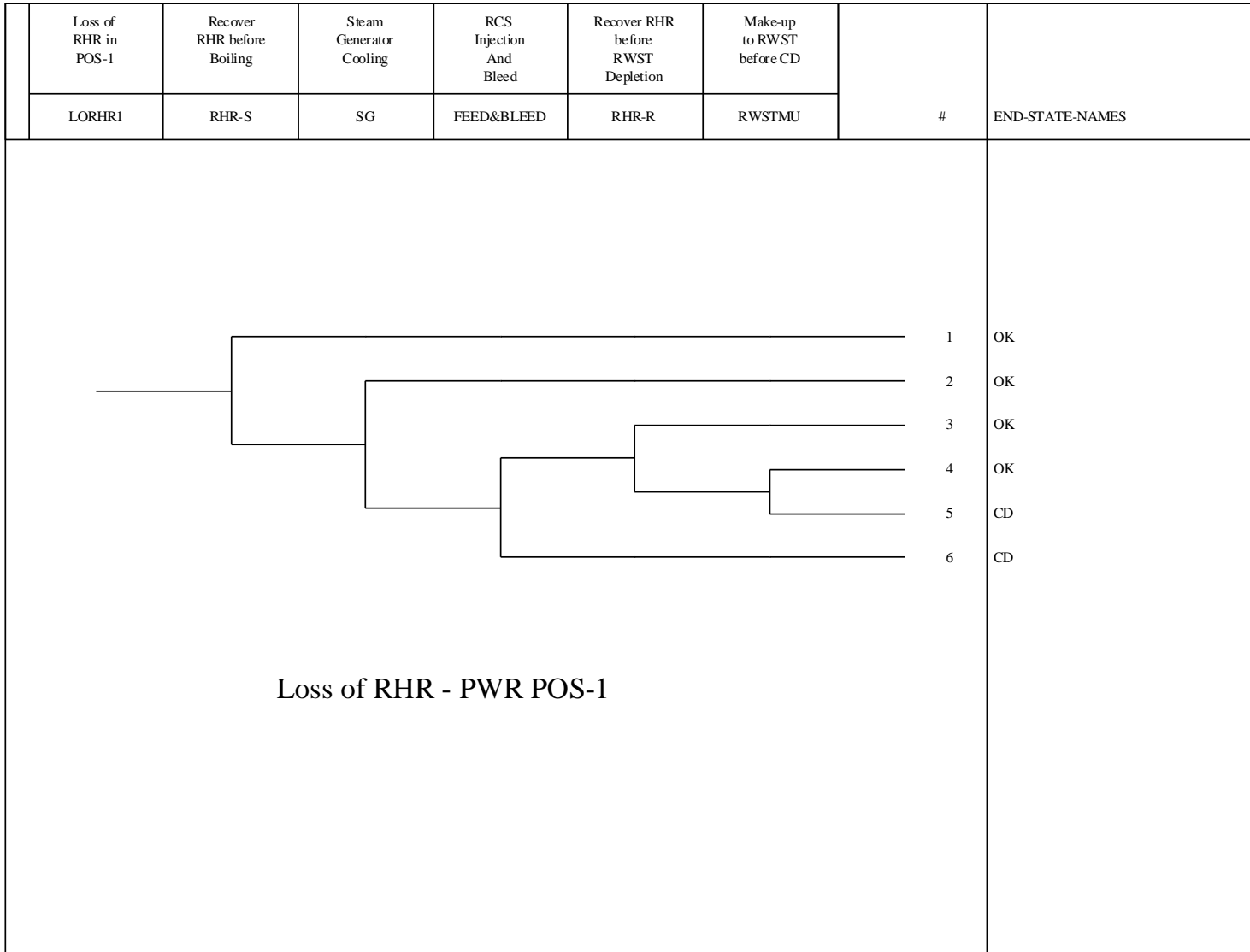


Figure 10 - Event Tree for Loss of RHR – PWR POS – 2

Loss of RHR in POS-2	Recover RHR before Boiling	RCS Injection	Recover RHR before RWST Depletion	Make-up to RWST before CD		
LORHR2	RHR-S	FEED	RHR-R	RWSTMU	#	END-STATE-NAME
<p>Loss of RHR - PWR POS-2</p>						

ATTACHMENT 1

Revision History for IMC 0609, Appendix G, Attachment 2

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
N/A	ML041470302 05/25/2004 CN 04-015	Initial Issue	None	N/A
N/A	ML050700168 02/28/2005 CN 05-007	Revised the definition of available; add caution to account for unplanned entries into high risk configurations.	None	
N/A	ML19102A195 01/08/20 CN 20-004	<p>Re-formatted layout to conform with IMC-0040 current standards and a general editorial cleanup designed to make the procedure easier to use.</p> <p>Removed historical information regarding SRM to SECY 97-168 in the Purpose Section that no longer had value being in this attachment.</p> <p>Replaced the term performance deficiency with findings throughout this procedure.</p> <p>Added a sentence that headquarter risk analysts can also perform Phase 2.</p> <p>Added that a risk analyst or SRA can always do a Phase 3 evaluation if they feel the risk is not adequately being captured in a Phase 2.</p> <p>Added information that this procedure doesn't apply to AP1000 plants.</p>	None	ML19156A185

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
		<p>Added information that findings involving freeze seals or open cold leg penetrations need to be assessed via a Phase 3 detailed risk evaluation</p> <p>Edited definitions so that the definitions are consistent with what is contained in IMC 0609, Appendix G.</p> <p>Revised the definition for Shutdown Operations to align it with the scope of Appendix G.</p> <p>Revised the definition for a LOOP under initiating events to remove the statement that LOOP events are not assessed in POS 3, since there could be times that they are still addressed.</p> <p>Deleted a caution in step 4.1 about availability and another caution about standby injection since they are redundant and had already been mentioned in precaution section.</p> <p>Revised step 4.3.4 with information reminding users that other tools exist for calculating time to boil / uncover.</p> <p>Step 4.3.8 the word preliminary was added to make it clear any color significance assigned by a Phase 2 assessment is only preliminary.</p> <p>Table 9, the Counting Rule Worksheet was added to this procedure. And clarified that the preliminary color significance of the finding is determined by using the counting rule worksheet</p> <p>A typo is corrected in step 4.5.2. the correct value should be 0.</p>		

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
N/A		<p>Added a new precaution that it is possible that operator dominated sequences could have HEP values in this procedure that are lower than is what is recommended in the RASP manual. And a phase 3 detailed risk assessment can be performed if an analyst has concerns that the risk is being under-estimated. The same caution was also added in step 4.4.6.C</p> <p>Removed the language from section 01.01 regarding multiple performance deficiencies and referring to Appendix A. The guidance for those situations is in IMC 0308 Attachment 3.</p>		0609G2-1933 ML19112A190