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Proposed Revisions to Draft Branch Technical Position 8-8, Onsite and Offsite Power Sources Completion Time Extensions

Comment On: NRC-2019-0177-0001

Proposed Revisions to Draft Branch Technical Position 8-8 Onsite (Emergency Diesel Generators) and Offsite Power Sources Completion Time Extensions; Request for Comment on Draft Section of Standard Review Plan

Document: NRC-2019-0177-DRAFT-0003

Comment on FR Doc # 2019-24551

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General Comment

Industry Comments on Draft Revision to Branch Technical Position (BTP) 8-8, "Onsite and Offsite Power Sources Completion Time Extensions;" 84 FRN 61082-61083; Docket ID NRC-2019-0177

Attachments

01-09-20_Industry Comments on Draft Revision to Branch Technical Position (BTP) 8-8

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January 9, 2020

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Washington, DC 20555-0001

Subject: Industry Comments on Draft Revision to Branch Technical Position (BTP) 8-8, "Onsite and Offsite Power Sources Completion Time Extensions;" 84 FRN 61082-61083; Docket ID NRC-2019-0177

Project Number: 689

Dear Ms. Jennifer Borges:

The Nuclear Energy Institute (NEI)¹, on behalf of its members, submits the following comments on the draft revision to Branch Technical Position (BTP) 8-8, "Onsite and Offsite Power Sources Completion Time Extensions." We are supportive of the effort to revise this BTP, and appreciate the opportunity to comment on the draft revision.

In our review, we noted that the draft revision states that BTP 8-8 is not applicable to risk informed applications following Standard Review Plan (SRP) Section 19.2, "Review of Risk Information Used to Support Permanent Plant-Specific Changes to the Licensing Basis: General Guidance," which discusses applications using Regulatory Guide (RG) 1.174, "An Approach for using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis." Specifically, the draft BTP revision states that "Applications that deviate from the deterministic criteria outlined in this BTP should be reviewed in accordance with SRP Section 16.1, 'Risk-Informed Decision Making: Technical Specifications,' and SRP Section 19.2, 'Review of Risk Information Used to Support Permanent Plant-Specific Changes to the Licensing Basis: General Guidance.' Such reviews are outside the scope of this BTP." This appears to remove risk-informed submittals from the scope of BTP 8-8, a revision that the industry strongly supports. The NRC has committed to embracing risk information in all regulatory matters, and artificial limitations on application of risk information in diesel generator allowed outage times are inconsistent with this commitment. We recommend that the non-applicability to risk-informed submittals be made more explicit in the introduction of BTP 8-8.

¹ The Nuclear Energy Institute (NEI) is responsible for establishing unified policy on behalf of its members relating to matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect and engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations involved in the nuclear energy industry.

Ms. Jennifer Borges

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Additionally, since the current language specifically references SRP 19.2, the draft revision to BTP 8-8 could be read such that the contents of the BTP would remain applicable to submittals that use risk insights but are not classic, fully risk-informed submittals under RG 1.174. We recommend that the non-applicability to risk-informed submittals be extended to all risk-informed submittals, not just traditional RG 1.174 submittals

Finally, as discussed in Section B, the original BTP 8-8 was developed based on concerns related to grid reliability degradation due to deregulation and insights identified in NUREG-1784, "Operating Experience Assessment – Effects of Grid Events on Nuclear Power Plant Performance," regarding the probability and duration of loss of offsite power events as well as the consequential LOOP probabilities following a plant trip. The NUREG was issued in 2003. Over 15 years of operating experience has been accumulated since the issuance of the NUREG. This data should be reviewed to determine if BTP 8-8 is still necessary.

Detailed comments and suggested revisions are included in the attachment. We encourage NRC to consider all stakeholder comments; in particular, we endorse the Pressurized Water Reactor Owners Group comments on this draft revision of BTP 8-8. Please contact me at vka@nei.org or (202) 739-8101 with any questions or comments about the content of this letter or the attached comments.

Sincerely,



Victoria K. Anderson

c: Mr. Dennis Morey, NRR
Mr. Mark Notich, NRR
Mr. Michael Franovich, NRR
NRC Document Control Desk

Detailed Comments on Draft Revision to BTP 8-8, "Onsite and Offsite Power Sources Completion Time Extensions"

- The background section references outdated revisions of Regulatory Guide 1.93, "Availability of Electric Power Sources," and Standard Review Plan Section 19.1, "Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities," both of which were revised in 2012. Suggest referencing the most current revisions.
- The current draft revision appears to exclude risk-informed submittals from the scope of the BTP, but this exclusion could be made clearer. Suggest resolving this by stating, "This BTP does not apply to risk-informed submittals" at the end of the background section.
- It appears that this BTP applies to exigent tech spec changes, but this is not stated clearly. Suggest resolving this by stating "This BTP is applicable to exigent tech spec changes" at the end of the background section.
- On page 8-8-5, BTP 8-8 specifically disallows the use of the 24-hour allowance for restoring the alternate alternating current/supplemental power source. This is excessively restrictive and should be removed.
- On page 8-8-5, the draft BTP is overly restrictive in stating that "The extended CT [completion time] will be used no more than once in a 24-month period (or refueling interval) on a per diesel basis to perform EDG maintenance activities, or any major maintenance on offsite power transformer and bus." This restriction could force unneeded shutdowns for emergent failures that would take more than 72 hours to restore operability, or force people to move the maintenance back onto an outage if that had to use it for a failure. Suggest removing the first bullet on page 8-8-5 to address this.
- On page 8-8-6, there is a reference to RG 1.155 "Quality Assurance Guidance for Non-Safety Systems and Equipment," which may not be appropriate for that equipment. Suggest deleting the reference to RG 1.155.