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2/19/2020
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Docket: NRC-2012-0110

Issuance and Availability; request for comment (DG-1285, DG-1286, DG-1287, DG-1288)

Comment On: NRC-2012-0110-0018

An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications

Document: NRC-2012-0110-DRAFT-0015

Comment on FR Doc # 2020-03237

Submitter Information

Name: Chad Holderbaum

General Comment

See attached file(s) for PWR Owners Group comments.

Attachments

OG-20-123



Program Management Office
1000 Westinghouse Drive
Cranberry Township, Pennsylvania 16066

Project 694
Docket 99902037

April 15, 2020

OG-20-123

Office of Administration
Mail Stop: TWFN-7-A60M
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Program Management, Announcements and Editing Staff

Subject: PWR Owners Group, Risk Management Committee
PWROG Comments on Draft Regulatory Guide (DG), DG-1287, “An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications,” 85 FR 9484; Docket ID NRC-2012-0110

Dear Ms. Jennifer Borges,

The PWR Owners Group has developed on behalf of its members the attached comments on Draft regulatory guide (DG), DG-1287, “An Approach for Plant-Specific, Risk-Informed Decision-making: Technical Specifications”. This letter serves to transmit the PWR Owners Group comments to the NRC. The PWROG appreciates the opportunity to comment on DG-1287.

Attached to this letter please find:

- PWROG Comments on DG-1287 (Non-Proprietary) (Attachment 1)

If you have any questions, please do not hesitate to contact me at (602) 999-2080 or Mr. W. Anthony Nowinowski, Executive Director of the PWR Owners Group, Program Management Office at (412) 374-6855.

Sincerely yours,

A handwritten signature in black ink that reads "Michael E. Powell". The signature is written in a cursive, flowing style.

Michael Powell
Chairman and COO
PWR Owners Group

DSM:am

Attachment: PWROG Comments on DG-1287 (Non-Proprietary)

cc: PWROG PMO
PWROG Risk Management Committee
PWROG Licensing Committee
R. Linthicum, PWROG
M. Powell, PWROG
D. Mirizio, PWROG
C. Holderbaum, PWROG
W. Nowinowski, PWROG
L. Fields, US NRC

Attachment 1: PWROG Comments on DG-1287

Index	Comment
1	Page 21 & 22 – The ICCDP/ICLERP limits are inconsistent/lower than those allowed in NEI 06-09. To avoid confusion over which document has precedence for future applications, a footnote should be added to identify this exception.
2	Page 23 Section 2.6 “Integrated Decision Making”. This section notes that TS changes should not be based solely on the results of numerical PRA results. And equivalent discussion on not basing changes solely on deterministic results should be added to ensure decision reflect an Integrated Risk Informed process
3	Page 23 Section 3.2 – The discussion of Maintenance Rule Performance Criteria should be revised to Performance Monitoring to address plants that have transitioned to Maintenance Rule 2.0 where performance criteria aren’t used.
4	Page A-3 Section A-1.3.1 – Setting an event to “True” in a PRA model can have different impacts depending on the software used. It would be beneficial to define what is meant.
5	The purpose should note risk informed Technical Specification changes are one option, and that other options, such as deterministically based changes are allowed but not covered by this Regulatory Guide.