

# Post-TSTF-505 Adoption License Amendment Requirements to Add Additional Risk Informed Completion Times

## Problem Statement

At the August 6, 2020 TSTF/NRC quarterly public meeting, the TSTF and NRC discussed the requirements for a license amendment request (LAR) to add new Risk Informed Completion Times (RICTs) to a plant Technical Specifications (TS) if TSTF-505 had previously been adopted. It is unlikely that all of the information included in the licensee's original TSTF-505 LAR would be needed to support the addition of new RICTs. The NRC suggested the industry develop a strawman position for consideration. The TSTF worked with the NEI Risk Informed Technical Specifications Task Force (RITSTF) and the NRC to evaluate the applicability of TSTF-505 model application enclosures to such an application.

## Position

The TSTF, RITSTF, and NRC discussed considered a LAR that added new RICTs that are permitted under TSTF-505, Revision 2. Addition of new Modes of applicability or Required Actions not in TSTF-505, Revision 2, were outside the scope of the discussion.

The complexity of the LAR will depend on how similar the proposed RICTs are to the previously approved application. Addition of a RICT for a new system or class of systems (such as instrumentation) not in the licensee's original TSTF-505 LAR will likely require more justification than addition of a new RICT to a specification that has already been approved for a RICT.

Each of the model application enclosures are considered below:

<b>Enc.</b>	<b>Title</b>	<b>Applicability to New RICT</b>
1.	List of Revised Required Actions to Corresponding PRA Functions	This enclosure will be needed to describe the new Required Actions and the corresponding PRA functions.
2.	Information Supporting Consistency with Regulatory Guide 1.200, Revision 2	This enclosure may be needed to provide summary of any changes to the PRA model/methods that have not been evaluated and closed consistent with the licensee's process to implement RG 1.200.
3.	Information Supporting Technical Adequacy of PRA Models Without PRA Standards Endorsed by Regulatory Guide 1.200, Revision 2	This enclosure is unlikely to be needed.
4.	Information Supporting Justification of Excluding Sources of Risk Not Addressed by the PRA Models	This enclosure in the original TSTF-505 LAR may have discussed seismic and high winds penalties. New RICTs that are subject to those penalties may be affected and may need to be discussed in the context of potential risk increases due to out of service equipment.

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Enc.	Title	Applicability to New RICT
5.	Baseline CDF and LERF	This enclosure may be needed if changed significantly from the information approved in the original TSTF-505 amendment
6.	Justification of Application of At-Power PRA Models to Shutdown Modes.	This enclosure is not required. No plants have requested use of RICTs in shutdown modes.
7.	PRA Model Update Process.	This enclosure is not required. The information in this enclosure was approved in the original TSTF-505 amendment and is not affected by additional RICTs.
8.	Attributes of the Real-Time Model.	This enclosure is not required. The addition of new RICTs is unlikely to affect the real-time model.
9.	Key Assumptions and Sources of Uncertainty.	This enclosure may be needed to assess key assumptions and sources of uncertainty and associated impact on the new RICTs.
10.	Program Implementation	This enclosure is not required. The addition of new RICTs won't change the program implementation.
11.	Monitoring Program	This enclosure is not required. The addition of new RICTs won't change the monitoring program.
12.	Risk Management Action Examples Could have some additional RMAs	This enclosure could be required if the new RICTs result in new example RMAs or of a type that examples are requested of in the general TSTF-505 guidance.