

From: Miller, Ed
Sent: Friday, August 19, 2022 3:08 PM
To: Brian Mann
Cc: Honcharik, Michelle
Subject: Draft RAIs for TSTF-591 (L-2022-PMP-0003)
Attachments: DRAFT TSTF 591 RAIs_BC Approved.docx

Brian,

Attached is the NRC staff's draft RAI for the subject request. The questions are being transmitted to you to determine 1) If the questions clearly convey the NRC information needs, 2) Whether the regulatory basis for the questions are clear, and 3) If the information has already been provided in existing docketed correspondence. Additionally, review of the draft question will allow you to determine what response time you can support. After you've had a chance to review, please let me know if you would like to have a clarification call or public meeting to discuss. Thank you.

Ed Miller
(301) 415-2481

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Email Number: 1756

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Created By: Ed.Miller@nrc.gov

Recipients:
"Honcharik, Michelle" <Michelle.Honcharik@nrc.gov>
Tracking Status: None
"Brian Mann" <brian.mann@excelservices.com>
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REQUEST FOR ADDITIONAL INFORMATION FOR
TSTF-591, REVISION 0, "REVISE RISK INFORMED COMPLETION
TIME (RICT) PROGRAM"
TECHNICAL SPECIFICATIONS TASKFORCE,
A JOINT OWNERS GROUP ACTIVITY

APLA DRAFT RAI 1

Section 3.3 of the TSTF provides a bulleted list of the contents that the proposed report must include. Bullet 3 specifically discusses that the report should include open facts and observations (F&Os) from the peer-review of the implementation of the NDM. Throughout Section 3.1 of the TSTF, specifically the second to last paragraph, the TSTF does not discern between open technical-F&Os, or open implementation-F&Os resulting from an NDM peer review. Furthermore, Section 3.1 of the TSTF states in part,

If open finding-level F&Os from an NDM peer review cannot be successfully closed via an NRC-endorsed peer review process, the NDM could be submitted to the NRC to determine the acceptability of the NDM. Submitted applications that use NDMs with open finding-level F&Os related to the NDM will be subject to review by the NRC to determine acceptability of the NDM, its implementation in the PRA, and its potential impact on the application."

The above paragraph from the TSTF discusses the submission of applications for NRC staff review of NDMs for acceptability where open finding level F&Os cannot be closed via an NRC-endorsed peer review process. It is unclear to the staff what the specific application processes the TSTF is referring to (e.g., Topical Report). Furthermore, the NRC observes the proposed TSTF stipulates submittal of the NDM report only prior to the use in a RICT calculation. Please provide the following information:

- a. Confirm for the report proposed to be submitted that any open F&Os from the technical review will all be closed using an NRC-endorsed peer-review process, and any remaining open F&Os from the implementation peer-review will be included in the report.
- b. From Section 3.1 of the TSTF, identify which submittal process the TSTF is proposing to be used for a licensee to submit NDMs when open finding -level F&Os from an NDM peer review cannot be successfully closed using an NRC-endorsed peer review process. In addition, confirm the type of open finding-level F&Os (i.e., technical, implementation, or both).
- c. As discussed in RAI 1.b above, the TSTF states when an open-F&O cannot be closed, the NDM can be submitted to the NRC for acceptability review. The NRC notes, that the proposed reporting requirement in this TSTF only requires the NDM to be reported, and therefore is not subjected to a regulatory review process at the time of reporting. Therefore, it is unclear if the licensee intends to submit an NDM prematurely before the appropriate NRC staff determination of acceptability has been concluded. Explain how the NDM will not be used in the RICT program before an NRC determination of acceptability.

APLA DRAFT RAI 2

In Appendix A of the LAR, within the column titled *Discussion* for 5.6.X, states in part, "A newly developed method" that has been previously submitted by a licensee no longer satisfies the definition of a "newly developed method" and a report is not required...

In the glossary of RG 1.200, Revision 3 the definition of newly developed method and consensus method is described as follows:

Consensus method/model: In the context of risk-informed regulatory decisions, a method or model approach that the NRC has used or accepted for the specific risk-informed application for which it is proposed. A consensus method or model may also have a publicly available, published basis and may have been peer reviewed and widely adopted by an appropriate stakeholder group.

Newly developed method: A PRA method that has either been developed separately from a state-of-practice method or is one that involves a fundamental change to a state-of-practice method. An NDM is not a state-of practice or a consensus method.

Section C.2.2.2 of RG 1.200, Rev. 3 further states “[t]he use of an NDM in a PRA is considered a PRA upgrade. For the submittal of the RICT program upgrades report, the report is submitted to the docket No. for that specific facility operating license (FOL) RICT program and is not considered generically applicable to other RICT programs. The NRC staff is not aware of any publicly available, or published basis that concludes the accepted-generic use of the NDM for the specified risk-informed application. Considering the above, it is unclear to the NRC staff how an NDM that has been previously submitted by one licensee would not be required to be submitted by another licensee to be used in their RICT program. In that context, address the following:

- a. The proposed TS 5.6.[X] is titled “Risk Informed Completion Time (RICT) Program Upgrade Report”. Inherit in the title, the scope of the report is intended to include upgrades, specifically those upgrades that include NDMs. Discuss why an NDM that has been reported by a licensee does not have to be reported by another licensee for use in their RICT program. In the discussion explain how that NDM meets the definition to be considered a consensus method, as defined in the glossary of RG 1.200, Revision 3, thereby making it applicable to be used generically in the RICT program. In the explanation identify the publicly available, or published basis where the NRC staff has determined that the NDM is accepted for use in the TS program (i.e., generic to the TS program and not specific to a docketed licensee’s TS program)? The NRC staff acknowledges that the regulatory position C.2.2.2.2 in RG 1.200, Rev. 3 recognizes that Section 5.2 of PWROG-19027-NP states that the peer review report for an NDM must be publicly available.

APLA DRAFT RAI 3

Appendix A of the TSTF, within the column titled *Discussion* for C.1, states in part, “[t]he details in the NRC’s 2021 proposal Paragraph f and 2022 proposal Paragraph g duplicate requirements in RG 1.200, regulatory positions C.1 through C.4...” RG 1.200, Revision 3 provides guidance for the acceptability of PRA results for risk-informed activities and is not specific to the RICT program. Therefore, it cannot be assumed that conformance only to RG 1.200, Rev. 3 would be sufficient to meet the requirements for acceptability of the PRA for use in the RICT program, and consistent with NEI 06-09-A. Address the following:

- a. Propose alternative language to paragraph f for the proposed TS 5.5.[XX] that ensures the inclusion of all PRA model requirements, e.g., that includes NDM reporting for this specific risk-informed activity (i.e., RICT program) that the NRC has approved in PWROG-1907-NP, and NEI 06-09-A, where the guidance stipulates the PRA must be updated every 2 refueling cycles.

Furthermore, for the proposed Model Application, in Section 3.1 for No Significant Hazards Consideration Analysis No. 3, the response states in part, “[t]he proposed change updates the standard for maintaining and updating PRA models used to calculate a RICT from NRC-approved Regulatory Guide 1.200, Revision 2, to NRC-approved Regulatory Guide 1.200, Revision 3. As discussed above RG 1.200, Revision 3 provides guidance for the acceptability of PRA results for risk-informed activities and is therefore not specific to the RICT program. NRC issuance of a Safety

Evaluation for the approval of a licensee's RICT program does not only consider RG 1.200, but also considers the approved industry NEI guidance for the RICT program and other applicable guidances. Address the following:

- b. Propose alternative language to response No. 3 in Section 3.1 for the No Significant Hazards Consideration Analysis that ensures the inclusion of all PRA model requirements, e.g., includes NDM reporting for this specific risk-informed activity that the NRC has approved in PWROG-1907-NP, and NEI 06-09-A, where the guidance stipulates the PRA must be updated every 2 refueling cycles

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