

From: Michael Mahoney
Sent: Monday, May 8, 2023 4:34 PM
To: Davis, J.Michael
Cc: Mack, Jarrett; Natreon Jordan; Gregg Ellis
Subject: Audit Plan - St. Lucie ITS Conversion LAR - Setpoints (EPID L-2022-LLI-0000)
Attachments: St. Lucie - Audit Plan - ITS Setpoints.docx

Mike,

By letter dated September 15, 2021 (ML21265A284) as supplemented by letters dated June 3, 2022 (ML22154A323), November 17, 2022 (ML21320A261), and January 19, 2023 (ML22019A069), Florida Power and Light Company (FPL, the licensee) submitted a license amendment request for the St. Lucie Plant, Units 1 and 2, to revise the current Technical Specifications (CTS) to Improved Technical Specifications (ITS) consistent with NUREG 1432, "Standard Technical Specifications – Combustion Engineering Plants," Revision 5.

To improve the efficiency of the NRC staff's review, FPL's representatives and the NRC staff have discussed the performance of an NRC staff audit using an online reference portal that would allow the NRC staff limited, read-only access to the information identified in Section 5.0 of the attached audit plan. The NRC staff plans to conduct a desk audit to review the documentation provided on the portal. The online reference portal would allow the NRC staff to audit internal licensee information to confirm that the information support statements were made in the LAR and to determine whether the information included in the documents is necessary to reach a safety conclusion on the application. Any audit information that the NRC staff determines to be necessary to support the development of the NRC staff's safety evaluation will be requested to be formally submitted on the docket. The audit may also include interactions (e.g., teleconferences or webinars) on a mutually agreeable schedule sufficient to understand or resolve issues associated with the information made available on the online reference portal.

Use of the online reference portal is acceptable, as long as the following conditions are met:

- The online reference portal will be password-protected, and passwords will be assigned to those directly involved in the review on a need-to-know basis.
- The online reference portal will be sufficiently secure to prevent NRC staff from printing, saving, or downloading any documents; and
- Conditions of the use of the online reference portal will be displayed on the login screen and with concurrence by each user.

These conditions associated with the online reference portal must be maintained throughout the duration of the audit process.

The NRC staff would like to request that the portal be populated with the information identified in section 5.0 of attached audit plan. The NRC staff may request additional documents during the review, which will be transmitted to you via email.

This email will be added to ADAMS (public), and I will provide you with the accession number.

If you have any questions, please contact me.

Thanks

Mike Mahoney

Project Manager, LPL2-2

Division of Operating Reactor Licensing

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REGULATORY AUDIT PLAN
REGARDING LICENSE AMENDMENT REQUEST FOR
CONVERSION TO IMPROVED STANDARD TECHNICAL SPECIFICATIONS
FLORIDA POWER AND LIGHT COMPANY
SAINT LUCIE PLANT, UNITS 1 AND 2
DOCKET NOS. 50-335 AND 50-389
EPID NO. L-2021-LLI-0000

1.0 BACKGROUND

By letter dated September 15, 2021 (ML21265A284) as supplemented by letters dated June 3, 2022 (ML22154A323), November 17, 2022 (ML21320A261), and January 19, 2023 (ML22019A069), Florida Power and Light Company (FPL, the licensee) submitted a license amendment request (LAR) for the Saint Lucie Plant, Units 1 and 2 (St. Lucie).

The proposed LAR will revise current Technical Specifications (CTS) to Improved Technical Specifications (ITS) consistent with NUREG 1432, "Standard Technical Specifications – Combustion Engineering Plants," Revision 5.

The NRC staff's review of the LAR has commenced in accordance with the Office of Nuclear Reactor Regulation (NRR) Office Instruction LIC-101, "License Amendment Review Procedures." The NRC staff has determined that a regulatory audit should be conducted in accordance with the NRR Office Instruction LIC-111, Revision 1, "Regulatory Audits," (ML19226A274), for the NRC staff to gain a more detailed understanding of the licensee's proposed license amendment (LA).

A regulatory audit is a planned, license-related or regulation-related activity that includes the examination and evaluation of primarily non-docketed information. A regulatory audit is conducted with the intent to gain understanding, to verify information, and/or to identify information that will require docketing to support the basis of the licensing or regulatory decision. Performing a regulatory audit of the licensee's information is expected to assist the NRC staff in efficiently conducting its review or gain insights on the licensee's processes or procedures. Information that the NRC staff relies upon to make the safety determination must be submitted on the docket. However, there may be supporting information retained as records under Title 10 of the *Code of Federal Regulations* (10 CFR) 50.71, "Maintenance of records, making of reports," and/or 10 CFR 54.37, "Additional records and record-keeping requirements," which although not required to be submitted as part of the licensing action, would help the NRC staff better understand the licensee's submitted information.

2.0 REGULATORY AUDIT BASIS

An audit was determined to be the most efficient approach toward a timely resolution of questions associated with this LAR review, because the NRC staff will have an opportunity to minimize the potential for requests for additional information (RAIs) and ensure no unnecessary

burden will be imposed by requiring the licensee to address issues that are no longer necessary to make a safety determination. The NRC staff is requesting an initial set of internal licensee information (found in section 5.0 of this audit plan) to be reviewed by the staff using an online reference portal. Upon completion of this audit, the NRC staff is expected to achieve the following.

1. Confirm licensee information which supports statements made in the LAR.
2. Determine whether the information included in the documents is necessary to be submitted to support a safety conclusion.

The audit information that the NRC staff determines to be necessary to support the development of the NRC staff's safety evaluation will be requested to be submitted on the docket.

3.0 REGULATORY AUDIT SCOPE OR METHOD

The purpose of the audit is for the staff to review and understand the licensee's implementation of the footnotes that have been proposed for addition into ITS Table 3.3.1-1, "Reactor Protective System Instrumentation," and ITS Table 3.3.3-1, "Engineered Safety Features Actuation System Instrumentation," to verify that limiting safety system settings (LSSS)-related instrument channels are functioning as required before returning the channel to service following a required surveillance. In particular, the staff needs to understand how the instructions in the proposed ITS table footnotes and the performance test acceptance criteria applied during surveillances are consistent with the setpoint methodology specified in Section 7.2.2.5 of the UFSAR. The staff may need to review other documents associated with the referenced UFSAR section and the ITS LAR.

To understand the methodology for determining the as-found acceptance criteria band and other surveillance-related criteria discussed in the setpoint methodology, the staff requests the licensee to walk through one or more examples of how LSSS are established, and how they relate to the methodology identified in Section 7.2.2.5 of the UFSAR. In addition, the staff needs to understand how performance test acceptance criteria used in required surveillance tests are determined. Finally, the staff needs to understand how information derived from the setpoint calculations and the channel surveillance procedures relate to the values that are placed into the Technical Specifications. For more specific information related to the scope, refer to Section 5.0 of the audit plan.

4.0 AUDIT TEAM

To support its understanding of these items, the NRC audit team anticipates that it will require access to licensee personnel knowledgeable of the technical aspects of the ITS LAR. In particular, the NRC staff expects that it will need direct input from licensee staff or designated individuals (e.g., licensee vendors) who are knowledgeable in determining LSSS instrument setpoint calculations, establishing acceptance criteria used to perform technical specification surveillances, developing performance tests related to calibrations of technical specification-related instruments, and who can explain examples of associated surveillance procedures. This need for access to cognizant licensee personnel may include a need for access to licensee vendors/contractors who perform setpoint calculations and licensee staff responsible in reviewing and approving work related to setpoint calculations and/or calibrations.

NRC Audit Team

The audit will be conducted by NRC staff from the NRR Division of Engineering and External Hazards (DEX), Instrumentation and Controls Branch (EICB) and the Long-term Operations and Modernization Branch (ELTB) who are knowledgeable in instrument setpoint calculations and calibrations, and associated surveillance procedures. The audit will be led by staff from the NRR Division of Operating Reactor Licensing (DORL). Additionally, staff from the Technical Specifications Branch (STSB) within the Division of Safety Systems (DSS) will participate in the audit. NRC staff from other organizations may be assigned to the team as appropriate and others may participate as observers. Observers at the audit may include NRR Project Managers and various Regional staff.

The following are members of the NRC audit team:

Team Member	Title	Organization
Mike Mahoney Michael.Mahoney@nrc.gov	Project Manager	NRR/DORL/LPLII-2
Bill Roggenbrodt William.Roggenbrodt@nrc.gov	Electronics Engineer	NRR/DEX/EICB
Dave Rahn David.Rahn@nrc.gov	Senior Electronics Engineer	NRR/DEX/ELTB
Khadijah West Khadijah.West@nrc.gov	Safety and Plant Systems Engineer	NRR/DSS/STSB
Steve Smith Stephen.Smith@nrc.gov	Senior Safety and Plant Systems Engineer	NRR/DSS/STSB
Tarico Sweat Tarico.Sweat@nrc.gov	Reactor Systems Engineer	NRR/DSS/STSB

5.0 PROPOSED AUDIT QUESTIONS/INFORMATION REQUESTS

5.1 Documents Requested on Portal

Doc. #	Document Title
1.	Safety Analysis Plant Parameters (SAPP) Document.
2.	Procedures or controlled document(s) that show the Analytical Limit as a starting point for the calculation of LSSS setpoints and allowable values.
3.	Examples of summary setpoint calculations.
4.	Procedures that identify how to determine the setpoint and allowable value information that is shown in the TS Tables and that are based on setpoint uncertainty calculations performed per IC-3.17.
5.	Examples of calibration procedures that use information determined through the IC-3.17 Setpoint Methodology, including the determination of total loop uncertainty (TLU) and how the TLU relates and those relevant values are applied as performance test acceptance criteria in surveillance tests.
6.	Any procedures related to the use and application of the SAPP.

5.2 Audit Questions

Introduction

The proposed ITS Section 3.0 Table markup applies Technical Specifications Task Force Traveler (TSTF)-493, Revision 4, "Clarify Application of Setpoint Methodology for LSSS Function" Option A – "Addition of Notes 1 and 2 to the Agreed Upon Functions," (ML101160026) as part of the request to convert the CTS to ITS based on NUREG-1432, Revision 5. TSTF-493 Option A is incorporated into Revision 5 of the Standard Technical Specifications (STS).

Notes 1 and 2 are included as footnotes to STS Section 3.3 instrumentation tables. Note 1 of TSTF-493, Option A, discusses the application of an as-found tolerance (AFT) to surveillance requirements (SRs) for specific TS functions. Likewise, Note 2 of TSTF-493, Option A, discusses the application of a predetermined AFT band about the limiting trip setpoint (LTSP), the nominal trip setpoint (NTSP), or the actual as-left field setting of the SRs (Channel Calibration and Channel Operational Test). This surveillance as-left field setting must be within a predetermined as-left tolerance (ALT) band. Additionally, Section 4.0, "Technical Analysis," Option A of the TSTF-493 traveler states, in part:

Implementation of Note 1 requires the licensee to calculate an as-found tolerance.

In addition, the TSTF-493 traveler includes a Model Application for Adoption of TSTF-493 Option A (ML100710442), which states, in part:

Additionally, to ensure proper use of the allowable value (AV), LTSP, and NTSP, the methodology for calculating the as-left and as-found tolerances must also be included in [the FSAR] [a document incorporated by reference in the FSAR] and listed in surveillance Note 2 as discussed in Section 3.1.2, below.

The marked-up pages in ITS Tables 3.3.1-1 and 3.3.3-1 refer to St. Lucie Units 1 and 2's UFSAR, Section 7.2.2.5, "Protection System Setpoint Methodology and Determination of Surveillance Procedure Acceptance Criteria." The subsection discusses the EPU LA and St. Lucie's setpoint methodology, "IC-3.17, Instrument Setpoint Methodology."

Audit Questions Background:

Related to the scope of the audit, the staff began its review by examining the marked-up technical specifications (TS) pages for ITS Table 3.3.1-1, "Reactor Protective System Instrumentation," and ITS Table 3.3.3-1, "Engineered Safety Features Actuation System Instrumentation," in LAR Enclosure 2 Volume 8, Revision 1 (ML22154A323).

Specifically, proposed Footnotes a and b in ITS Tables 3.3.1-1 and 3.3.3-1 would call for the licensee to evaluate the channel to verify that it is functioning as required before returning the channel to service. The footnotes make reference to certain methodologies used to determine the as-found and as-left acceptance criteria bands that are specified in the Technical Requirements Manual and Section 7.2 (RPS) or 7.3 (ESFAS) of the UFSAR.

While evaluating the references identified within the proposed ITS table footnotes, the staff reviewed Section 7.2.2.5 of the UFSAR, "Protection System Setpoint Methodology and Determination of Surveillance Procedure Acceptance Criteria." In this section, the staff noted there are references to the extended power uprate (EPU) LA and FPL Nuclear Engineering Department Discipline Standard IC-3.17, Instrument Setpoint Methodology.

The staff reviewed the licensing basis for the NRC-approved EPU setpoint change, however the staff could not completely understand how the application of the approach described in the EPU LA will be applicable to the functions described in the ITSs (see Question AQ-2). Further, the staff could not understand the methodology used for determining the as-found acceptance criteria band and other surveillance-related criteria discussed in the setpoint methodology.

The NRC staff needs to understand how the licensee would implement the proposed surveillance Notes 1 and 2 of TSTF-493, Option A for determining whether an instrument channel is functioning as required (as described in Option A of TSTF-493). In addition, the staff needs to understand which terms within the licensee procedure IC-3.17 are defined to be the same as those depicted in the surveillance instructions applicable to Footnotes (a) and (b) in Tables 3.3.1-1 and 3.3.3-1. Since the licensee plans to use IC-3.17 to identify how the channels will be determined to be functioning as required during a channel surveillance, the NRC staff expects that the licensee's setpoint methodology for establishing and maintaining LSSS functional limits will clearly define how the key TSTF-493 terms of ALT and AFT are established and used as surveillance acceptance criteria for the instrument functions having an associated LSSS.

Audit Question (AQ)-1

Please clarify the meaning and relationship of the values listed in the technical specification tables in ITS Section 3.3 (labeled as "Trip Setpoint" and "Allowable Value") to the "Setpoint Value" and "Allowable Value" equations and values described and computed within the licensee's referenced setpoint procedure, IC-3.17, Sections VIII.E and VIII.F. Specifically, are IC-3.17 equations VIII-5 through VIII-8 used to determine the values shown in the TS tables? If not, what section within IC-3.17 or other licensee methodology describes how the TS table values identified as "Trip Setpoint" and "Allowable Value" are determined?

AQ-2

While reviewing Section 7.2.2.5 of the UFSAR to understand its applicability to the proposed request, the staff noted the reference to the Extended Power Uprate (EPU) LAR. Specifically, for St. Lucie Unit 1, concerning Function 7 in CTS Table 2.2.1 (Function 8 for St. Lucie Unit 2) – During the EPU License Amendment Request (LAR), in St. Lucie's RAI response concerning Function 7, "SG Level Low function," the RAI response appears to support a setpoint method consistent with Regulatory Issue Summary (RIS) 2006-17, "NRC Staff Position on the Requirements of 10 CFR 50.36, 'Technical Specifications,' Regarding Limiting Safety System Settings During Periodic Testing and Calibration of Instrument Channels," that describes the NRC staff's interpretation of 10 CFR 50.36(c)(1)(ii)(A).

Additionally, for the remaining LSSS-related functions, during its review of Table 2.2-1, "Reactor Protective Instrumentation Trip Setpoint Limits," in the CTS, the staff observed that some of the Trip Setpoint and Allowable Value are depicted within the marked tables in the ITS, such that the trip setpoint value is allowed to be set in a range where each setpoint is allowed to exactly equal the functional unit's AV, while other functions have two separate parameter values for trip setpoint and AV.

If the trip setpoint range is allowed to equal the AV this may lead to a plant condition where a considerable amount of time between surveillance tests may exist where this

channel may operate beyond its acceptable AV range once factors such as drift and other local condition uncertainty components are realized after the 'as-left' measured value of the instrument is established at the completion of a surveillance test. During an accident scenario this may cause the analytical limit for this channel to be exceeded.

AQ-2a.

What process or procedural controls does the St. Lucie licensee employ to ensure that the trip of the instrument channel at values greater than the AV cannot occur for the LSSS-related functions?

AQ-2b.

Additionally, how does the licensee ensure that sufficient margin exists between the as-left acceptance criterion band and the AV such that during the operating cycle, the as-found measured value of a given setpoint will not exceed AV?

AQ-2c.

Since an AFT band is being computed for the LSSS-related functions, under what circumstances and how will the As-Found Acceptance Criterion (AFAC) band be used to meet the requirements specified in Footnote (b) to ensure the Allowable Value is not exceeded?

AQ-2d.

In the RAI Response for the EPU LAR licensing action dated November 1, 2011, the term 'Field Trip Setpoint' (FTSP) is used in Response EICB-01F. However, in reviewing IC-3.17 the staff was unable to locate the same term. Are there any equivalent terms to 'Field Trip Setpoint' in IC-3.17 or is FTSP identical to 'Nominal Trip Setpoint' in IC-3.17?

AQ-3

For each of the instruments listed in the current technical specifications (CTS) Tables 2.2.1, "Reactor Protective Instrumentation Trip Setpoint Limits," and 3.3-4, "Engineered Safety Feature Actuation System Instrumentation Trip Values, what specific Setpoint Methodology is being used for each instrument? Per the St. Lucie updated final safety analysis report (UFSAR) Section 7.2.2.5, "Protection System Setpoint Methodology and Determination of Surveillance Procedure Acceptance Criteria," the first paragraph discusses the setpoint change made to the RPS low SG level trip due to an extended power uprate (EPU). In reviewing paragraphs two and three it is unclear to the staff if the text is referring exclusively to the RPS low SG level trip associated with the EPU LAR or if the application of the IC-3-17 Setpoint Methodology is applied to all limiting safety system settings (LSSS) setpoints.

Please clarify the scope of the instruments (all LSSS setpoints or only to these setpoints impacted by the EPU) to which these paragraphs refer.

AQ-4

In Section 3.0, "Applicability" of "Instrument Setpoint Methodology for Nuclear Power Plants," also known as "Nuclear Engineering Department Discipline Standard IC-3.17" it states:

New instrument setpoints that require a setpoint calculation and that perform a safety related function or are required for Technical

Specification compliance associated with FPL Nuclear Plants shall be developed on the graded approach basis of this standard with the exception of the Reactor Protection System (RPS) and Engineered Safety Features Actuation System (ESFAS) at Turkey Point Units 3 & 4. Those RPS and ESFAS setpoints were established using the Westinghouse methodology described in WCAP-12745.

The staff's current understanding is that WCAP-12745 applies only to Turkey Point non-EPU setpoints, however the text above may be interpreted in such a manner that the WCAP-12745 report may also apply to St. Lucie LSSS setpoints.

Please clarify if WCAP-12745 is intended to apply to new St. Lucie LSSS setpoints that will be calculated as approved by this LAR and identify which setpoint methodologies are currently applied for the existing St. Lucie LSSS as described above for IC-3.17. What process, procedure, or programmatic controls exist for the other (i.e., "non-new") St. Lucie LSSS setpoints that have not been modified in accordance with the Section 3.0 description above? What if any setpoint methodologies, other than IC-3.17 are used instead of IC-3.17?

AQ-5

Related to Nuclear Engineering Department Discipline Standard, IC-3.17, it appears to be a unidirectional setpoint methodology, versus bi-directional setpoint methodology.

If IC-3.17 is a unidirectional method, what measures will St. Lucie take to ensure that if a given instrument channel referenced in current technical specifications (CTS) Tables 2.2.1, "Reactor Protective Instrumentation Trip Setpoint Limits," and 3.3-4, "Engineered Safety Feature Actuation System Instrumentation Trip Values, is found to be out of tolerance in the conservative direction (i.e., away from the analytical limit) – meaning beyond the AFT or equivalent term, that it is '*functioning as required*' consistent with the requirements of 10 CFR 50.36(c)(1)(ii)(A) and further clarified in the guidance of RIS 2006-17?

AQ-6

In the Nuclear Engineering Department Discipline Standard, IC-3.17 procedure, two methods referred to as Method 1 and 2 are described in Appendix A. (Method 1 examines uncertainties between the Analytical Limit and the AV and Method 2 examines uncertainties between the setpoint and the as found acceptance criteria (AFAC), also referred to as the AV.)

AQ-6a.

Related to Method 2 described in Section 3.3.2 of Appendix A of IC-3.17, why is Margin applied to 'this' side of the allowable value (AV), (i.e., between the setpoint and the AV)? This approach would potentially result in masking an instrument channel that is 'not functioning as required' in accordance with of 10 CFR 50.36(c)(1)(ii)(A) and further clarified in the guidance of RIS 2006-17. Therefore, this situation would not guarantee that this instrument channel would perform its required actions during a design basis event with sufficient margin to ensure the analytical limit was not exceeded.

AQ-6b.

Related to Method 2, when the term setpoint or “SP” is used, to what ‘setpoint’ value is the document referring? (The ‘nominal setpoint’ definition in the IC-3.17 procedure [that contains no additional margin] or is it another ‘setpoint’ value?)

AQ-6c.

Which procedure or methodology identifies how to determine the values that are to be listed in the TS Tables as either the ‘Trip Setpoint’ or AV?

The staff is uncertain because the OL listed in Westinghouse CN-TAS-09-5, also known as the Operability Limit, is defined as the allowable value. However, in IC-3.17, operational limits or OL is defined as part of the setpoint equations for non RPS or ESFAS functions.

AQ-6d.

Which procedure or methodology specifies how to translate the results of the loop uncertainty calculations into calibration and functional surveillance procedures?

AQ-6e.

How are the as-found and as-left acceptance criteria bands described in the footnotes related to the Operability Limit (OL)+ and OL- terms?

AQ-6f.

Is the Analytical Limit described in IC-3.17 identical to the safety analysis plant parameter (SAPP) value? If not, what does the SAPP value represent and is it based on the analytical limit or is it some other type of derived value?

AQ-7

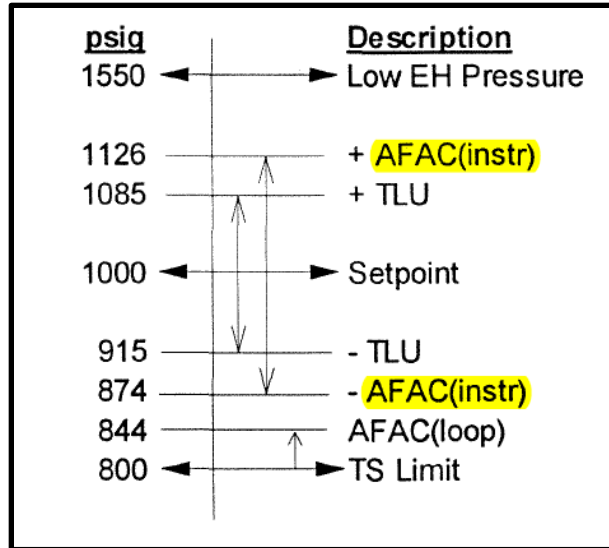
On Page A-9 of Appendix A of IC-3.17, Setpoint Methodology the As-Found / As-Left Uncertainty (AFAL) is described and represents the **anticipated calibration error** associated with loop or device error and is applicable only when the as-left calibration data is subtracted from the as-found data for determination of calibration errors. How is this AFAL value then applied to the As-Found Acceptance Criteria (AFAC). Is AFAL ever used or applied? Or is it simply a reference to determine how it compares to the calculated error value over time? Is there another procedure that describes how to convert AFAL information into AFAC information?

AQ-8

In Example 1 of Appendix A, Unit 1 PS-22-120, (Page A24) of IC-3.17 the example diagram depicts the “ \pm AFAC(instr)” value exceeding the TLU. However, in Section VIII. Setpoint Determination Part D, it describes the “Total Loop Uncertainty (TLU) Equation” and in Part E, “Setpoint Value Equations for RPS & ESFAS Functions” it describes the setpoint (SP) equal to the analytical limit (AL) minus the TLU.

$$SP = AL - TLU$$

In Example 1 of Appendix A of IC-3.17 is it acceptable for the AFAC value to exceed the TLU, based on a comparison of the diagram and the equation above? If so, how does this address TSTF-493 criteria?



From Example 1 in IC-3.17 Page A24

AQ-9

To understand the methodology for determining the as-found acceptance criteria band and other surveillance-related criteria discussed in the setpoint methodology, the staff requests the licensee to walk through one or more examples of how LSSS are established, and how they relate to the methodology identified in Section 7.2.2.5 of the UFSAR and how they are translated into performance test acceptance criteria used in procedures for SRs.

Note that additional audit questions and documentation requests may be developed after reviewing responses to the above audit questions and documentation requests. Additionally, the above audit questions may be revised as responses are reviewed.

6.0 LOGISTICS

The virtual audit will be started once an electronic reference portal is set up and the draft documentation addressing the items in 5.0 of this audit report is made available to the NRC staff. The initial desk audit will be conducted over several days. The NRC project manager will coordinate with the NRC staff and licensee for any teleconferences needed after the NRC staff has reviewed the documentation. The audit will include interactions (e.g., teleconferences) on a mutually agreeable schedule sufficient to understand or resolve issues associated with the information made available. The audit team's access to the online portal may be terminated after completion of the virtual audit at a time established by the project manager.

7.0 SPECIAL REQUESTS

The NRC requests access to requested documents and information through a Web-based portal that allows the NRC staff to access documents via the internet. The following conditions associated with the online portal must be maintained while the NRC staff have access to the online portal:

- The online portal will be password-protected. A separate password will be assigned to each member of the NRC staff participating in the audit.
- The online portal will prevent the NRC participants from printing, saving, downloading, or collecting any information directly from the online portal.
- Conditions of use of the online portal will be displayed on the login screen and will require acknowledgment by each user.

Username and password information should be provided directly to members of the NRC staff. The NRC licensing project manager will provide the licensee names and contact information of the NRC staff participating in the audit. All other communications should be coordinated through the NRC project manager.

8.0 DELIVERABLES

An audit summary will be prepared within 90 days of the completion of the audit. If the NRC staff identifies information during the audit that is needed to support its regulatory decision, the staff will issue RAIs to the licensee.