

# **STPNOC Perspective on LBLOCA Rule Change (10 CFR 50.46a)**

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March 24, 2011

# Desired Outcome

- Communicate STP's position on the proposed change to 10CFR50.46a
- Communicate the effect on a licensee of adopting the rule
- Identify possible paths forward

# STP Position

- Break  $>$  Transition break size very low probability
- Rule requirements need to be commensurate with risk from event
- Need predictability in application of the rule

# Rule Requirements Not Commensurate with Risk

- Adopting the current rule may impose more cost and burden than the existing requirements
  - At least 3 new analyses
  - Expanded change control
  - Early implementation of Aging Management
  - Operating restriction
  - PWSCC mitigation prior to rule implementation

# Predictability is Important to Adopting the Rule

- Applications of the rule are likely to be complex and require significant planning lead time (e.g., power uprate, GSI-191).
  - Engineering resource intensive
  - Coordination of schedule for outage implementation
    - Must consider NRC review and approval process
- Predictability is necessary in the decision-making process

# Recommended Actions

- Simplify the requirements
- Use existing change control processes
- Rule language that allows application to GSI-191
- Issue the rule and all regulatory guidance at the same time