

Luminant Power-NRC Meeting



Comanche Peak Lead Plant LAR to Relocate Tech
Spec 3.3.1 and 3.3.2 LCOs that do not Satisfy
Any of the Criteria of 10CFR50.36(c)(2)(ii)

September 13, 2011

Luminant Power-NRC Meeting: Relocate CPSES TS 3.3.1 and 3.3.2 LCOs that do not Satisfy the Criteria of 10CFR50.36(c)(2)(ii)

Agenda

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- Purpose of the PWROG Program
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- Precedent
- Need for the Change
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- Summary of the March 2, 2011 NRC/PWROG Meeting
- Overall Approach
- Details of Approach
- Schedule
- Other Options Considered
- Summary and Conclusions
- Comments and Open Discussion

Luminant Power-NRC Meeting: Relocate CPSES TS 3.3.1 and 3.3.2 LCOs that do not Satisfy the Criteria of 10CFR50.36(c)(2)(ii)

Purpose of the Meeting

- Discuss with the NRC Staff the Comanche Peak Units 1 and 2 lead plant License Amendment Request (LAR) that will propose to relocate the LCOs in Technical Specifications (TS) 3.3.1, “RTS Instrumentation,” and 3.3.2, “ESFSA Instrumentation,” that do not satisfy any of the Criteria of 10CFR50.36(c)(2)(ii) out of the TS to a licensee controlled document
- Obtain Staff feedback

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Purpose of the PWROG program

- Identify the LCOs in TS 3.3.1 and 3.3.2 of the Comanche Peak TS that satisfy Criterion 3 of 10CFR50.36(c)(2)(ii) by reviewing Chapters 6 and 15 of the Comanche Peak safety analyses
- Identify the LCOs in TS 3.3.1 and 3.3.2 of the Comanche Peak TS that satisfy Criterion 4 of 10CFR50.36(c)(2)(ii) by reviewing the PRA and other Risk-Informed TS changes that have been implemented
- Determine the LCOs in TS 3.3.1 and 3.3.2 of the Comanche Peak TS that satisfy the Criteria of 10CFR50.36(c)(2)(ii) as discussed above

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Purpose of the PWROG program (cont.)

- RTS and ESFAS instrumentation does not satisfy Criteria 1 and 2 of 10CFR50.36(c)(2)(ii), since it does not detect RCS leakage and is not a process variable, design feature, or operating restriction that is an initial condition of a DBA or transient analysis
- Prepare and submit a lead plant LAR that proposes to relocate the LCOs in TS 3.3.1 and 3.3.2 of the Comanche Peak Units 1 and 2 TS that do not satisfy any of the Criteria of 10CFR50.36(c)(2)(ii)

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Background

- WCAP-11618 (“Methodically Engineered, Restructured, and Improved Technical Specifications, Merits Program – Phase II Task 5, Criteria Application”, November 1987) proposed relocating a number of LCOs, including RTS, ESFAS, and Interlock functions
- WCAP-11618 applied the NRC’s Interim Policy Statement Criteria to NUREG-0452, STS for Westinghouse NSSS Plants that was applicable to all Westinghouse NSSS plants
- Generic application must be confirmed on a plant specific basis when converting to the Improved Standard Technical Specifications (ITS)
- NRC review of WCAP-11618 concluded that the majority of the LCOs could be relocated out of the TS, with some exceptions , such as RTS, ESFAS, and Interlock Functions, which should be retained in the TS

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Background (cont.)

- The NRC stated “The Policy Statement criteria should not be used as the basis for relocating specific trip functions, channels, or instruments within these LCOs”
- The TS LCOs that are relocated out of the TS to licensee control are relocated “as is” without any changes
- Therefore the plant design is not changed by relocating TS LCOs out of the TS
- The TS LCOs that are relocated out of the TS to licensee control must be changed in accordance with 10CFR50.59 to determine whether prior NRC review and approval of the change is required

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Background (cont.)

- NRC Final Policy Statement on TS Improvements issued on July 23, 1993
 - Lack of well defined criteria for what should be included in the TS resulted in several fold increase in the number of LARs
 - “In the Commission's view, this has diverted both NRC staff and licensee attention from the more important requirements in these documents to the extent that it has resulted in an adverse but unquantifiable impact on safety.”

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Background (cont.)

- NRC Final Policy Statement on TS Improvements issued on July 23, 1993 (cont.)
 - “LCOs which do not meet any of the criteria below may be proposed for removal from the Technical Specifications and relocation to licensee-controlled documents, such as the FSAR.”
 - “The following criteria delineate those constraints on design and operation of nuclear power plants that are derived from the plant safety analysis report or PSA information and that belong in the Technical Specifications in accordance with 10 CFR 50.36 and the purpose of Technical Specifications stated above.”

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Background (cont.)

TS LCO criteria contained in 10CFR50.36(c)(2)(ii):

Criterion 1. Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.

Criterion 2. A process variable, design feature, or operating restriction that is an initial condition of a DBA or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

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Background (cont.)

TS LCO Criteria contained in 10CFR50.36(c)(2)(ii):

Criterion 3. A SSC that is part of the primary success path and which functions or actuates to mitigate a DBA or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

Criterion 4. A SSC which operating experience or probabilistic risk assessment has shown to be significant to public health and safety.

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Background (cont.)

- During the development of the ITS (NUREG-1431), several LCOs were created from other LCOs contained in NUREG-0452:
 - LCO 3.3.5, “Loss of Power (LOP) Diesel Generator (DG) Start Instrumentation,” was contained in LCO 3/4.3.2, “ESFAS Instrumentation”
 - LCO 3.3.6, “Containment Purge and Exhaust Isolation Instrumentation,” LCO 3.3.7, “Control Room Emergency Filtration System Actuation Instrumentation,” and LCO 3.3.8, “Fuel Building Air Cleanup System Actuation Instrumentation,” were previously contained in LCO 3/4.3.3.1, “Radiation Monitoring Instrumentation for Plant Operations”

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Precedent

- WCAP-11394-P-A, “Methodology for the Analysis of the Dropped Rod Event,” was approved by the Staff on October 23, 1989
 - The WCAP contains a methodology that demonstrates that the DNB design basis is met following a dropped RCCA event without crediting a reactor trip associated with the dropped RCCA or for automatic power reduction associated with the dropped RCCA
 - The methodology supported the elimination of the Power Range Neutron Flux- High Negative Rate reactor trip function
 - Several Westinghouse NSSS plants have implemented this methodology and eliminated this reactor trip function from the TS

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Precedent (cont.)

- Amendment No. 45 was approved for a licensee on November 29, 1995 that relocated Function Unit 6.b, “Feedwater Isolation – Low RCS T_{avg} Coincident with a Reactor Trip,” from TS 3.3.2, ESFAS Instrumentation,” to a licensee controlled document
- The NRC safety evaluation stated, in part:
 - “The staff has concluded that the instrumentation utilized to cause feedwater isolation on low RCS T_{avg} coincident with reactor trip does not serve a primary protective function so as to warrant inclusion in the TS in accordance with the criteria of 10 CFR 50.36.”

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Precedent (cont.)

- WCAP-15981-NP-A, “Post Accident Monitoring Re-Definition for Westinghouse NSSS Plants,” was approved by the Staff on February 28, 2008
 - The WCAP contains a methodology that was applied to the LCOs in TS 3.3.3, “PAM Instrumentation,” of NUREG-1431
 - The WCAP methodology determined which PAM LCOs satisfied Criterion 3 and/or 4 of 10CFR50.36(c)(2)(ii)
 - PAM instrumentation does not satisfy Criteria 1 and 2 of 10CFR50.36(c)(2)(ii), since it does not detect RCS leakage and is not a process variable, design feature, or operating restriction that is an initial condition of a DBA or transient analysis
 - The application of the Criteria of 10CFR50.36(c)(2)(ii) resulted in the relocation of PAM LCOs from TS 3.3.3 in NUREG-1431

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Need for the Change

- The NRC approved Amendments for several licensees that revise the TS for the ESFAS Function that Starts AFW on the Trip of all MFW Pumps
 - Amendment Nos. 312 and 319 were approved for a licensee on August 29, 2008
 - Amendment No. 75 was approved for a licensee on March 4, 2009
 - Emergency Amendment No. 187 was approved for a licensee on March 5, 2010

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Need for the Change (cont.)

- The NRC SE for Emergency Amendment No. 187 stated:
 - “The auto-start of AFW on loss of MFW is **an anticipatory safety function** needed to mitigate the operational impact of loss-of-feedwater events. The **AFW start from the loss of MFW pumps is not a requirement in the licensee's design basis event analyses**. The design basis events that impose AFW safety function requirements are loss of normal feedwater, main feed line or main steam line break, LOOP, and small break loss-of-coolant accident. These **design basis events assume auto-start of the AFW system in the event of a LOOP, a safety-injection (SI) signal, or low-low SG water level**. Therefore, even though the auto-start of MDAFW pumps upon an MFW pump trip is an ESFAS function in TS Table 3.3.2-1, Function 6.g, the function is an anticipatory start signal and no credit is taken in any of the licensee's safety analysis described in its USAR.”

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Need for the Change (cont.)

- The NRC approved Amendment No.194 for a licensee on March 30, 2011 that revised the TS for ESFAS Interlock; Reactor Trip, P-4
- The NRC SE for Amendment No. 194 stated:
- “The proposed footnote (m) to Function 8.a in TS Table 3.3.2-1 includes removing out of the TSs the following functions (referred as the "Subject functions"): (1) the P-4 function of transfer of the steam dump system to the plant trip controller in MODES 1, 2, and 3, (2) the P-4 turbine trip function in MODE 3, and (3) the P-4 feedwater isolation function in MODE 3.... Based on the above, the NRC staff concludes that the existing LCO and related surveillance requirement associated with the "subject functions" do not satisfy any of the criteria in 10CFR50.36(c)(2)(ii). Therefore, the proposed removal of the "subject functions" out of the TSs does not violate the 10 CFR 50.36(c)(2)(ii) requirements and is acceptable.”

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Benefits of the Change

- Reductions in the number of LARs submitted
 - Reduce the burden on licensees in the preparation of LARs
 - Reduce the burden on the Staff to review the LARs
- Reductions in potential TS violations
- Reductions in potential Notices of Enforcement Discretion
- Elimination of potential plant shutdowns required by the TS
- Elimination of LERs (10CFR50.73)

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Summary of the March 2, 2011 PWROG/NRC Meeting

- The Staff stated that Criterion 3 also includes issues such as defense-in-depth and is not solely limited to the FSAR Chapter 6 and 15 analyses assumptions, and that they expected to see defense-in-depth addressed in the submittal
- The Staff stated that Criterion 4 also includes “Operating Experience” and is not limited to PRA. The Staff also stated that Criterion 4 did not add any functions to TS 3.3.1 or TS 3.3.2.
- The Staff stated that either of the two proposed PRA approaches to address Criterion 4 as discussed on Slides 26 and 27 would be acceptable to address Criterion 4

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the Criteria of 10CFR50.36(c)(2)(ii)

**Summary of the March 2, 2011 PWROG/NRC Meeting
(cont.)**

- The Staff recommended that Luminant Power have a meeting with the Comanche Peak NRC Project Manager prior to submitting the LAR to obtain feedback on his expectations and also so that Staff review resources can be identified
- The Staff needs to resolve the potential Policy Issue related to relocating individual RTS and ESFAS instrumentation functions from the TS

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Overall Approach

- Step 1: Meet with the NRC to discuss the program.
- Step 2a: Review plant safety analysis to identify the RTS and ESFAS functions that satisfy Criterion 3.
- Step 2b: Review the plant PRA model to identify which RTS and ESFAS functions are credited that satisfy Criterion 4.
- Step 2c: Review RI applications that have resulted in changes to the plant's licensing basis that credited RTS and ESFAS functions that satisfy Criterion 4.
- Step 3: Identify the RTS and ESFAS functions that do not satisfy Criteria 3 & 4.
- Step 4: Prepare a LAR to propose the relocation of the RTS and ESFAS functions that do not satisfy Criteria 3 & 4.
- Step 5: NRC Review Activities

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Overall Approach (cont.)

- Comanche Peak is the Lead Plant to facilitate the NRC's review
- Multi-step process – discussed on the following slides
- Initially apply the process to a W NSSS plant. Then apply it to CE and B&W NSSS lead plant
- Plant specific applications of the Criterion of 10 CFR 50.36(c)(2)(ii) following this approach will be submitted after NRC approval of the Lead Plant LAR

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Step 2a: Review the Safety Analyses

- Review the Comanche Peak Chapter 6 and 15 safety analyses
- Identify the primary RTS and ESFAS functions credited
- Any function that is not a primary function that is credited in the Chapter 6 and 15 safety analyses is a backup function, which does not satisfy Criterion 3

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Step 2b: Assess PRA Model Requirements

- Review the Comanche Peak PRA model
- Typically plant PRA models do not model specific RTS/ESFAS functions for each event, but use representative functions
 - Quantitative function information (risk related) is not available
 - Therefore two qualitative approaches will be used

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Step 2b: Assess PRA Model Requirements (cont.)

- First Approach
 - Identify the RTS and ESFAS functions credited explicitly or implicitly for each event considered in the PRA model
 - Identify those events that credit a backup function for RT and ESF actuation and the backup function
 - Primary and backup RTS and ESFAS functions identified satisfy Criterion 4
 - Any functions that are not credited as a primary or backup function do not satisfy Criterion 4

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Step 2b: Assess PRA Model Requirements (cont.)

- Second Approach
 - Applicable to primarily RT signals and ATWS risk
 - Consider a product of IE frequency and signal unavailability
 - For higher frequency events, diverse signals and OA backup are required
 - For low frequency events, diverse signals or OA backup may not be necessary

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Step 2c: Assess PRA Applications Requirements

- Review the implementation of plant specific and generic Risk-Informed applications that are included in the Comanche Peak Licensing Basis
 - Are the functions that were credited important to the results?
 - Are backup functions credited to obtain acceptable results?
- Identify the RTS and ESFAS primary and backup functions credited for each event considered in the Risk-Informed application implemented
- Key Risk-Informed applications are those that resulted in changes to TS 3.3.1 and 3.3.2

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Step 2c: Assess PRA Applications Requirements (cont.)

- Primary and backup RTS and ESFAS functions satisfy Criterion 4
- Any RTS or ESFAS functions that are not credited as primary or backup do not satisfy Criterion 4

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Step 3: Identify RTS and ESFAS Functions that do not Satisfy Criteria 3 or 4

- Summarize the information obtained from Steps 2a, 2b, and 2c
- For each TS 3.3.1 and 3.3.2 function, identify if it is credited for event mitigation
- Primary RTS and ESFAS functions credited in the safety analyses satisfy Criterion 3
- Primary and backup RTS and ESFAS functions credited in the PRA and Risk-Informed applications satisfy Criteria 4
- Primary and backup RTS and ESFAS functions not credited in the PRA or Risk-Informed applications are candidates for re-location out of the TS

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Step 4: Prepare Comanche Peak License Amendment Request

- Propose to relocate TS 3.3.1 and 3.3.2 functions that do not satisfy Criteria 3 or 4 out of the TS to licensee control
- Include technical justification that concludes the identified RTS and ESFAS functions can be re-located out of the TS to licensee control

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Step 4: Prepare Comanche Peak License Amendment Request (cont.)

- Preliminary unverified RTS and ESFAS Functions to be relocated out of the TS to licensee control:
 - RTS Function 16. a., Turbine Trip on Low Fluid Oil Pressure
 - RTS Function 16. b., Turbine Trip on Turbine Stop Valve Closure
 - ESFAS Function 6. e., AFW Start on Loss of Offsite Power
 - ESFAS Function 6. g., AFW Start on Trip of all Main Feedwater Pumps
 - Application of the Criteria of 10CFR50.36(c)(2)(ii) to the RTS and ESFAS Interlocks is being finalized

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Step 5: NRC Review of Lead Plant LAR

- Respond to NRC's Requests for Additional Information
- Interface with the NRC

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the Criteria of 10CFR50.36(c)(2)(ii)

Project Schedule

Task	Start	End
Kickoff meeting with Luminant	10/26/2010	
Meeting with the NRC	3/02/2011	
Review RTS and ESFAS Functions and Identify those Functions that do not Satisfy Criterion 3 or 4	1/01/2011	12/31/11
Prepare Comanche Peak LAR	1/2/2012	3/31/12
NRC Review Activities	4/1/2012	3/31/13

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Other Options Considered

- RITSTF Initiative 4b; Extend the Completion Time out to a Maximum Backstop of 30 Days
 - Only addresses the Completion Time for one inoperable channel, LCO 3.0.3 must be entered for more than one inoperable channel, requires a power reduction or unit shutdown, and does not address reportability
- RITSTF Initiative 5b; Relocate Surveillance Frequencies to a SFCP
 - Only addresses changes to the Surveillance Frequency, a power reduction or unit shutdown is still required, and does not address reportability

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Other Options Considered (cont.)

- TSTF-493 Option B; Relocate Setpoints to a SCP
 - Only addresses changes to the Setpoints, not all plants will adopt Option B, a power reduction or unit shutdown is still required, and does not address reportability
- Relocating the TS 3.3.1 and 3.3.2 Functions that do not satisfy any of the Criteria of 10CFR50.36(c)(2)(ii) out of the TS to licensee control is consistent with the Regulations and the above changes could be made in accordance with 10CFR50.59 instead of 10CFR50.90

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Summary and Conclusions

- The Criteria of 10CFR50.36(c)(2)(ii) can be applied to individual LCOs (Functions) in TS 3.3.1 and 3.3.2
- The Staff has reviewed and approved previous applications of the Criteria to LCOs (Functions) in TS 3.3.1 and 3.3.2
- The proposed TS changes are consistent with the NRC's Final Policy Statement on TS Improvements
- The proposed changes will result in a burden reduction on both licensee and Staff resources

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the Criteria of 10CFR50.36(c)(2)(ii)

Summary and Conclusions (cont.)

- The TS LCOs that are relocated out of the TS to licensee control are relocated “as is” without any changes
- Therefore the plant design is not changed by relocating TS LCOs out of the TS
- Since the RTS and ESFAS design is not being changed, compliance with 10CFR50.55(h), IEEE Std. 279-1971, IEEE Std. 603-1991, as applicable, and 10CFR50, Appendix A is not impacted

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Summary and Conclusions (cont.)

- Diversity and Defense-in-Depth are not impacted by relocating the RTS and ESFAS Functions out of the TS to licensee control
- The TS LCOs that are relocated out of the TS to licensee control must be changed in accordance with 10CFR50.59 to determine whether prior NRC review and approval of the change is required

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Comments and Open Discussion