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Subject: Questions on Flooding TI 2515/187
Date: Friday, June 29, 2012 1:35:52 PM

Chris, Ed;

I read the TI 2515/187 and have a couple of questions on interpretation. If you have a minute, please let me know how you interpret the following.

- Section 3.02 a.1 of the TI contains a list of things that are supposed to be in the walkdown packages. I do not think that all walkdown packages will contain these items. Section 5.2 of NEI 12-07 states that the items in the TI list should be considered in preparing the package, not contained within it. I do not think our guidance is specific on what should be included in the walkdown package.
- Section 3.02 c.2 of the TI describes expected licensee actions for low APMs with significant consequences. It lists the following three items in a parenthetical note: "(implement any appropriate compensatory measures to increased margin; place the issue in its CAP; and resolve the issue as part of its response to NTTF 2.1)". My comment is that implementation of any compensatory measures and resolution of the issue will happen only after the item is placed in CAP and the CAP process determines that the margin is indeed small and the consequences are in fact significant. The order of the list in parenthesis may be misleading.
- Enclosure 1 of the TI, last sentence in the last paragraph states: "In addition, issues identified in response to item 2.g that could challenge risk significant equipment and the licensee's ability to mitigate the consequences will be subject to additional NRC evaluation." My concern is that this statement is far broader and different than the NEI 12-07 guidance for small APMs; specifically the TI guidance refers to 2.g issues that "challenge risk significant equipment", while NEI 12-07 refers to small APMs that could cause a loss of safety function. There are a lot of issues that could challenge risk significant equipment but will not cause a loss of safety function; a licensee should not be expected to take any actions for the components captured by the TI statement that are not also captured by the NEI 12-07 guidance. I suspect that the statement in the TI is a gateway to the "audit" process that I heard about yesterday. If so, the TI guidance is not consistent with NEI 12-07 and may cause confusion with respect to expected licensee actions.

Any thoughts on the above?

Thanks for your consideration and time.

Jim Riley

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