

Libby, Earl

From: AUSTGEN, Kati <kra@nei.org>
Sent: Thursday, March 27, 2014 4:08 PM
To: Libby, Earl
Subject: RE: NEI 96-07 Appendix C Errata Change Request
Attachments: NEI 96-07 Appendix C Revision 0 - Corrected.pdf; NEI 96-07 Appendix C Revision 0 - Corrected [redline].doc

Categories: Red Category

Hi Earl,

Thank you for the catches on the errata. We have incorporated all of the changes with one modification and one exception. In Section 4.3.5, we have deleted the last bullet and replaced it with an example provided by NRC staff. We have not incorporated the suggested change in Section 4.4.3.1 regarding PRA information. NEI 96-07, Appendix C, properly reflects the regulatory requirements for changes to PRA information and the need to update FSAR Chapter 19 if there are changes to the PRA summary or results presented therein. We believe that the suggested change goes beyond the requirements of 10 CFR 50.71(e) & (h) and is unnecessary in light of licensee configuration management processes, which include consideration of the PRA. We are open to considering the need for additional guidance regarding the update of PRA information in the FSAR in the context of a revision to existing guidance for updating the FSAR. NEI is already considering a revision to NEI 98-03, Guidelines for Updating Final Safety Analysis Reports, to provide guidance for combined license holders.

Please find NEI 96-07, Appendix C, Rev. 0 – Corrected attached.

Thank you,
Kati Austgen
Project Manager, New Plant Licensing

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From: Libby, Earl [<mailto:Earl.Libby@nrc.gov>]
Sent: Tuesday, February 25, 2014 5:30 PM
To: AUSTGEN, Kati
Cc: McGovern, Denise; Joshi, Ravindra; Ayegbusi, Odunayo; Scarbrough, Thomas; Terao, David; Spencer, Michael; Wilson, Anthony
Subject: NEI 96-07 Appendix C Errata Change Request

Good afternoon Kati,

I have a few errata type changes on NEI 96-07 App C for your consideration.

Page C-1 – page number is vii, continued from the EXECUTIVE SUMMARY and the TABLE OF CONTENTS

Page C-8 – 1.4 second paragraph – The change processes for ~~new plant applicants and~~ licensees under Part 52 include the Section VIII change and departure process of the applicable design certification rule, 10 CFR 50.59, and other applicable Part 50 change processes, as identified in 10 CFR 52.98. References to 10 CFR 52.98 in this appendix is a reference to new plant/Part 52 change processes collectively.

10 CFR 52.98 is the finality of the combined license after issuance, not really applicable to the license application itself.

Section 4.3.5 Changes to Operational Requirements

Page C-40 – Last bullet – ~~If a COL holder desires to use a subsequently issued ASME code case for IST that has NOT been endorsed by the NRC, such a change constitutes a change to an operational requirement in the UFSAR and must be evaluated in accordance with 10 CFR 50.59.~~

Please strike entire bullet. This example is not necessary to accurately convey the application of the Part 52 change processes to the operational requirements.

4.4.3.1 Changes to Probabilistic Risk Assessment (PRA) Information

Page C-64 – Last paragraph

To the extent that changes in the PRA information are attributed to changes in design or procedures, described elsewhere within the FSAR, the applicable change process should be followed for such changes/departures (including, as necessary, requesting NRC approval for the change). ~~The licensee must review the modification in accordance with the change processes described in Section 4.1 and 4.2 and update the FSAR as necessary at the next required update. This update to the FSAR must acknowledge in Chapter 19 the differences between the changed design and the design on which the PRA was based, including a specific description of these differences.~~ As a general matter, it is expected that any change that significantly impacts the results of the PRA (e.g., a significant design change) would be subject to the other change control processes discussed in Section 4.2.2 above. For example, Tier 1 of the plant-specific DCD ...

Addition within the text portion what was previously stated in the bulleted portion on the same page (C-64 first three bullets).

4.4.4 Departures from Tier 2* Information

Page C-68 – First Paragraph

Tier 2* information is identified with italicized text or brackets and an asterisk in the generic DCD, and is carried over into the plant-specific DCD if the applicant or licensee incorporates the DCD by reference into its UFSAR. Section VIII.B.6 of Part 52 design certification rules addresses the requirements for departures from Tier 2* information. All departures from Tier 2* information require **prior** NRC approval, but some Tier 2* matters revert to Tier 2 status after the plant first achieves full power and are then subject to the departure provisions in Section VIII.B.5.

Addition of the word prior to establish the sequence.

4.7.1 Evaluations performed during construction (before the 10 CFR 52.103(g) finding)

Page – C-71 – Third paragraph in this section

Licensees ~~should~~ **may** discuss planned changes/departures with the NRC staff prior to submittal of Preliminary Amendment Requests (PARs)/ LARs/exemption requests.

Express this idea in a conditional statement rather than an expectation.

Page C-74 – First full paragraph

A template for submittal of PAR requests by licensees is provided at the end of this section. PAR requests should be submitted to the Office of New Reactors in accordance with **DC**/COL-ISG-025.

Correct labeling on the ISG.

Thank you for your consideration of these errata type changes for incorporation in the NEI 96-07 Appendix C R00.

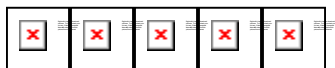
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