

DATE

TSTF-14-09
PROJ0753

Attn: Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: Clarification of Information Needed from Licensees Adopting TSTF-425, Revision 3, "Relocate Surveillance Frequencies to Licensee Control - RITSTF Initiative 5b"

REFERENCE: Federal Register, Notice of Availability of Technical Specification Improvement To Relocate Surveillance Frequencies to Licensee Control - Risk-Informed Technical Specification Task Force (RITSTF) Initiative 5b, Technical Specification Task Force-425, Revision 3, dated July 6, 2009.

Dear Sir or Madam:

The TSTF wishes to clarify the NRC submittal requirements for licensees adopting TSTF Traveler TSTF-425, Revision 3, "Relocate Surveillance Frequencies to Licensee Control - RITSTF Initiative 5b." Recent NRC Requests for Information (RAIs) sent to licensees have stated that the NRC is reviewing the licensee's application against Revision 2 of Regulatory Guide (RG) 1.200, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities." However, the model Safety Evaluation published in the referenced Federal Register Notice of Availability was based on a licensee demonstrating the technical adequacy of their PRA against Revision 1 of RG 1.200. This difference has resulted in protracted NRC reviews and a disincentive to licensee adoption of TSTF-425.

Background

In the referenced Federal Register Notice (FRN), the NRC announced the availability for adoption by licensees TSTF Traveler TSTF-425, Revision 3, "Relocate Surveillance Frequencies to Licensee Control - RITSTF Initiative 5b." The FRN states that each licensee applying for the changes proposed in TSTF-425 must include documentation regarding the probabilistic risk assessment (PRA) technical adequacy consistent with the guidance in Section 4.2 of Regulatory Guide (RG) 1.200, Revision 1, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment [PRA] Results for Risk-Informed Activities" (ADAMS Accession No. ML070240001).

The FRN included a model application, developed by the NRC staff, to be used by licensees when requesting adoption of TSTF-425, Revision 3. The model application requires licensees to include documentation with regard to PRA technical adequacy consistent with the requirements of Regulatory Guide 1.200, Revision 1, Section 4.2, and to describe any PRA models without NRC-endorsed standards.

The FRN included a model Safety Evaluation to be used by NRC staff for licensee requests to adopt TSTF-425. Under, "Scope of the PRA," the model Safety Evaluation states, "[Licensee] is required to evaluate each proposed change to a relocated surveillance frequency using the guidance contained in NEI 04-10, Rev. 1, to determine its potential impact on risk, due to impacts from internal events, fires, seismic, other external events, and from shutdown conditions."

The Technical Specification Surveillance Frequency Control Program (SFCP) implemented by licensees under TSTF-425 requires Surveillance Frequency changes to be made following the guidance in NEI 04-10, Revision 1, "Risk-informed Technical Specifications Initiative 5B, Risk-Informed Method for Control of Surveillance Frequencies," which was approved by the NRC on September 19, 2007 (ADAMS Accession No. ML072570267). NEI 04-10, Revision 1, states in multiple locations that external event risk and shutdown considerations will be addressed through quantitative or qualitative means. NEI 04-10, Revision 1, Step 5, "RG 1.200 PRA Technical Adequacy," states, "Plants implementing TSTF-425 shall evaluate their PRAs in accordance with this regulatory guide," which is Revision 1 of Regulatory Guide 1.200. Therefore, the licensee Technical Specifications require licensees to follow NEI 04-10, Revision 1, which requires licensees to evaluate their PRA in accordance with Regulatory Guide 1.200, Revision 1.

RG 1.200, Revision 2, which became effective in 2010 (subsequent to NRC approval of NEI 04-10 and TSTF-425), endorsed a revision to the PRA standard which combined new requirements for PRA models for external hazards, including fire and seismic hazards, with the existing internal events PRA standard. NEI 04-010, Rev. 1, does not require external hazards, including fire and seismic events, to be assessed quantitatively using PRA models, instead providing for qualitative and other quantitative methods to be used. Therefore, licensees adopting TSTF-425 and proposing to use these endorsed methods to assess external hazards would not submit any information on external hazard PRA models, since such models would not be used for this application.

The TSTF notes that some editorial revisions and clarifications to the internal events PRA standard were also included in the new combined standard, and the NRC, in RG 1.200, Revision 2, endorsed this revised standard and did not identify any exceptions. Since there are no substantive technical changes to the internal events PRA standard, licensees who submit PRA quality information for their internal events PRA based on RG 1.200, Revision 1, also conform to RG 1.200, Revision 2, for the internal events PRA.

At the July 10, 2014 TSTF/NRC public meeting, the NRC staff stated that licensees requesting adoption of TSTF-425 may address external events using either of two methods:

- A qualitative or quantitative evaluation of risk as described in NEI 04-10, Revision 1, or
- A quantitative evaluation using a PRA endorsed in RG 1.200, Revision 2.

The NRC staff stated that a licensee should describe in their application which method is being used to address external events.

Proposed Resolution

The TSTF proposes the following actions regarding submittal of license amendment requests to adopt TSTF-425:

1. Licensees using qualitative or quantitative methods to evaluate external events or fire risk in accordance with NEI 04-10, Revision 1, should identify that fact in their submittal. Such submittals would not use RG 1.200 to support the technical adequacy of the methods, consistent with NRC staff positions.
2. Licensees proposing to use a quantitative method of evaluating external events or fire risk using an NRC approved method referenced in RG 1.200, Revision 2, should identify that fact in their submittal, and include appropriate information for NRC review in accordance with Section 4.2 of RG 1.200, Revision 2, for the applicable PRA models.

If this approach is acceptable, please notify us and we will notify licensees to follow this guidance. Otherwise, please contact us so that we may determine an appropriate approach.

Should you have any questions, please do not hesitate to contact us.

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Enclosure

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