

## NRR-PMDAPEm Resource

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**From:** Mozafari, Brenda  
**Sent:** Tuesday, June 16, 2015 3:11 PM  
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**Cc:** David.Gudger@exeloncorp.com  
**Subject:** Draft Request for additional information regarding TSTF-425, rev3

On November 19, 2014, Nine Mile point The proposed amendment would modify the Nine Mile Point (NMP) Nuclear Station, Unit 2 Technical Specifications (TS) by relocating specific surveillance frequencies to a licensee-controlled program with the adoption of Technical Specification Task Force (TSTF) -425, Revision 3, "Relocate Surveillance Frequencies to Licensee Control - Risk Informed Technical Specification Task Force (RITSTF) Initiative 5b." The licensee's application dated November 19, 2014, Attachment 1, Section 2.2, has identified some variations or deviations from the TSTF-425.

Based on our review of the request, we have identified areas where additional information is needed to complete our review. The Draft request for additional information (RAI) is provided in this email, would add a new program, the Surveillance Frequency Control Program, to TS Section 5, Administrative Controls.

REQUEST FOR ADDITIONAL INFORMATION TO SUPPORT  
REVIEW OF NINE MILE POINT NUCLEAR STATION UNIT 2  
ADOPTION OF TECHNICAL SPECIFICATION TASK FORCE-425  
RELOCATION OF SPECIFIC SURVEILLANCE FREQUENCY REQUIREMENTS  
TO A LICENSEE CONTROLLED PROGRAM (TAC NOS. MF5364)

- PRA RAI 1. In Attachment 2, Section 2.5 "References," of the License Amendment Request (LAR), the licensee provides references that suggest the July 2009 peer review was performed using ASME RA-Sc-2007, "Addenda to ASME RA-S-2002 Standard for Probabilistic Risk Assessment [PRA] for Nuclear Power Plant Applications." The staff would like to clarify that Regulatory Guide 1.200, Revision 2, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities" (ML090410014), provides clarification to ASME/ANS RA-Sa-2009 on providing a technically adequate PRA. Furthermore, consistent with the information provided in Regulatory Issue Summary (RIS) 2007-06 (ADAMS Accession No. ML070650428), "Regulatory Guide 1.200 Implementation," the NRC staff will use Revision 2 of RG 1.200 (ADAMS Accession No. ML090410014) to assess technical adequacy of the PRA used to support risk-informed applications received after March 2010. If the licensee did not use ASME/ANS RA-Sa-2009, "Addenda to ASME/ANS RA-S-2008 Standard for Level 1/Large Early Release Frequency Probabilistic Risk Assessment for Nuclear Power Plant Applications," then they would need to perform a gap analysis for the differences in revisions and provide the applicable Facts and Observations (F&Os) of that gap analysis.
- a. Explain whether the peer review was performed to ASME/ANS RA-Sa-2009 as clarified by RG 1.200 Revision 2.
- PRA RAI 2. The licensee stated that its PRA model update to meet Regulatory Guide (RG) 1.200 was completed and peer reviewed in July 2009. The licensee further stated that the peer review resulted in "18 findings which did not meeting Capability Category (CC) II and 34 suggestions that met CCII." The licensee also provided Table 2-1 which lists six open findings that have yet to be resolved per the licensee's update process. As discussed in RG 1.200, Revision 2, Regulatory Position 4.2, the licensee should provide discussion regarding the resolution of the peer review findings and observations that are applicable to the parts of the PRA required for the application.

- a. If the July 2009 peer review was performed using ASME/ANS RA-Sa-2009, then provide all the applicable findings and suggestions resulting from the 2009 peer review, their disposition, and the potential impact on the Risk-Informed Surveillance Test Interval (RI STI) application. If the peer review was not performed using ASME/ANS RA-Sa-2009, then provide the applicable findings and suggestions resulting from the gap analysis as mentioned in PRA RAI 1, their disposition, and the potential impact on the RI STI application.

PRA RAI 3. The LAR does not provide a discussion or description of any low-power or shutdown events. A qualitative analysis of shutdown events is acceptable, as presented in the NRC-endorsed document NEI 04-10, Revision 1. Step 10 of Section 4.0 of NEI 04-10, Revision 1, provides guidance on the initial assessment of Internal Events, External Events, and Shutdown Events. Describe how shutdown events will be assessed as part of the Nine Mile Point, Unit 2, Surveillance Frequency Control Program.

Once you have had time to review the question let me know if further clarification is need and I can arrange a clarification call. The expected response is 30 days from the date of this email. The response should repeat the questions for completeness.

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**Hearing Identifier:** NRR\_PMDA  
**Email Number:** 2152

**Mail Envelope Properties** (Brenda.Mozafari@nrc.gov20150616151000)

**Subject:** Draft Request for additional information regarding TSTF-425, rev3  
**Sent Date:** 6/16/2015 3:10:47 PM  
**Received Date:** 6/16/2015 3:10:00 PM  
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<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	4966	6/16/2015 3:10:00 PM

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**Reply Requested:** No

**Sensitivity:** Normal

**Expiration Date:**

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