NRR-PMDAPEm Resource

From: Singal, Balwant
Sent: Wednesday, August 12, 2015 3:54 PM
To: 'Williams, Lisa L.'
Cc: James, Lois
Subject: Request for Additional Information - License Amendment Request for Adoption of TSTF-425, Revision , Columbia Generating Station - TAC No. MF6042
Attachments: MF6042-APLA-RAI-TS.docx

Lisa,

By letter dated March 17, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15093A178), Energy Northwest (the licensee) submitted License Amendment Request (LAR) for adoption of TSTF-425, Revision 3, "Relocate Surveillance Frequencies to Licensee Control – RITSTF [Risk Informed Technical Specification Task Force] Initiative 5b," (ADAMS Accession No. ML090850642) for Columbia Generating Station (CGS).

The NRC staff's Probabilistic Risk Assessment Licensing Branch (APLA) has completed its initial review of the licensee's proposed technical specification changes for its CGS related to adoption of Technical Specification Task Force-425, Revision 3. Based on our review, the NRC staff has identified the attached request for additional information (RAI) for completing its review.

Draft RAI were transmitted via e-mail on August 10, 2015 and a clarification call was held on August 12, 2015. Sandra Christianson of Energy Northwest agreed to provide the RAI response within 30 days from the date of this e-mail. Please treat this e-mail as formal transmittal of RAI.

Please note that the NRC staff may issue additional RAI after initial review of your application by the Technical Specification branch.

Thanks.

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Recipients:
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Tracking Status: None
"'Williams, Lisa L.'" <llwilliams@energy-northwest.com>
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REQUEST FOR ADDITIONAL INFORMATION RELATED TO AN AMENDMENT
TO ADOPTTECHNICAL SPECIFICATIONS TASK FORCE (TSTF) TRAVELLER TSTF-425
TO RELOCATE SPECIFIC SURVEILLANCE FREQUENCIES TO A
LICENSEE CONTROLLED PROGRAM
COLUMBIA GENERATING STATION
DOCKET NO. 50-397

By letter dated March 17, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15093A178), Energy Northwest (the licensee) submitted License Amendment Request (LAR) for adoption of TSTF-425, Revision 3, "Relocate Surveillance Frequencies to Licensee Control – RITSTF [Risk Informed Technical Specification Task Force] Initiative 5b,"(ADAMS Accession No. ML090850642) for Columbia Generating Station (CGS).

The NRC staff's Probabilistic Risk Assessment Licensing Branch (APLA) has completed its initial review of the licensee's proposed technical specification changes for its CGS related to adoption of Technical Specification Task Force-425, Revision 3. Based on our review, the NRC staff has identified the following request for additional information for completing its review.

Request for Additional Information (RAI) for APLA:

1. The LAR mentions a number of peer reviews and a self-assessment:

   - A peer review had been performed in 2004.
   - A peer review had been performed in 2009 and a report issued in January 2010. Findings and Observations (F&Os) included those graded as capability category I (CCI) or not met.
   - A self-assessment had been performed.
   - A Fire Probabilistic Risk Assessment (PRA) peer review had been performed.

   a. Please clarify which peer reviews (internal events PRA, Fire PRA, or other PRA) were full scope or focused scope, discuss the peer review guidance, standards, and regulatory guidance followed, and confirm the reviews were conducted consistent with applicable guidance and standards.Please clarify whether the internal events PRA was reviewed to the Addenda to American Society of Mechanical Engineers/American Nuclear Society (ASME/ANS) RA-S-2008 (i.e., ASME-ANS RA-Sa-2009). If reviews were not conducted consistent with applicable guidance and standards, please describe your plans to address any shortcomings in the review. With regard to the self-assessment, please describe when this was performed and the scope of the self-assessment, and whether it included a gap assessment between Regulatory Guide (RG) 1.200, Revision 1,"An Approach for Determining the Technical Adequacy of a Probabilistic Risk Assessment Results for Risk-Informed Activities," (ADAMS Accession No. ML070240001) and RG 1.200, Revision 2 (ADAMS Accession No. ML090410014), for the internal events PRA. Please also

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provide additional information on the Fire PRA peer review describing when it was performed and what the peer review entailed.

b. Please provide the internal events PRA (including flooding) F&Os graded as CCI or not met and describe your disposition of these F&Os from the 2009 peer review and self assessment.

c. If PRA models other than the internal events PRA model are used for detailed quantitative analysis versus for qualitative or bounding analyses, then please address the technical adequacy guidance of RG 1.200, Revision 2. If the LAR is requesting to use these PRA models as such, provide the F&Os graded as CCI or not met and describe your disposition of these F&Os from the peer reviews.

2. The LAR indicates that PRA models other than the internal events PRA model may be used. Please confirm that these PRA models reflect the current plant configuration and operation. If this is not the case, please explain how the PRA models support the application, using Nuclear Energy Institute (NEI) 04-10, Revision 1, "Risk-Informed Technical Specifications Initiative 5b, Risk-Informed method for Control of Surveillance Frequencies," April 2007(ADAMS Accession No. ML071360456) guidance, and whether current plant configuration and operation is considered in their use.

3. The impact of the open F&O for supporting requirement (SR) SY-A4 states that sensitivity analysis will be performed. It is not clear how a sensitivity analysis could be defined to address the lack of documented interviews that confirm that system analyses represent the as-built, as-operated plant. The TSTF-425 program considers capability category II for the internal events PRA model; therefore, please address this F&O to meet capability category II and provide the disposition of the F&O.

4. The peer review F&O on SR DA-C6 is related to meeting the data requirements for standby components (SR DA-C6) as well as for surveillance requirements (SR DA-C7). The F&O states: "Estimates based on the surveillance tests and maintenance acts as described in DA-C6 and DA-C7 should be performed for significant components whose data are not tracked in the MSPI data." SR DA-C6 andSR DA-C7 include consideration of plant-specific data. Please explain the basis for concluding thatthe proposed sensitivity analyses, which are based on generic data, are considered bounding if these two SRs are graded at not met or capability category I. If use of plant-specific data consistent with SR DA-C6 and SR DA-C7 cannot be demonstrated to be bounding with respect to the proposed method to perform sensitivity analyses for relevant components, then please complete the work to meet SR DA-C6 and SR DA-C7 provide the disposition of the F&O.

5. Do the failure probabilities of structures, systems, and components modeled in the CGS internal events PRA include a standby time-related contribution and a cyclic demand-related contribution? If not, please describe how standby time-related contribution is addressed for extended intervals.