

Risk-Informed Reviews TSTF-425/5b and TSTF-505/4b

January 29, 2016



TSTF-425/5b

Relocation of Surveillance Frequencies

- Relocates surveillance frequency requirements from the plant technical specifications to licensee control in accordance with the Surveillance Frequency Control Program
- Status of Reviews
 - 8 applications under review



TSTF-505/4b

Risk-Informed Completion Times (CTs)

- Risk-informed process to temporarily extend certain CTs, based on plant configuration and real-time risk calculation
- Allows the use of “PRA functionality”
- Adds new TS conditions to address multiple trains inoperable



NRC Position on PRA Functionality

Would not allow:

- **Using other SSCs to compensate for loss of TS function provided by a given system**
- **Being unable to mitigate an event that current TS are able to mitigate (e.g., LOOP/LOCA, seismic)**

With all trains of a system inoperable but one train PRA functional:

- **Safety margins must be maintained**
- **Defense in Depth must be maintained**



Challenges with 4b

PRA Functionality when all trains of a system are inoperable:

- **Most resource intensive part of the review**
- **Only applicable in very rare situations**
- **Small fraction of the benefit this program provides**
- **Many different interpretations**



Strategy for Moving Forward with 4b

- **Various NRC internal changes**
 - Established a Lead PM
 - Established an expectation to use the same primary technical reviewers to ensure consistency
- **NRC clarifying guidance on the use of “PRA Functionality” when all trains are inoperable**



Moving Forward with Risk-Informed Reviews

- **Open and consistent communication with stakeholders**
- **Periodic NRC/NEI management meetings**
 - **Established in 2012 to discuss issues requiring management attention related NFPA 805**
 - **Meeting invitees expanded to include an industry champion, and multiple NRC offices**
 - **Successfully addressed various topics including NFPA 805 review consistency, process efficiencies, PRA methods and fire research**
 - **As topics were worked through- Expanded to issues related to other ongoing risk-informed reviews**