

NRR-PMDAPEm Resource

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RAI 6

NRC Meeting

February 7, 2017

Southern Nuclear Company
Risk Informed Engineering

AGENDA

- Introduction
- Opening Remarks
- Operability Assessment and Extent of Condition Review
- Vogtle Configuration Risk Management Program 50.65 (a)(4) process
- RICT Procedure Instruction and Common Cause RMA Development
- Vogtle Process Example
- Closing Summary

TREATMENT OF CC FOR EMERGENT FAILURES

- Operability Determination and Extent of Condition Review
- 10CFR50.65 (a)(4) process (GM-031-001)
- When Common Cause RMAs required (GM-031-002)
- Common Cause RMA Development (GM-031-003)

Extent of Condition Review as input to RICT Program

- Operability assessed on an ongoing basis using latest information available
- Inoperable component requires Extent of Condition review on redundant component (10008-C)
- Extent of condition review can lead to operability determination for opposite train (NMP-AD-012)
- Initial and final extent of condition review – assess on an ongoing basis in-between

Configuration Risk Management Program 50.65 (a)(4)

- Handout – 10CFR50.65(a)(4) and RICT Processes Flowchart
- the knowledge operators have based on the operability and extent of condition processes informs their actions in EOOS
- failed components are reflected as OOS and the risk is calculated
- EOOS and procedure NMP-GM-031-002 inform when RMAs are required
- NMP-GM-031-003 directs the development and implementation of RMAs

RICT Process and RMA Development

Handouts

- Procedure NMP-GM-031-002 excerpt
 - when COMMON CAUSE RMAs are required
- Procedure NMP-GM-031-003 excerpt
 - COMMON CAUSE RMA development

RG 1.177 – Tier 1 and Tier 3 Discussion

- *The 4b process is a risk-informed TS change; however the RICT calculation more closely aligns with the CRMP and a4 on-line risk management*
- *NRC Regulatory Guide 1.177, "An Approach for Plant-Specific, Risk-Informed Decision making: Technical Specifications"*
 - *addresses common cause failure treatment for risk-informed changes to Technical Specifications.*
 - *Appendix A, Section 1.3.1.1, discusses quantitative adjustment of the common cause failure probabilities based on the cause of the equipment unavailability.*
 - *Section 2.3 of the Regulatory Guide states that Appendix A outlines issues associated with Tier 1.*
 - *Tier 1 is an assessment of the risk impact of a proposed change that is submitted to the NRC as part of a license amendment request.*
 - *Tier 2 is risk analysis done to support the TS change on avoiding risk-significant plant configurations*
 - *Tier 3, which is a contemporaneous configuration risk management risk assessment performed by the licensee while the equipment is out of service.*

RG 1.177 – Tier 1 and Tier 3 Discussion

- *The CRMP (a4 and eventually RICT) are risk monitoring tools*
 - *Use the same zero maintenance model with the plant configuration and conditions (e.g., severe weather) known*
 - *RICT is required to be re-calculated for any configuration changes*
 - *These tools calculate risk concurrent with the plant's configuration*
- *Since common cause failure quantitative adjustments are explicitly excluded from Tier 3 methods in Regulatory Guide 1.177 and since the RICT calculations are configuration risk assessments associated with Tier 3 assessments, these quantitative adjustments are not applicable to calculating a RICT.*
- *Therefore, the RICT process explicitly addresses common cause failure and mitigates the associated risk by development and implementation of RMAs specifically targeted toward common cause failure, consistent with regulatory guidance.*

QUESTIONS

Questions?