

From: Michael.Dilorenzo@aps.com
Sent: Thursday, May 16, 2019 7:51 PM
To: Lingam, Siva
Cc: O'Banion (Watford), Margaret; Thomas.N.Weber@aps.com
Subject: [External_Sender] FW: RICT NRC Draft SE Review

Siva,

APS has completed our review of the draft NRC safety evaluation for Risk-Informed Completion Times that you distributed to us on 04/25/2019. We have the following items of feedback:

- APS did not identify any proprietary information in the NRC draft SE
- Pg. 5: Section 2.2.1, center of the page has text that looks like it should be deleted
- Pg. 8: A discussion of TS 3.5.3 Required Action A.1 is omitted from the text description of the TS modifications. It is properly shown on the NRC draft SE clean TS page.
- Pg. 9: A discussion of TS 3.6.3 Required Actions C.1 and C.2 are omitted from the text description of the TS modifications. They are properly shown on the NRC draft SE clean TS page.
- Pg. 9: In TS 3.6.3 Required Action D.1, second bullet, the words "constraints are applicable" should be "constraints are applicable when there is a loss of function" to be consistent with the NRC draft SE clean TS page.
- Pg. 13: In TS 3.8.9 Required Action B.1, the words "restore vital bus" should be "restore vital instrument bus" to be consistent with the NRC draft SE clean TS page.
- Pg. 29: In Section 3.1.2.2.1.1, the words "seven physically independent circuits" should be "eight physically independent circuits". Reference our UFSAR Revision 19, Section 8.2.1
- Pg. 34: In Section 3.1.2.2.1.2, second paragraph, the words "1 out of 3 AC Sources" should be "1 out of 4 AC Sources"
- Pg. 39, the first sentence at the very top of the page (starts with "In the event...") is not a complete sentence. It looks like the word "is" is misplaced.
- The NRC draft SE alternately uses the phrasing "a RICT" and "an RICT"; The NRC might want to standardize on one or the other

We have one general thought on a subject that we discussed with Maggie on our call on Thursday, 05/16/2019. The NRC draft SE says that the license amendment is effective as of the date of issuance and shall be implemented within 180 days of the date of issuance. We have always considered the license amendment implemented when the pages go in our TS book in the control room. However, several places in Table 1-2, Additional Conditions, we use the word "implementation" in the context of using the Risk-Informed Completion Time program. For instance, we talk about certain actions with the PRA that have to be complete prior to implementation. We always thought that this would not be an issue, because we would finish the work on our PRA and update the books at the same time within the 180 day window. However, the PRA work has been intensive and there is a small chance that it will not be complete within the 180 window and we would miss our implementation date. We think one option would be to submit a letter to distinguish between updating the TS pages (implementing the license amendment) and actually using a risk-informed completion time per the RICT TS program. Another option might be to ask for more time to implement, say 270 days or a year. We would like to discuss this with you next week and explore the potential paths.

Hope your training visit to Idaho went well.

Best regards,

Mike D.

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