

From: Miller, Ed
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To: Miller, Ed
Subject: Draft License Condition for Discussion at March 11, 2020, Public Meeting
Attachments: RICT Program TS Section 5-revised-public-meeting-version.docx

Attached is the draft license condition for discussion at the March 11, 2020, public meeting on TSTF-505.

ed

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This draft Technical Specification is provided for discussion purposes only. It does not constitute a formal NRC staff position or an explicit or implicit approval of any elements the NEI proposal submitted by the Nuclear Energy Institute for staff consideration.

- e. A RICT must be calculated using [list approaches used in support of TSTF 505(e.g., Fire PRA, Seismic PRA)]. Use of other approaches requires prior NRC approval.
- f. When making changes to the models used in PRA¹, the licensee shall follow the PRA configuration control process in Regulatory Guide 1.200, Revision 3, “Acceptability of Probabilistic Risk Assessment Results for Risk-Informed Activities.”
|
- g. A licensee shall obtain a license amendment pursuant to 10 CFR 50.90 prior to implementing a RICT that uses a Newly Developed Method² if it does not meet all applicable review requirements provided in tables 1.7.2-2 through 1.7.2-7 in Rev. XX of PWROG-19027³ using the process described in Rev. 2 of NEI-17-07⁴.
- h. A report shall be submitted in accordance with Specification [5.5.19] following each PRA upgrade involving a Newly Developed Method that has not been previously reported to the NRC for a RICT program (prior to using that method in a RICT) and the associated peer review.

[5.5.19 Probabilistic Risk Assessment (PRA) Upgrade Report

A report shall be submitted following each PRA upgrade involving a Newly Developed Method that has not been previously reported to the NRC for a RICT program and the associated peer review in accordance with Specification [5.5.18]. The report shall describe the scope of the upgrade, including: (1) the models in PRAs are upgraded and newly developed methods used; (2) information relating to the acceptability of the newly-developed method, if that information has not already been provided by the method developer to NRC in accordance with guidance in NEI-17-07 Rev. 2, (3) the peer review and finding closure reports available to the NRC for oversight and inspection activities; (4) any open findings from the peer-review of implementation of the newly developed method and its disposition; and, (5) changes to key assumptions related to the newly developed method or its implementation.]

The words in this draft Tech Spec assumes that RG 1.200, when finalized, NRC will endorse PWROG-19027 and RG 1.200 without any exceptions.

¹ The definition of PRA Model is provided in RG 1.200 Rev. 3

² The definition of “newly-developed method” is provided in RG 1.200 Rev. 3

³ Provide ML# of Refer to staff endorsed version of PWRG-19027

⁴ Provide ML# of NRC endorsed NEI-17-07 version.