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**Sent:** Wednesday, March 11, 2020 7:25 AM  
**To:** Weerakkody, Sunil  
**Cc:** Victoria Anderson (vka@nei.org); Linthicum, Roy R.:(Exelon Nuclear); Cusumano, Victor; Whitman, Jennifer; Pascarelli, Robert; Reisi Fard, Mehdi; Rosenberg, Stacey; Miller, Ed  
**Subject:** [External\_Sender] Information to Support Today's Public Meeting on TSTF-505 Newly Developed Methods  
**Attachments:** TSTF-579-T,Rev0.pdf; Comparison of TSTF-579 and NRC 3-10-20 Draft.docx

Sunil,

I wanted to be sure you were aware that the TSTF and NEI provided an industry accepted TSTF Traveler to the NRC staff on January 9, 2020. The traveler captured the changes to the Risk Informed Completion Time (RICT) Program that the industry and the NRC during our series of meetings last year. A copy is attached.

To facilitate my review, I created a table that compared the TS changes in TSTF-579 to the 3/10/20 version. You may find it helpful, so I attached a copy.

Brian

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MESSAGE	855	3/11/2020 7:25:04 AM
image001.png	650	
TSTF-579-T,Rev0.pdf	842155	
Comparison of TSTF-579 and NRC 3-10-20 Draft.docx		25557

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## Technical Specifications Task Force Improved Standard Technical Specifications Change Traveler

### RICT Program Update

NUREGs Affected: ☒ 1430 ☒ 1431 ☒ 1432 ☒ 1433 ☒ 1434 ☐ 2194

Note: This "T" Traveler has been reviewed and approved by the Technical Specification Task Force and is made available as a template for plant-specific license amendments. This Traveler has not been reviewed and approved by the Nuclear Regulatory Commission.

Classification: 1) Technical Change

Recommended for CLIIP?: No

Correction or Improvement: Improvement

NRC Fee Status:

Benefit: Avoids Future Amendments

Changes Marked on ISTS Rev 4.0

PWROG RISD & PA (if applicable): None

See attached.

### Revision History

#### OG Revision 0

**Revision Status: Active**

Revision Proposed by: TSTF

Revision Description:

Original Issue

#### TSTF Review Information

TSTF Received Date: 13-Dec-19

Date Distributed for Review 13-Dec-19

TSTF Comments:

(No Comments)

TSTF Resolution: Approved for Use

Date: 09-Jan-20

### Affected Technical Specifications

5.5.21	Risk Informed Completion Time Program	NUREG(s)- 1430 1431 1432 Only
5.6.8	PRA Upgrade Report	NUREG(s)- 1430 1431 1432 Only
5.5.18	Risk Informed Completion Time Program	NUREG(s)- 1433 1434 Only
5.6.6	PRA Upgrade Report	NUREG(s)- 1433 Only
5.6.7	PRA Upgrade Report	NUREG(s)- 1434 Only

08-Jan-20



## **1. SUMMARY DESCRIPTION**

The Technical Specifications (TS) Section 5.5, "Risk Informed Completion Time Program," is revised to address incorporation of newly developed methods in probabilistic risk assessment (PRA) models used to calculate a Risk Informed Completion Time (RICT). A new report is added to TS Section 5.6, titled the "Probabilistic Risk Assessment (PRA) Upgrade Report," to inform the NRC of the use of newly developed PRA methods to calculate a RICT.

## **2. DETAILED DESCRIPTION**

### **2.1. Current Requirements**

The Risk Informed Completion Time Program (RICT Program) was added by TSTF-505, Revision 2, "Provide Risk-Informed Extended Completion Times - RITSTF Initiative 4b," (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18183A493) which was approved by the Nuclear Regulatory Commission (NRC) on November 21, 2018 (ADAMS Accession No. ML18269A041).

Paragraph e of the RICT Program, states:

The risk assessment approaches and methods shall be acceptable to the NRC. The plant PRA shall be based on the as-built, as-operated, and maintained plant; and reflect the operating experience at the plant, as specified in Regulatory Guide 1.200, Revision 2. Methods to assess the risk from extending the Completion Times must be PRA methods used to support this license amendment, or other methods approved by the NRC for generic use; and any change in the PRA methods to assess risk that are outside these approval boundaries require prior NRC approval.

### **2.2. Reason for the Proposed Change**

The current RICT Program requires prior NRC approval of change to the PRA methods used to calculate a RICT. This requirement is overly restrictive, and the term "PRA method" is not well defined and could lead to uncertainty on which PRA model changes require prior NRC approval. The industry and the NRC have developed revised TS and supporting regulatory guidance to address these issues.



### 2.3. Description of the Proposed Change

The RICT Program is Specification 5.5.21 in NUREG-1430, NUREG-1431, and NUREG-1432<sup>1</sup>, and Specification 5.5.18 in NUREG-1433 and NUREG-1434<sup>2</sup>. Paragraph e of the RICT Program is replaced with the following:

- e. A RICT must be calculated using the following PRA and non-PRA approaches approved by the NRC, including [list specific PRA and non-PRA approaches used for fire and seismic analysis (e.g., Fire PRA and Seismic Margins Analysis)]. Changes to these PRA and non-PRA approaches require prior NRC approval. The PRA maintenance and upgrade process will validate that other changes to the PRA models used in the RICT program, including changes involving newly developed methods, follow [ [ASME/ANS RA-Sa-2009, "Standard for Level 1/Large Early Release Frequency Probabilistic Risk Assessment for Nuclear Power Plant Applications," Regulatory Guide 1.200, Revision 2, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities," and NEI 17-07, Revision 2, "Performance of PRA Peer Reviews Using the ASME/ANS PRA Standard"] OR [Regulatory Guide 1.200, Revision 3, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities." ] ]

A new paragraph f is added that states:

- f. A report shall be submitted in accordance with Specification 5.6.[8] following each PRA upgrade and associated peer review involving a newly developed PRA method that has not been previously reported to the NRC for a RICT program.

A new reporting requirement is added to Section 5.6, "Reports." The new report is Specification 5.6.8 in NUREG-1430, NUREG-1431, and NUREG-1432, Specification 5.6.6 in NUREG-1433, and Specification 5.6.7 in NUREG-1434. It states:

#### 5.6.[8] Probabilistic Risk Assessment (PRA) Upgrade Report

A report shall be submitted following each PRA upgrade involving a newly developed PRA 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.[21]. The report shall describe the scope of the upgrade and shall include:

- a. The PRA models upgraded and newly developed method used;

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<sup>1</sup> NUREG-1430 provides the Standard Technical Specifications (STS) for Babcock & Wilcox plant designs. NUREG-1431 provides the STS for Westinghouse plant designs. NUREG-1432 provides the STS for Combustion Engineering plant designs.

<sup>2</sup> NUREG-1433 provides the STS for BWR/4 plant designs, but is also representative of the BWR/2, BWR/3, and, in this case, BWR/5 designs. NUREG-1434 provides the STS for the BWR/6 plant design, and is representative, in some cases, of the BWR/5 plant design.



- b. A list of the peer review and finding closure reports available to the NRC for oversight and inspection activities;
- c. Any open findings from the peer review of implementation of the newly developed method; and
- d. Changes to key assumptions related to the newly developed method or its implementation. ]

Both the RICT Program and the PRA Upgrade Report are bracketed in the Standard Technical Specifications (STS), indicating that the programs only apply to licensees that have adopted TSTF-505 by license amendment.

It is expected that licensees will incorporate these changes into a license amendment request to adopt TSTF-505, Revision 2, as a variation from the traveler. The attachment provides a recommended variation discussion to be used in the TSTF-505, Revision 2, model application.

### **3. TECHNICAL EVALUATION**

Throughout 2018 and 2019 the Nuclear Energy Institute (NEI) and the Technical Specifications Task Force (TSTF) held a series of meetings with the NRC to discuss a regulatory framework that permits the industry to upgrade plant PRAs and implement newly developed methods in a manner that is acceptable to the NRC. This includes a companion document to the American Society of Mechanical Engineers (ASME) / American Nuclear Society (ANS) PRA Standard that contains information that enables peer reviewers to evaluate newly developed methods, and a revision to Regulatory Guide 1.200 that endorses the revised ASME/ANS PRA Standard with appropriate clarifications. In addition, NEI issued NEI 17-07, Revision 2, "Performance of PRA Peer Reviews Using the ASME/ANS PRA Standard," which discusses peer review of PRA upgrades that include newly developed methods.

Changes to the TS were developed that provide flexibility for licensees to upgrade their PRA models, including newly developed methods, while providing the NRC with the ability to provide oversight. These changes permit licensees to revise their PRA models to incorporate most newly developed methods in accordance with the requirements of the ASME/ANS PRA Standard without prior NRC approval. The documents provide clear definitions of what constitutes a PRA method and what is a newly developed method (i.e., a method that has been developed separately from a state-of-practice method or that involves a fundamental change to a state-of-practice model). The PRA maintenance and upgrade process following ASME/ANS RA-Sa-2009, "Standard for Level 1/Large Early Release Frequency Probabilistic Risk Assessment for Nuclear Power Plant Applications," Regulatory Guide 1.200, Revision 2, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities," and NEI 17-07, Revision 2, will ensure that changes to the PRA models used in the RICT program, including changes involving newly developed methods, are properly evaluated. Revision 3 of Regulatory Guide 1.200 will incorporate the newly developed method companion document to the ASME/ANS Standard and NEI 17-07, Revision 2, by reference.



The proposed TS changes implement this process.

The new paragraph e states, in part:

A RICT must be calculated using the following PRA and non-PRA approaches approved by the NRC, including [list specific PRA and non-PRA approaches used for fire and seismic analysis (e.g., Fire PRA and Seismic Margins Analysis)]. Changes to these PRA and non-PRA approaches require prior NRC approval.

The industry and NRC agree that NRC prior approval is needed for a change to the fire and seismic approaches reviewed by the NRC as part of their approval of the licensee's adoption of TSTF-505. For example, if a licensee used a Seismic Margins Analysis (SMA) to justify adoption of TSTF-505 and the licensee wishes to replace the SMA with a seismic PRA model, the seismic PRA model must be reviewed and approved by the NRC for use in the RICT calculations.

Paragraph e goes on to state:

The PRA maintenance and upgrade process will validate that other changes to the PRA models used in the RICT program, including changes involving newly developed methods, follow ...

and lists two alternative descriptions of the maintenance and upgrade process:

1. ASME/ANS RA-Sa-2009, "Standard for Level 1/Large Early Release Frequency Probabilistic Risk Assessment for Nuclear Power Plant Applications," Regulatory Guide 1.200, Revision 2, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities," and NEI 17-07, Revision 2, "Performance of PRA Peer Reviews Using the ASME/ANS PRA Standard"

or

2. Regulatory Guide 1.200, Revision 3, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities."

This sentence recognizes that the ASME/ANS PRA Standard, as endorsed by Regulatory Guide 1.200, Revision 2, and as supplemented by the guidance in NEI 17-07, Revision 2, provides an appropriate mechanism for evaluating maintenance and upgrade of a licensee's PRA. NEI 17-07, Revision 2, provides the additional guidance needed to properly assess newly developed PRA methods.

Regulatory Guide 1.200, Revision 3, is still under development and is expected to be issued in the second quarter of 2020. It will incorporate directly or by reference the requirements from the endorsed ASME/ANS Standard companion document for newly developed methods, Regulatory Guide 1.200, Revision 2, and NEI 17-07, Revision 2. Once Regulatory Guide 1.200, Revision 3, is issued, it will be the preferred reference.



The new paragraph f states:

A report shall be submitted in accordance with Specification 5.6.[8] following each PRA upgrade and associated peer review involving a newly developed PRA method that has not been previously reported to the NRC for a RICT program.

Paragraph f requires submittal of a report to the NRC following a PRA upgrade and associated peer review that includes newly developed PRA methods. This notifies the NRC of the use of newly developed methods in the RICT Program and provides an opportunity for the NRC to inspect the change. Methods that have been previously reported to the NRC for use in a RICT Program need not be reported as the NRC has had the opportunity to inspect the use of those methods.

The PRA Upgrade Report in TS Section 5.6 states:

A report shall be submitted following each PRA upgrade involving a newly developed PRA 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.[21]. The report shall describe the scope of the upgrade and shall include:

- a. The PRA models upgraded and newly developed method used;
- b. A list of the peer review and finding closure reports available to the NRC for oversight and inspection activities;
- c. Any open findings from the peer review of implementation of the newly developed method; and
- d. Changes to key assumptions related to the newly developed method or its implementation. ]

The report is only required to be submitted following a PRA upgrade involving newly developed PRA methods that have not been previously reported to the NRC. PRA upgrades that do not involve newly developed methods follow the process described in the ASME/ANS PRA Standard and companion document as endorsed by Regulatory Guide 1.200.

There is no specific time frame to submit report, except that it is not required until after the peer review of the PRA upgrade is completed.

The report describes the upgrade including the PRA models that are upgraded and the newly developed methods that were incorporated. The report also includes a list of documents available for NRC inspection at the licensee site, such as the peer review report and finding closure reports. If there are any open findings from the peer review of the implementation of the newly developed method, those are to be described. Further, any key assumptions related to the newly developed method or its implementation are described in the report.



#### **4. REGULATORY EVALUATION**

The regulatory evaluation, regulatory analysis, No Significant Hazards Consideration Analysis, and Environmental Considerations in TSTF-505, Revision 2, are not affected by incorporation of the variation described in this traveler.

#### **5. REFERENCES**

None.



**Recommended Variation Discussion for TSTF-505, Revision 2, Model Application**



Paragraph e of the Risk Informed Completion Time Program in TSTF-505, Revision 2, is replaced with a new paragraph e and f, and the addition of a new report, "PRA Upgrade Report," in Section 5.6 of the Technical Specifications (TS).

- e. A RICT must be calculated using the following PRA and non-PRA approaches approved by the NRC, including [list specific PRA and non-PRA approaches used for fire and seismic analysis (e.g., Fire PRA and Seismic Margins Analysis)]. Changes to these PRA and non-PRA approaches require prior NRC approval. The PRA maintenance and upgrade process will validate that other changes to the PRA models used in the RICT program, including changes involving newly developed methods, follow [ [ASME/ANS RA-Sa-2009, "Standard for Level 1/Large Early Release Frequency Probabilistic Risk Assessment for Nuclear Power Plant Applications," Regulatory Guide 1.200, Revision 2, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities," and NEI 17-07, Revision 2, "Performance of PRA Peer Reviews Using the ASME/ANS PRA Standard"] OR [Regulatory Guide 1.200, Revision 3, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities." ] ]
- f. A report shall be submitted in accordance with Specification 5.6.[8] following each PRA upgrade and associated peer review involving a newly developed PRA method that has not been previously reported to the NRC for a RICT program.

#### 5.6.[8] Probabilistic Risk Assessment (PRA) Upgrade Report

A report shall be submitted following each PRA upgrade involving a newly developed PRA 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.[21]. The report shall describe the scope of the upgrade and shall include:

- a. The PRA models upgraded and newly developed method used;
- b. A list of the peer review and finding closure reports available to the NRC for oversight and inspection activities;
- c. Any open findings from the peer review of implementation of the newly developed method; and
- d. Changes to key assumptions related to the newly developed method or its implementation. ]

These revised requirements were developed by the industry and the NRC to provide a regulatory framework that permits licensees to perform PRA upgrades and to use newly developed methods that affect the RICT Program with appropriate controls and oversight by the NRC.

The industry and NRC agree that NRC prior approval is needed for a change to the fire and seismic approaches reviewed by the NRC as part of their approval of the licensee's adoption of TSTF-505. Other PRA model changes may be made using the referenced controls.



Paragraph f and the PRA Upgrade Report require submittal of a report to the NRC following a PRA upgrade and associated peer review that includes newly developed PRA methods. This notifies the NRC of the use of newly developed methods in the RICT Program and provides an opportunity for the NRC to inspect the change.



## **Technical Specifications and Bases Markup**



## 5.5 Programs and Manuals

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### 5.5.20 [ Surveillance Frequency Control Program

This program provides controls for Surveillance Frequencies. The program shall ensure that Surveillance Requirements specified in the Technical Specifications are performed at intervals sufficient to assure the associated Limiting Conditions for Operation are met.

- a. The Surveillance Frequency Control Program shall contain a list of Frequencies of those Surveillance Requirements for which the Frequency is controlled by the program.
- b. Changes to the Frequencies listed in the Surveillance Frequency Control Program shall be made in accordance with NEI 04-10, "Risk-Informed Method for Control of Surveillance Frequencies," Revision 1.
- c. The provisions of Surveillance Requirements 3.0.2 and 3.0.3 are applicable to the Frequencies established in the Surveillance Frequency Control Program. ]

### [ 5.5.21 Risk Informed Completion Time Program

This program provides controls to calculate a Risk Informed Completion Time (RICT) and must be implemented in accordance with NEI 06-09-A, Revision 0, "Risk-Managed Technical Specifications (RMTS) Guidelines." The program shall include the following:

- a. The RICT may not exceed 30 days;

----- REVIEWER'S NOTE -----

The Risk Informed Completion Time is only applicable in MODES supported by the Licensees PRA. Licensee's applying the RICT Program to MODES other than Modes 1 and 2 must demonstrate that they have the capability to calculate a RICT in those MODES or that the risk indicated by their MODE 1 and 2 PRA model is bounding with respect to the lower MODE conditions.

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- b. A RICT may only be utilized in MODE 1, 2 [, and 3, and MODE 4 while relying on steam generators for heat removal];
- c. When a RICT is being used, any change to the plant configuration, as defined in NEI 06-09-A, Appendix A, must be considered for the effect on the RICT.
  1. For planned changes, the revised RICT must be determined prior to implementation of the change in configuration.



## 5.5 Programs and Manuals

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### 5.5.21 Risk Informed Completion Time Program (continued)

2. For emergent conditions, the revised RICT must be determined within the time limits of the Required Action Completion Time (i.e., not the RICT) or 12 hours after the plant configuration change, whichever is less.
  3. Revising the RICT is not required If the plant configuration change would lower plant risk and would result in a longer RICT.
- d. For emergent conditions, if the extent of condition evaluation for inoperable structures, systems, or components (SSCs) is not complete prior to exceeding the Completion Time, the RICT shall account for the increased possibility of common cause failure (CCF) by either:
1. Numerically accounting for the increased possibility of CCF in the RICT calculation; or
  2. Risk Management Actions (RMAs) not already credited in the RICT calculation shall be implemented that support redundant or diverse SSCs that perform the function(s) of the inoperable SSCs, and, if practicable, reduce the frequency of initiating events that challenge the function(s) performed by the inoperable SSCs.
- e. ~~The risk assessment approaches and methods shall be acceptable to the NRC. The plant PRA shall be based on the as-built, as-operated, and maintained plant; and reflect the operating experience at the plant, as specified in Regulatory Guide 1.200, Revision 2. Methods to assess the risk from extending the Completion Times must be PRA methods used to support this license amendment, or other methods approved by the NRC for generic use; and any change in the PRA methods to assess risk that are outside these approval boundaries require prior NRC approval. ]~~ A RICT must be calculated using the following PRA and non-PRA approaches approved by the NRC, including [list specific PRA and non-PRA approaches used for fire and seismic analysis (e.g., Fire PRA and Seismic Margins Analysis)]. Changes to these PRA and non-PRA approaches require prior NRC approval. The PRA maintenance and upgrade process will validate that other changes to the PRA models used in the RICT program, including changes involving newly developed methods, follow [ [ASME/ANS RA-Sa-2009, "Standard for Level 1/ Large Early Release Frequency Probabilistic Risk Assessment for Nuclear Power Plant Applications," Regulatory Guide 1.200, Revision 2, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities," and NEI 17-07, Revision 2, "Performance of PRA Peer Reviews Using the ASME/ANS PRA Standard"] OR [Regulatory Guide 1.200, Revision 3, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities."]]



## 5.5 Programs and Manuals

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### 5.5.21 Risk Informed Completion Time Program (continued)

- f. A report shall be submitted in accordance with Specification 5.6.8 following each PRA upgrade and associated peer review involving a newly developed PRA method that has not been previously reported to the NRC for a RICT program. ]
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## 5.6 Reporting Requirements

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### 5.6.7 Steam Generator Tube Inspection Report (continued)

- e. Number of tubes plugged [or repaired] during the inspection outage for each active degradation mechanism,
- f. Total number and percentage of tubes plugged [or repaired] to date,
- g. The results of condition monitoring, including the results of tube pulls and in-situ testing,
- [h. The effective plugging percentage for all plugging [and tube repairs] in each SG, and]
- [i. Repair method utilized and the number of tubes repaired by each repair method.]

### [ 5.6.8 Probabilistic Risk Assessment (PRA) Upgrade Report

A report shall be submitted following each PRA upgrade involving a newly developed PRA method that has not been previously reported to the NRC for a RICT program and the associated peer review in accordance with Specification 5.5.21. The report shall describe the scope of the upgrade and shall include:

- a. The PRA models upgraded and newly developed method used;
  - b. A list of the peer review and finding closure reports available to the NRC for oversight and inspection activities;
  - c. Any open findings from the peer review of implementation of the newly developed method; and
  - d. Changes to key assumptions related to the newly developed method or its implementation. ]
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## 5.5 Programs and Manuals

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### 5.5.21 Risk Informed Completion Time Program (continued)

----- REVIEWER'S NOTE -----

The Risk Informed Completion Time is only applicable in MODES supported by the Licensees PRA. Licensee's applying the RICT Program to MODES other than Modes 1 and 2 must demonstrate that they have the capability to calculate a RICT in those MODES or that the risk indicated by their MODE 1 and 2 PRA model is bounding with respect to the lower MODE conditions.

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- b. A RICT may only be utilized in MODE 1, 2 [, and 3, and MODE 4 while relying on steam generators for heat removal];
- c. When a RICT is being used, any change to the plant configuration, as defined in NEI 06-09-A, Appendix A, must be considered for the effect on the RICT.
  - 1. For planned changes, the revised RICT must be determined prior to implementation of the change in configuration.
  - 2. For emergent conditions, the revised RICT must be determined within the time limits of the Required Action Completion Time (i.e., not the RICT) or 12 hours after the plant configuration change, whichever is less.
  - 3. Revising the RICT is not required If the plant configuration change would lower plant risk and would result in a longer RICT.
- d. For emergent conditions, if the extent of condition evaluation for inoperable structures, systems, or components (SSCs) is not complete prior to exceeding the Completion Time, the RICT shall account for the increased possibility of common cause failure (CCF) by either:
  - 1. Numerically accounting for the increased possibility of CCF in the RICT calculation; or
  - 2. Risk Management Actions (RMAs) not already credited in the RICT calculation shall be implemented that support redundant or diverse SSCs that perform the function(s) of the inoperable SSCs, and, if practicable, reduce the frequency of initiating events that challenge the function(s) performed by the inoperable SSCs.



## 5.5 Programs and Manuals

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### 5.5.21 Risk Informed Completion Time Program (continued)

- e. ~~The risk assessment approaches and methods shall be acceptable to the NRC. The plant PRA shall be based on the as-built, as-operated, and maintained plant; and reflect the operating experience at the plant, as specified in Regulatory Guide 1.200, Revision 2. Methods to assess the risk from extending the Completion Times must be PRA methods used to support this license amendment, or other methods approved by the NRC for generic use; and any change in the PRA methods to assess risk that are outside these approval boundaries require prior NRC approval. ]~~  
A RICT must be calculated using the following PRA and non-PRA approaches approved by the NRC, including [list specific PRA and non-PRA approaches used for fire and seismic analysis (e.g., Fire PRA and Seismic Margins Analysis)]. Changes to these PRA and non-PRA approaches require prior NRC approval. The PRA maintenance and upgrade process will validate that other changes to the PRA models used in the RICT program, including changes involving newly developed methods, follow [ ASME/ANS RA-Sa-2009, "Standard for Level 1/ Large Early Release Frequency Probabilistic Risk Assessment for Nuclear Power Plant Applications," Regulatory Guide 1.200, Revision 2, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities," and NEI 17-07, Revision 2, "Performance of PRA Peer Reviews Using the ASME/ANS PRA Standard"] OR [Regulatory Guide 1.200, Revision 3, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities." ] ]
  - f. A report shall be submitted in accordance with Specification 5.6.8 following each PRA upgrade and associated peer review involving a newly developed PRA method that has not been previously reported to the NRC for a RICT program. ]
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## 5.6 Reporting Requirements

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### 5.6.7 Steam Generator Tube Inspection Report (continued)

- d. Location, orientation (if linear), and measured sizes (if available) of service induced indications,
- e. Number of tubes plugged [or repaired] during the inspection outage for each active degradation mechanism,
- f. Total number and percentage of tubes plugged [or repaired] to date,
- g. The results of condition monitoring, including the results of tube pulls and in-situ testing,
- h. The effective plugging percentage for all plugging [and tube repairs] in each SG, and]
- i. Repair method utilized and the number of tubes repaired by each repair method.]

### [ 5.6.8 Probabilistic Risk Assessment (PRA) Upgrade Report

A report shall be submitted following each PRA upgrade involving a newly developed PRA method that has not been previously reported to the NRC for a RICT program and the associated peer review in accordance with Specification 5.5.21. The report shall describe the scope of the upgrade and shall include:

- a. The PRA models upgraded and newly developed method used;
  - b. A list of the peer review and finding closure reports available to the NRC for oversight and inspection activities;
  - c. Any open findings from the peer review of implementation of the newly developed method; and
  - d. Changes to key assumptions related to the newly developed method or its implementation. ]
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## 5.5 Programs and Manuals

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### 5.5.19 Setpoint Control Program (continued)

- e. The program shall be specified in [insert the facility FSAR reference or the name of any document incorporated into the facility FSAR by reference]. ]

### 5.5.20 [ Surveillance Frequency Control Program

This program provides controls for Surveillance Frequencies. The program shall ensure that Surveillance Requirements specified in the Technical Specifications are performed at intervals sufficient to assure the associated Limiting Conditions for Operation are met.

- a. The Surveillance Frequency Control Program shall contain a list of Frequencies of those Surveillance Requirements for which the Frequency is controlled by the program.
- b. Changes to the Frequencies listed in the Surveillance Frequency Control Program shall be made in accordance with NEI 04-10, "Risk-Informed Method for Control of Surveillance Frequencies," Revision 1.
- c. The provisions of Surveillance Requirements 3.0.2 and 3.0.3 are applicable to the Frequencies established in the Surveillance Frequency Control Program. ]

### [ 5.5.21 Risk Informed Completion Time Program

This program provides controls to calculate a Risk Informed Completion Time (RICT) and must be implemented in accordance with NEI 06-09-A, Revision 0, "Risk-Managed Technical Specifications (RMTS) Guidelines." The program shall include the following:

- a. The RICT may not exceed 30 days;

----- REVIEWER'S NOTE -----

The Risk Informed Completion Time is only applicable in MODES supported by the Licensees PRA. Licensee's applying the RICT Program to MODES other than Modes 1 and 2 must demonstrate that they have the capability to calculate a RICT in those MODES or that the risk indicated by their MODE 1 and 2 PRA model is bounding with respect to the lower MODE conditions.

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- b. A RICT may only be utilized in MODE 1, 2 [, and 3, and MODE 4 while relying on steam generators for heat removal];
- c. When a RICT is being used, any change to the plant configuration, as defined in NEI 06-09-A, Appendix A, must be considered for the effect on the RICT.



## 5.5 Programs and Manuals

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### 5.5.21 Risk Informed Completion Time Program (continued)

1. For planned changes, the revised RICT must be determined prior to implementation of the change in configuration.
  2. For emergent conditions, the revised RICT must be determined within the time limits of the Required Action Completion Time (i.e., not the RICT) or 12 hours after the plant configuration change, whichever is less.
  3. Revising the RICT is not required If the plant configuration change would lower plant risk and would result in a longer RICT.
- d. For emergent conditions, if the extent of condition evaluation for inoperable structures, systems, or components (SSCs) is not complete prior to exceeding the Completion Time, the RICT shall account for the increased possibility of common cause failure (CCF) by either:
1. Numerically accounting for the increased possibility of CCF in the RICT calculation; or
  2. Risk Management Actions (RMAs) not already credited in the RICT calculation shall be implemented that support redundant or diverse SSCs that perform the function(s) of the inoperable SSCs, and, if practicable, reduce the frequency of initiating events that challenge the function(s) performed by the inoperable SSCs.



## 5.5 Programs and Manuals

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### 5.5.21 Risk Informed Completion Time Program (continued)

- e. ~~The risk assessment approaches and methods shall be acceptable to the NRC. The plant PRA shall be based on the as-built, as-operated, and maintained plant; and reflect the operating experience at the plant, as specified in Regulatory Guide 1.200, Revision 2. Methods to assess the risk from extending the Completion Times must be PRA methods used to support this license amendment, or other methods approved by the NRC for generic use; and any change in the PRA methods to assess risk that are outside these approval boundaries require prior NRC approval. ]~~ A RICT must be calculated using the following PRA and non-PRA approaches approved by the NRC, including [list specific PRA and non-PRA approaches used for fire and seismic analysis (e.g., Fire PRA and Seismic Margins Analysis)]. Changes to these PRA and non-PRA approaches require prior NRC approval. The PRA maintenance and upgrade process will validate that other changes to the PRA models used in the RICT program, including changes involving newly developed methods, follow [ ASME/ANS RA-Sa-2009, "Standard for Level 1/ Large Early Release Frequency Probabilistic Risk Assessment for Nuclear Power Plant Applications," Regulatory Guide 1.200, Revision 2, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities," and NEI 17-07, Revision 2, "Performance of PRA Peer Reviews Using the ASME/ANS PRA Standard"] OR [Regulatory Guide 1.200, Revision 3, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities." ]
  - f. ~~A report shall be submitted in accordance with Specification 5.6.8 following each PRA upgrade and associated peer review involving a newly developed PRA method that has not been previously reported to the NRC for a RICT program. ]~~
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## 5.6 Reporting Requirements

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### 5.6.7 Steam Generator Tube Inspection Report (continued)

- e. Number of tubes plugged [or repaired] during the inspection outage for each active degradation mechanism,
- f. Total number and percentage of tubes plugged [or repaired] to date,
- g. The results of condition monitoring, including the results of tube pulls and in-situ testing,
- [h. The effective plugging percentage for all plugging [and tube repairs] in each SG, and]
- [i. Repair method utilized and the number of tubes repaired by each repair method.]

### [ 5.6.8 Probabilistic Risk Assessment (PRA) Upgrade Report

A report shall be submitted following each PRA upgrade involving a newly developed PRA method that has not been previously reported to the NRC for a RICT program and the associated peer review in accordance with Specification 5.5.21. The report shall describe the scope of the upgrade and shall include:

- a. The PRA models upgraded and newly developed method used;
  - b. A list of the peer review and finding closure reports available to the NRC for oversight and inspection activities;
  - c. Any open findings from the peer review of implementation of the newly developed method; and
  - d. Changes to key assumptions related to the newly developed method or its implementation. ]
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## 5.5 Programs and Manuals

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### 5.5.17 Surveillance Frequency Control Program (continued)

- a. The Surveillance Frequency Control Program shall contain a list of Frequencies of those Surveillance Requirements for which the Frequency is controlled by the program.
- b. Changes to the Frequencies listed in the Surveillance Frequency Control Program shall be made in accordance with NEI 04-10, "Risk-Informed Method for Control of Surveillance Frequencies," Revision 1.
- c. The provisions of Surveillance Requirements 3.0.2 and 3.0.3 are applicable to the Frequencies established in the Surveillance Frequency Control Program. ]

### [ 5.5.18 Risk Informed Completion Time Program

This program provides controls to calculate a Risk Informed Completion Time (RICT) and must be implemented in accordance with NEI 06-09-A, Revision 0, "Risk-Managed Technical Specifications (RMTS) Guidelines." The program shall include the following:

- a. The RICT may not exceed 30 days;

----- REVIEWER'S NOTE -----

The Risk Informed Completion Time is only applicable in MODES supported by the Licensees PRA. Licensee's applying the RICT Program to MODES other than Modes 1 and 2 must demonstrate that they have the capability to calculate a RICT in those MODES or that the risk indicated by their MODE 1 and 2 PRA model is bounding with respect to the lower MODE conditions.

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- b. A RICT may only be utilized in MODE 1, 2 [, and 3, and MODE 4 while relying on steam generators for heat removal];
- c. When a RICT is being used, any change to the plant configuration, as defined in NEI 06-09-A, Appendix A, must be considered for the effect on the RICT.
  - 1. For planned changes, the revised RICT must be determined prior to implementation of the change in configuration.
  - 2. For emergent conditions, the revised RICT must be determined within the time limits of the Required Action Completion Time (i.e., not the RICT) or 12 hours after the plant configuration change, whichever is less.



## 5.5 Programs and Manuals

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### 5.5.18 Risk Informed Completion Time Program (continued)

3. Revising the RICT is not required If the plant configuration change would lower plant risk and would result in a longer RICT.
- d. For emergent conditions, if the extent of condition evaluation for inoperable structures, systems, or components (SSCs) is not complete prior to exceeding the Completion Time, the RICT shall account for the increased possibility of common cause failure (CCF) by either:
  1. Numerically accounting for the increased possibility of CCF in the RICT calculation; or
  2. Risk Management Actions (RMAs) not already credited in the RICT calculation shall be implemented that support redundant or diverse SSCs that perform the function(s) of the inoperable SSCs, and, if practicable, reduce the frequency of initiating events that challenge the function(s) performed by the inoperable SSCs.
- e. ~~The risk assessment approaches and methods shall be acceptable to the NRC. The plant PRA shall be based on the as-built, as-operated, and maintained plant; and reflect the operating experience at the plant, as specified in Regulatory Guide 1.200, Revision 2. Methods to assess the risk from extending the Completion Times must be PRA methods used to support this license amendment, or other methods approved by the NRC for generic use; and any change in the PRA methods to assess risk that are outside these approval boundaries require prior NRC approval. ]~~  
RICT must be calculated using the following PRA and non-PRA approaches approved by the NRC, including [list specific PRA and non-PRA approaches used for fire and seismic analysis (e.g., Fire PRA and Seismic Margins Analysis)]. Changes to these PRA and non-PRA approaches require prior NRC approval. The PRA maintenance and upgrade process will validate that other changes to the PRA models used in the RICT program, including changes involving newly developed methods, follow [ [ASME/ANS RA-Sa-2009, "Standard for Level 1/Large Early Release Frequency Probabilistic Risk Assessment for Nuclear Power Plant Applications," Regulatory Guide 1.200, Revision 2, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities," and NEI 17-07, Revision 2, "Performance of PRA Peer Reviews Using the ASME/ANS PRA Standard"] OR [Regulatory Guide 1.200, Revision 3, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities."]] ]
- f. A report shall be submitted in accordance with Specification 5.6.6 following each PRA upgrade and associated peer review involving a newly developed PRA method that has not been previously reported to the NRC for a RICT program. ]



## 5.6 Reporting Requirements

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### 5.6.4 RCS PRESSURE AND TEMPERATURE LIMITS REPORT (continued)

6. The minimum temperature requirements of Appendix G to 10 CFR Part 50 shall be incorporated into the pressure and temperature limit curves.
  7. Licensees who have removed two or more capsules should compare for each surveillance material the measured increase in reference temperature ( $RT_{NDT}$ ) to the predicted increase in  $RT_{NDT}$ ; where the predicted increase in  $RT_{NDT}$  is based on the mean shift in  $RT_{NDT}$  plus the two standard deviation value ( $2\sigma_{\Delta}$ ) specified in Regulatory Guide 1.99, Revision 2. If the measured value exceeds the predicted value (increase  $RT_{NDT} + 2\sigma_{\Delta}$ ), the licensee should provide a supplement to the PTLR to demonstrate how the results affect the approved methodology.
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### 5.6.5 Post Accident Monitoring Report

When a report is required by Condition B or F of LCO 3.3.[3.1], "Post Accident Monitoring (PAM) Instrumentation," a report shall be submitted within the following 14 days. The report shall outline the preplanned alternate method of monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrumentation channels of the Function to OPERABLE status.

-----REVIEWER'S NOTE-----  
These reports may be required covering inspection, test, and maintenance activities. These reports are determined on an individual basis for each unit and their preparation and submittal are designated in the Technical Specifications.  
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### [ 5.6.6 Probabilistic Risk Assessment (PRA) Upgrade Report

A report shall be submitted following each PRA upgrade involving a newly developed PRA 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 and shall include:

- a. The PRA models upgraded and newly developed method used;
  - b. A list of the peer review and finding closure reports available to the NRC for oversight and inspection activities;
  - c. Any open findings from the peer review of implementation of the newly developed method; and
  - d. Changes to key assumptions related to the newly developed method or its implementation. ]
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## 5.5 Programs and Manuals

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### 5.5.17 Surveillance Frequency Control Program (continued)

- b. Changes to the Frequencies listed in the Surveillance Frequency Control Program shall be made in accordance with NEI 04-10, "Risk-Informed Method for Control of Surveillance Frequencies," Revision 1.
- c. The provisions of Surveillance Requirements 3.0.2 and 3.0.3 are applicable to the Frequencies established in the Surveillance Frequency Control Program. ]

### [ 5.5.18 Risk Informed Completion Time Program

This program provides controls to calculate a Risk Informed Completion Time (RICT) and must be implemented in accordance with NEI 06-09-A, Revision 0, "Risk-Managed Technical Specifications (RMTS) Guidelines." The program shall include the following:

- a. The RICT may not exceed 30 days;

----- REVIEWER'S NOTE -----

The Risk Informed Completion Time is only applicable in MODES supported by the Licensees PRA. Licensee's applying the RICT Program to MODES other than Modes 1 and 2 must demonstrate that they have the capability to calculate a RICT in those MODES or that the risk indicated by their MODE 1 and 2 PRA model is bounding with respect to the lower MODE conditions.

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- b. A RICT may only be utilized in MODE 1, 2 [, and 3, and MODE 4 while relying on steam generators for heat removal];
- c. When a RICT is being used, any change to the plant configuration, as defined in NEI 06-09-A, Appendix A, must be considered for the effect on the RICT.
  - 1. For planned changes, the revised RICT must be determined prior to implementation of the change in configuration.
  - 2. For emergent conditions, the revised RICT must be determined within the time limits of the Required Action Completion Time (i.e., not the RICT) or 12 hours after the plant configuration change, whichever is less.
  - 3. Revising the RICT is not required If the plant configuration change would lower plant risk and would result in a longer RICT.



## 5.5 Programs and Manuals

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### 5.5.18 Risk Informed Completion Time Program (continued)

- d. For emergent conditions, if the extent of condition evaluation for inoperable structures, systems, or components (SSCs) is not complete prior to exceeding the Completion Time, the RICT shall account for the increased possibility of common cause failure (CCF) by either:
  - 1. Numerically accounting for the increased possibility of CCF in the RICT calculation; or
  - 2. Risk Management Actions (RMAs) not already credited in the RICT calculation shall be implemented that support redundant or diverse SSCs that perform the function(s) of the inoperable SSCs, and, if practicable, reduce the frequency of initiating events that challenge the function(s) performed by the inoperable SSCs.
- e. ~~The risk assessment approaches and methods shall be acceptable to the NRC. The plant PRA shall be based on the as-built, as-operated, and maintained plant; and reflect the operating experience at the plant, as specified in Regulatory Guide 1.200, Revision 2. Methods to assess the risk from extending the Completion Times must be PRA methods used to support this license amendment, or other methods approved by the NRC for generic use; and any change in the PRA methods to assess risk that are outside these approval boundaries require prior NRC approval. ]~~  
A RICT must be calculated using the following PRA and non-PRA approaches approved by the NRC, including [list specific PRA and non-PRA approaches used for fire and seismic analysis (e.g., Fire PRA and Seismic Margins Analysis)]. Changes to these PRA and non-PRA approaches require prior NRC approval. The PRA maintenance and upgrade process will validate that other changes to the PRA models used in the RICT program, including changes involving newly developed methods, follow [ [ASME/ANS RA-Sa-2009, "Standard for Level 1/Large Early Release Frequency Probabilistic Risk Assessment for Nuclear Power Plant Applications," Regulatory Guide 1.200, Revision 2, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities," and NEI 17-07, Revision 2, "Performance of PRA Peer Reviews Using the ASME/ANS PRA Standard"] OR [Regulatory Guide 1.200, Revision 3, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities."]]
- f. A report shall be submitted in accordance with Specification 5.6.7 following each PRA upgrade and associated peer review involving a newly developed PRA method that has not been previously reported to the NRC for a RICT program. ]



## 5.6 Reporting Requirements

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### [ 5.6.7 Probabilistic Risk Assessment (PRA) Upgrade Report

A report shall be submitted following each PRA upgrade involving a newly developed PRA 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 and shall include:

- a. The PRA models upgraded and newly developed method used;
  - b. A list of the peer review and finding closure reports available to the NRC for oversight and inspection activities;
  - c. Any open findings from the peer review of implementation of the newly developed method; and
  - d. Changes to key assumptions related to the newly developed method or its implementation. ]
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## Comparison of TSTF-579 and NRC 3/10/20 Versions of Changes to the RICT Program

TSTF-579	NRC 3/10/20 Version	Comparison/Comments
A RICT must be calculated using the following PRA and non-PRA approaches approved by the NRC, including [list specific PRA and non-PRA approaches used for fire and seismic analysis (e.g., Fire PRA and Seismic Margins Analysis)]. Changes to these PRA and non-PRA approaches require prior NRC approval.	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.	The 3/10/20 version eliminated the phrase "PRA and non-PRA" approaches.
The PRA maintenance and upgrade process will validate that other changes to the PRA models used in the RICT program, including changes involving newly developed methods, follow [ [ASME/ANS RA-Sa-2009, "Standard for Level 1/Large Early Release Frequency Probabilistic Risk Assessment for Nuclear Power Plant Applications," Regulatory Guide 1.200, Revision 2, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities," and NEI 17-07, Revision 2, "Performance of PRA Peer Reviews Using the ASME/ANS PRA Standard"] OR [Regulatory Guide 1.200, Revision 3, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities."]]	When making changes to the models used in PRA <sup>1</sup> , 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."	<p>The 3/10/20 version conflicts with the first paragraph (needs "other changes to the PRA models".)</p> <p>The 3/10/20 version does not state "used in the RICT Program"</p> <p>The TS never refer to "the licensee."</p> <p>Footnotes are not permitted in the Administrative Controls section of the TS.</p> <p>The 3/10/20 version is otherwise similar to the second option (reference to RG 1.200, Rev. 2) is chosen.</p>
	A licensee shall obtain a license amendment pursuant to 10 CFR 50.90 prior to implementing a RICT that uses a Newly Developed Method <sup>2</sup> if it does not meet all	<p>The TS never refer to "a licensee."</p> <p>Footnotes are not permitted in the</p>

<sup>1</sup> The definition of PRA Model is provided in RG 1.200 Rev. 3

<sup>2</sup> The definition of "newly-developed method" is provided in RG 1.200 Rev. 3



## Comparison of TSTF-579 and NRC 3/10/20 Versions of Changes to the RICT Program

	applicable review requirements provided in tables 1.7.2-2 through 1.7.2-7 in Rev. XX of PWROG-19027 <sup>3</sup> using the process described in Rev. 2 of NEI-17-07 <sup>4</sup> .	<p>Administrative Controls section of the TS.</p> <p>ADAMS accession numbers are never used in the TS.</p> <p>An alternate approach to the new paragraph I the 3/10/20 version would be for this information to be in RG 1.200, Rev. 3. Then it would be required by the previous paragraph.</p> <p>Is PWROG-19027 available to all licensees?</p>
A report shall be submitted in accordance with Specification 5.6.8 following each PRA upgrade and associated peer review involving a newly developed PRA method that has not been previously reported to the NRC for a RICT program. ]	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.	<p>The report is in Section 5.6, "Reporting Requirements," not Section 5.5.</p> <p>In the 3/10/20 version, the term "associated peer review" is moved from after "PRA upgrade" to the end of the sentence. Recommend it be moved back.</p> <p>The 3/10/20 version adds the parenthetical "prior to using that method in a RICT." The meaning is unclear (does it modify "submitted" or "not been previously reported")</p>
A report shall be submitted following each PRA upgrade involving a newly developed PRA method that has not been previously reported to the NRC for a RICT program and the associated peer review in	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	Is the intent of the 3/10/20 version for "Newly Developed Method" to be used as a defined term?

<sup>3</sup> Provide ML# of Refer to staff endorsed version of PWROG-19027

<sup>4</sup> Provide ML# of NRC endorsed NEI-17-07 version.



## Comparison of TSTF-579 and NRC 3/10/20 Versions of Changes to the RICT Program

<p>accordance with Specification 5.5.21. The report shall describe the scope of the upgrade and shall include:</p> <p>a. The PRA models upgraded and newly developed method used;</p> <p>b. A list of the peer review and finding closure reports available to the NRC for oversight and inspection activities;</p> <p>c. Any open findings from the peer review of implementation of the newly developed method; and</p> <p>d. Changes to key assumptions related to the newly developed method or its implementation. ]</p>	<p>accordance with Specification [5.5.18]. The report shall describe the scope of the upgrade, including:</p> <p>(1) the models in PRAs are upgraded and newly developed methods used;</p> <p>(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,</p> <p>(3) the peer review and finding closure reports available to the NRC for oversight and inspection activities;</p> <p>(4) any open findings from the peer-review of implementation of the newly developed method and its disposition; and,</p> <p>(5) changes to key assumptions related to the newly developed method or its implementation.</p>	<p>Item (1) is missing words ("that were"?)</p> <p>Item (2) is new and the meaning is unclear. Is a justification of the new method required to be submitted? If so, what is the standard for acceptability?</p> <p>Item (3) is similar to TSTF-579 item b.</p> <p>Item 4 is similar to TSTF-579 item c, except that "and its disposition" is added.</p> <p>Item (5) is similar to TSTF-579 item d.</p>
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