

From: Brian Mann <brian.mann@excelservices.com>
Sent: Wednesday, March 11, 2020 12:00 PM
To: Miller, Ed
Cc: Victoria Anderson (vka@nei.org); Linthicum, Roy R.:(Exelon Nuclear); Cusumano, Victor
Subject: [External_Sender] TS revision reflecting the 3/11/2020 public teleconference
Attachments: Changes to the TSTF-579.docx

Ed,

I believe the attached file reflects the discussions we held this morning.

I'm sending it as a Word file instead of a PDF. It's easiest to read with "Review" set to "Simple markup" and "Show comments."

MS Word won't print a document with "simple markup" and showing comments. It's either all markup (which is confusing) and comments, or a simple markup and no comments.

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Subject: [External_Sender] TS revision reflecting the 3/11/2020 public teleconference
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From: Brian Mann

Created By: brian.mann@excelservices.com

Recipients:

"Victoria Anderson (vka@nei.org)" <vka@nei.org>
Tracking Status: None
"Linthicum, Roy R.:(Exelon Nuclear)" <roy.linthicum@exeloncorp.com>
Tracking Status: None
"Cusumano, Victor" <Victor.Cusumano@nrc.gov>
Tracking Status: None
"Miller, Ed" <Ed.Miller@nrc.gov>
Tracking Status: None

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Files	Size	Date & Time
MESSAGE	763	3/11/2020 12:00:05 PM
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Changes to the TSTF-579.docx	27901	

Options

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Sensitivity: Normal
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Changes to the TSTF-579-T wording based on NRC 3/10/20 proposal and the 3/11/20 public teleconference

5.5.X, Risk Informed Completion Time Program

- ...
- 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. Changes to the probabilistic risk assessment (PRA) methods used to calculate a RICT shall be made in accordance with the configuration control process in Regulatory Guide 1.200, Revision 3, "Acceptability of Probabilistic Risk Assessment Results for Risk-Informed Activities," Use of any newly developed methods, as defined in Regulatory Guide 1.200, Revision 3, requires satisfying all applicable review requirements in Tables 1.7.2-2 through 1.7.2-7 of PWROG-19027, "Newly Developed Method Requirements and Peer Review," Revision 0, as described in NEI 17-07, "Performance of PRA Peer Reviews Using the ASME/ANS PRA Standard," Revision 2. 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 ~~that includes involving~~ a newly developed PRA method ~~and prior to using that method to calculate a RICT. A report is not required to be submitted if the newly developed method that has not been previously reported to the NRC for a RICT program.]~~

Commented [BM1]: This sentence isn't needed. The TS requires following the listed approaches and if other approaches are desired, the TS must be changed.

Commented [BM2]: "methods" or "models"?

Commented [BM3]: Is the phrase the "configuration control process" an unambiguous reference in RG 1.200, Rev. 3? If not, consider referencing a section number or specific Regulatory Position (See the Battery Monitoring and Maintenance Program, paragraph a.4)

Commented [BM4]: Revised to state as a requirement. As in all cases, if a licensee doesn't want to follow a TS requirement, a license amendment is needed. If this statement is called out with RG 1200, Rev. 3, (Preferably in a Regulatory Position), the sentence isn't needed.

Commented [BM5]: Broke up into two sentences for clarity.

5.6.X, Probabilistic Risk Assessment (PRA) Upgrade Report

A report shall be submitted following each PRA upgrade ~~and associated peer review including involving~~ a newly developed PRA method ~~and prior to using that method to calculate a RICT in accordance with Specification 5.5.XX. A report is not required to be submitted if the 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.XX.~~ The report shall describe the scope of the upgrade and shall include:

Commented [BM6]: Revised the wording to be identical to the "calling" requirement in 5.5.X. Any differences could cause confusion.

- a. The PRA models upgraded and ~~the~~ newly developed method used;
- b. ~~A description of the acceptability of the newly developed method consistent with the method developer requirements in NEI 17-07, "Performance of PRA Peer Reviews Using the ASME/ANS PRA Standard," Revision 2.~~
- ~~bc.~~ ~~A list of t~~he peer review and finding closure reports available to the NRC for oversight and inspection activities;

Commented [BM7]: As I understand it after talking with Roy Linthicum, if a new method has been previously reported by a licensee or a vendor in accordance with NEI 17-07, no report is required. Therefore, the "if" statement in the 3/10/20 proposal isn't needed. This reporting provision would always be true if a PRA Upgrade Report is submitted.

Changes to the TSTF-579-T wording based on NRC 3/10/20 proposal and the 3/11/20 public teleconference

- ~~ed.~~ Any open findings from the peer review of implementation of the newly developed method and their disposition; and
- ~~de.~~ Any cChanges to key assumptions related to the newly developed method or its implementation.