



PDR per R. Emmit

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

James Pittman
NLS/69
Reference 1224

August 4, 1989

MEMORANDUM FOR: Bill M. Morris, Director
Division of Regulatory Applications
Office of Nuclear Regulatory Research

FROM: Frank P. Gillespie, Director
Program Management, Policy Development
and Analysis Staff
Office of Nuclear Reactor Regulation

SUBJECT: PRIORITIZATION OF GI 117, "ALLOWABLE OUTAGE TIMES
FOR DIVERSE SIMULTANEOUS EQUIPMENT OUTAGES"

We have reviewed the RES prioritization analysis of the subject generic issue, and we do not object to the tentative assignment of medium priority to the issue. Since both the risk reduction and the cost associated with resolution of this issue may be higher than estimated in the prioritization analysis, the issue may merit re-prioritization when the costs and benefits of issue resolution become clearer.

Before RES initiates a program to resolve this issue, however, discussions with NRR should be held to avoid duplication of effort. At the Commission meeting of June 2, 1989, during the discussion of the Technical Specifications Improvement Program (TSIP), it was pointed out that a joint NRC-industry effort to establish a risk-based plant configuration control system is underway. This program, which contains the essence of the proposed GI 117 effort as a subset, received strong Commission support.

We feel that the TSIP will establish the feasibility of an approach more global than that proposed in GI 117 for the determination of risk-based diverse equipment allowable outage times. We have a volunteer plant, San Onofre Nuclear Generation Station Units 2 and 3, on which to test hardware and software aspects of a pilot, computerized, risk-based configuration control system. The planning phase of this effort should be completed in October 1989.

Our pilot study will involve a detailed level-one PRA with configuration-dependent human error rate treatment. With regard to the use of individual plant examination (IPE) PRAs as discussed in the justification of the prioritization of GI 117, we believe that some of the individual plant responses to the IPE letter may not be entirely suitable for use in our program since the degree of modeling detail may not be sufficient.

ADD: R. Emmit, RES

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In addition, we believe, based on data relating to historic plant behavior, that the portion of our program dealing with test and maintenance outages, which is essentially identical to GI 117, may provide safety improvements that would easily justify any attendant costs.

for Cecil D. Thomas

for Frank P. Gillespie, Director
Program Management, Policy Development
and Analysis Staff
Office of Nuclear Reactor Regulation

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