



**License Amendment Request Revise Technical Specifications to  
Adopt Risk Informed Completion Times TSTF-505, Revision 2,  
“Provide Risk-Informed Extended Completion Times –  
RITSTF Initiative 4b”**

April 21, 2021

# Agenda

- Describe future license amendment request (LAR)
  - Scope of the Request
  - Variations from TSTF-505
  - PRA Models and CRMP Summary
- LAR Schedule
- Summary
- Questions/Comments?

## Scope of the Request

- LAR is based on TSTF-505, Revision 2, and NEI 06-09, “Risk-Informed Technical Specifications Initiative 4b, Risk-Managed Technical Specifications (RMTS) Guidelines”
- RICTs apply to 20 SQN LCOs
  - Applicable in Modes 1 and 2
  - No “loss of function” consistent with template
- New TS 5.5 program called the “Risk Informed Completion Time Program”
- LAR informed by approved precedent and those currently under review

# Variations

Several types of administrative variations are taken

- Required Actions (RAs) with different numbering and slightly different wording with same intent
- TSTF-505 RAs that SQN TS does not have
- Instrumentation RAs invoked for different Functions
- RICTs not applied since Additional Justifications weren't met (e.g., not having a Shutdown PRA)
- Miscellaneous site-specific formatting changes

## Variations (continued)

Five technical variations are being taken

- SQN Instrumentation RAs that are not in STS meet the criteria for applying a RICT
- Instrumentation RA revised for consistency with STS
- Site-specific ERCW System RA that is not in STS which meet the criteria for applying a RICT
- Site-specific Offsite Power RA that is not in STS which meet the criteria for applying a RICT
- Site-specific Electrical Distribution RA that is not in STS which meet the criteria for applying a RICT

# **PRA Technical Acceptability**

## **Internal Events including Internal Flooding**

- Peer Reviewed Using NEI 05-04 Process Against ASME/ANS RA-Sa-2009 (Parts 2 and 3) with RG 1.200 Rev 2 Exceptions
- Finding Closure Review Performed Using Appendix X Process
- No Open Internal Events/Internal Flooding Finding Level F&Os

## **Fire**

- Peer Reviewed Using NEI 07-12 Process Against ASME/ANS RA-Sa-2009 (Part 4) with RG 1.200 Rev 2 Exceptions
- Finding Closure Review Performed Using Appendix X Process
- No Open Fire PRA Finding Level F&Os

# **PRA Technical Acceptability (continued)**

## **Seismic**

- Peer Reviewed Using NEI 12-13 Process Against ASME/ANS RA-Sb-2013 (Part 5) with applicable RG 1.200 Rev 2 Exceptions
- Finding Closure Review Performed Using Appendix X Process
- No Open Seismic PRA Finding Level F&Os

## **Other External Hazards**

- All Other External Hazards Screened Out in accordance with ASME/ANS RA-Sa-2009 (Part 6)

## **RICT Program Real-Time Model**

A Real-Time Risk Model similar to existing Maintenance Rule a(4) Configuration Risk Management Program

- Incorporates Internal Events, Internal Flooding, Fire and Seismic into a One-Top Multi-Hazard Model
- Uses EPRI Phoenix Risk Analysis Software
- Incorporates RICT Calculation Based on CDF and LERF for Unit 1 and Unit 2



## Schedule

- Projected submittal in mid-May 2021 with a requested approval within one year
- A 180-day implementation period is proposed

## Summary

- TSTF-505 LAR is scheduled to be submitted in mid-May 2021 with approval requested in one year
- LAR is consistent with TSTF-505 Model Application
- RICT process will follow NEI 06-09-A
- PRA is technically acceptable for the RICT Application

**Questions/  
Comments**

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