Point Beach Unit 1 and Unit 2

Pre-Submittal Meeting

License Amendment Request

Adopt Risk Informed Completion Times TSTF-505, Revision 2, "Provide Risk-Informed Extended Completion Times - RITSTF Initiative 4b"

September 16, 2021

Agenda

- **Describe Proposed License Amendment Request (LAR)**
  - LAR Scope
  - Applicable standards, guidance
  - LAR structure and content
  - TSTF-505 Variations
- **Point Beach PRA**
  - Quality
  - Applications
  - Configuration Risk Management
- **Schedule / Implementation**
- **Questions, Follow-up Items**

Scope

- **Proposes RICT for selected Required Actions**
  - Includes RPS, ESFAS Instrumentation
  - Front-stop equals current CT / 30-day maximum back-stop
  - No RICT for MODE changes or shutdown ACTIONs (e.g., TS 3.0.3)

- **MODES 1 and 2 applicability only**

- **Required Actions modified consistent with TSTF**
  - Removes specified time from discovery of failure to meet LCO
  - Minor changes to RPS, ESFAS instrument tables

Applicable Standards, Guidance

- **TSTF-505, Revision 2**
  - No loss of function
  - PRA functional requires design basis accident (DBA) capability be met
  - Allows bounding approach for non-PRA modeled SSCs
  - Addresses all hazards, including external events (e.g., fires)

- **NEI 06-09 (Rev. 0) - A,** Risk-Informed Technical Specifications Initiative 4b, Risk-Managed Technical Specifications (RMTS) Guidelines

- **Regulatory Guide (RG) 1.200, Revision 2,** An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities

LAR Structure, Content

- **TSTF-505, Revision 2, Model Application**
  - Clean copy TS pages (upon scope finalization)
  - Current TS vs. TSTF cross-reference
  - Includes recommended enclosures, as applicable

- **Creates new TS 5.5.7, RICT Program**
  - Program implements NEI 06-09, Risk-Informed Technical Specifications Initiative 4b, Risk-Managed Technical Specifications Guidelines"

- **PRA Supporting Information**
  - PRA Technical Adequacy
  - Table with proposed items and backstop using current PRA model

TSTF-505 Variations

- **Current TS based on NUREG 1431, Revision 1**
- **RPS and ESFAS Functional Unit (FU) descriptions**
  - e.g., Steam line isolation for steam flow-high coincident with T_{avg} low vs. low-low
- **Service Water (SW) System Requirements**
  - e.g., Non-essential SW load flowpath isolation requirements
- **Electrical Systems Requirements**
  - e.g., Immediate inoperability of supported required features (TS 3.8.9)
  - e.g., One vs. 'one or more' ACTION conditions;
- **Non-TSTF-505 LCOs**
  - May use bounding approach

PRA Quality

- **PRA Technical Adequacy**
  - Internal Events, Internal Flooding, Fire
    - RG 1.200, Revision 2, peer reviewed
    - Initial Appendix X to NEI 05-04 finding closure review complete
    - Open findings resolution in progress.
    - Additional Appendix X review for closure. Planned prior to LAR submittal
  - Seismic
    - Seismic penalty will be applied to all RICTs based on current seismic hazard for CDF & LERF
  - Other External Hazards will be screened with justification

PRA Applications

- **Initiative 5b, Surveillance Frequency Control Program**
  - Amendments issued July 2015 (ADAMS Accession No. ML15195A201)
- **FIRE PRA (NFPA 805)**
  - Amendments issued September 2016 (ADAMS Accession No. ML16196A093)
- **10 CFR 50.69**
  - Amendments issued November 2018 (ADAMS Accession No. ML18289A378)
- **Containment Bldg. Construction Truss Design**
  - Amendments issued March 2019 (ADAMS Accession No. ML18345A110)

Configuration Risk Management

- **CRMP utilizes a Real-Time Risk Model similar to existing Maintenance Rule a(4) Configuration Risk Management Program**
  - Uses EPRI Phoenix Risk Analysis Software
  - Incorporates RICT/RMAT calculation features
  - Incorporates seismic penalty factor

Schedule / Implementation

- **Submit 1st Quarter 2022**
- **Request LAR approval within one year**
- **Request 180-day implementation period**

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Questions, Comments and Follow-up Items