

#### **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 54 WBN LCOs
  - Applicable in Modes 1 and 2
  - No "loss of function" consistent with template
- New TS 5.7 program called the "Risk Informed Completion Time Program"
- LAR informed by approved precedent and those currently under review
- Includes adoption of TSTF-439, Revision 2, "Eliminate Second Completion Times Limiting Time From Discovery of Failure to Meet an LCO"



### TSTF-505 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 Watts Bar TS do not have
- Instrumentation RAs invoked for different Functions or wording that a RICT applies to
- RICTs not applied since Additional Justifications weren't met (e.g., not having a Shutdown PRA), or loss of function could not be confirmed
- Corrections to obvious minor traveler errors
- Different Conditions nested with the new default Conditions of TS 3.3.1 and 3.3.2



#### TSTF-505 Variations (continued)

#### Five technical variations are being taken

- Instrumentation RAs that are not in STS meet the criteria for applying a RICT
- RHR spray trains are not included in STS but are RICT eligible
- DG DC battery chargers are not included in STS, but are RICT eligible
- DG DC trains are not included in STS, but are RICT eligible
- AC electrical power distribution subsystems inoperable due to AC shutdown board inoperability is not a Condition in STS, but is RICT eligible



## Other changes

#### TSTF-439 is included

- Traveler is cited as prerequisite for applying RICT to RAs with second completion times.
- Technical justification is incorporated as a different "standalone" section of the LAR
- Affects 8 RAs that will allow an RICT to be applied to
- Seven administrative variations of inconsequential nature
- Consistent approach used with the Browns Ferry RICT LAR



# 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-Sa-2009 with 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)
- Screening performed based on approved WBN 10 CFR 50.69 LAR (as updated for the as-built, as-operated plant) (ML18334A363)



#### 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 Monitor Software
- Incorporates RICT Calculation Based on CDF and LERF for Units 1, and 2 with maximum 30-day backstop



#### **Schedule**

- Projected submittal in December 2024 with a requested approval within one year
- A 180-day implementation period is proposed



#### **Summary**

- TSTF-505 LAR is scheduled to be submitted in December 2024 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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# TENNESSEE VALLEY AUTHORITY