

Informed Decisions on Plant-Specific Changes to the Current Licensing Basis, 1998," and RG 1.177, "An Approach for Plant-Specific, Risk-Informed Decision Making: Technical Specifications, 1998," in performing its review of this topical report. RG 1.177 provides a three-tiered approach to evaluate the risks associated with proposed license amendments. The first tier evaluates the probabilistic risk assessment (PRA) model and the impacts of the changes on plant operational risk. The second tier addresses the need to preclude potentially high risk configurations, should additional equipment outages occur during the AOT. The third tier evaluates the licensee's configuration risk management program (CRMP) to ensure that the removal of equipment from service immediately prior to or during the proposed AOT will be appropriately assessed from a risk perspective. RG 1.174 provided the guidelines to determine the risk level associated with the proposed change. The staff's safety evaluation (SE) dated June 16, 2000, concluded that, based on the use of bounding risk parameters for CE-designed plants, the proposed increase in the CIV AOT from 4 hours (2 or more CIVs) or 72 hours (single CIV and closed system) to 7 days does not result in an unacceptable incremental conditional core damage probability (ICCDP) or incremental conditional large early release probability (ICLERP), according to the criteria of RG 1.177, provided that certain conditions specified in the staff SE were acceptably addressed by individual licensees referencing the JAR in plant-specific submittals.

The staff's SE associated with NPSD-1168 was issued prior to the changes associated with 10 CFR 50.65(a)(4), which became effective on November 28, 2002. With the implementation of 10 CFR 50.65(a)(4), licensees are required to assess and manage the risk that may result from proposed maintenance activities. The activities necessary for implementation of 10 CFR 50.65(a)(4) satisfy and supercede a number of the conditions in the staff SE for implementing the JAR.

The approval of TSTF-373, Revision 2, followed the staff's review of CE NPSD-1168 and specified the applicable conditions to be addressed in order to implement the 7-day completion time for an inoperable CIV. These conditions are as follows:

(a) The supporting information in CE NPSD-1168-A is applicable to their plant and the specific penetrations for which the licensee is requesting an extended completion time (*i.e.*, the specific penetrations are consistent with

those analyzed per the risk guidelines of Regulatory Guide (RG) 1.177, "An Approach for Plant-Specific, Risk-Informed Decision Making: Technical Specifications," and fall within the 14 containment penetration configurations in the report).

(b) They have evaluated and substantiated that external events will not affect the results of the analysis supporting the extended completion times.

(c) Any plant-specific analyses used to support the amendment request have used an acceptable probabilistic risk analyses (PRA) quality as described in RG 1.177.

(d) Plant specific implementation of this change includes verification of the operability of the remaining CIV(s) in a penetration flow path before entering the extended completion time for corrective maintenance. Plant specific implementation of this change includes verification that the affected penetration will remain physically intact or be isolated so as to not permit a release to the outside environment.

(e) They have verified that the additive nature of multiple failed CIVs and the possibility of entering multiple allowed outage times (AOTs) have been addressed as part of the analysis.

(f) Applications that propose changes for configurations not addressed by the groups described in CE NPSD-1168-A include a plant-specific analysis to justify the completion time extension. [Note that such proposals will require staff review of the specific penetrations and related justifications for the proposed extension in completion times.]

### 3.0 Technical Evaluation

#### 3.1 Statement of Proposed Changes

The proposed changes to TS 3.6.3 include:

1. The existing Condition A, with related required action and completion time, is replaced by new Conditions A and B. The new Condition A retains the required actions and completion times of existing Required Action A; however, the new Condition A is applicable to the containment sump supply valves to the ECCS and containment spray pumps, and those penetrations that do not meet the related criteria and analyses contained in CE NPSD-1168-A. The new Required Action B retains the required actions of existing Required Action A and the completion times for existing Required Action A.2. New Condition B is the same as existing Condition A, except that it does not apply to Conditions A, E, and F. In

addition, the completion time for Required Action B.1 is 7 days.

2. Existing Required Action C is relabeled Required Action D and the completion time for Required Action C.1 (new D.1) is changed from "72 hours" to "72 hours for those penetrations that do not meet the 7-day criteria and 7 days for those penetrations that meet the 7-day criteria."

3. Existing Required Actions B, D, E, and F and references to those Actions in the specification are relabeled C, E, F, and G respectively.

#### 3.2 Evaluation of Proposed Changes

The CIV penetration configurations may be categorized into three groups. These groups are:

1. CIV penetration configurations that were not analyzed in the JAR and in the plant specific analysis;

2. CIV penetration configurations that fall within the 14 containment penetration configurations considered in the JAR; and

3. CIV penetration configurations that were not considered in the JAR but a plant specific analysis was provided to justify a 7 day completion time.

The CIVs for which no analysis was provided include the containment sump supply valves to the ECCS and containment spray pumps, valves associated with the Main Feedwater System, Main Steam Isolation Valves, and [list of plant specific valves]. For these CIVs, the completion times for an inoperable valve will not change. Thus, either the 4 hour completion time of Required Action A.1 or the 72 hour completion time for Required Action D.1 will apply, depending on whether the penetration has two valves or has a single CIV within a closed system.

For those CIV penetration configurations that fall within the 14 containment penetration configurations considered in the JAR, the licensee verified that the JAR results were applicable to [plant name]. [The analysis also evaluated the risk for those CIV penetration configurations that were not considered in the JAR. The risk measures used to assess the impact of the proposed changes for these configurations in this analysis are consistent with the measures defined in RGs 1.174 and 1.177. This analysis also took into consideration plant-specific external events to show how they would affect the results of the analysis supporting the extended completion times.]

In addition, the licensee verified that the additive nature of multiple failed CIVs, and the possibility of entering multiple AOTs, had been addressed as