Enclosure 3
NRC APLA Staff Comments on Industry Proposed
10 CFR 50.69 Template for License Amendment
Request Applications
Meeting Summary of the 8/18/2016
Public Meeting

DATED September 12, 2016

U.S.NRC
United States Nuclear Regulatory Commission
Protecting People and the Environment

NRC APLA Staff Comments on Industry Proposed 10 CFR 50.69 Template for License Amendment Request Applications

Public Meeting

August 18, 2016

Clarification – other applications

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- **Industry draft template states:**

  "If applicable, include one of the two following paragraphs if it is possible to streamline the review of the PRA model in this application using the approval a previous risk-informed application such as TSTF-505 or TSTF 425 or streamline the review of the PRA model for a future submittal that will be utilizing the same models."

- **Clarification needed**
  - List all previous risk-informed applications to expedite staff access to prior reviews
  - All F&Os still need to be submitted, but staff review will incorporate previous review results

Additional Items To Be Included in the LAR

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- The LAR should address deviations, if any, from the guidance in NEI 00-04 as endorsed by RG 1.201, issued for Trial Use

- NRC approved deviations/clarifications for Vogtle pilot application:
  - License condition to add clarity to the term “sole means” in the deterministic questions from Section 9.2 of NEI 00-04
  - Order of execution of steps in the categorization process
  - Mapping of passive components to active and passive functions

Additional Items To Be Included in the LAR

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- The LAR should address plant specific aspects for the categorization process as required by NEI 00-04:
  - "Any applicable sensitivity studies identified in the characterization of PRA adequacy", as required by Section 5 and Section 3.3.1 of NEI 00-04
  - Unreliability factor value (Section 8 of NEI 00-04)
  - PRA truncation value selected and rationale
  - Plant-specific implementation and procedures
  - Completed example categorization for one system?

PRA Technical Adequacy Clarifications

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- PRA models should be assessed against RG 1.200, Revision 2
- Licensees should submit all peer review F&Os that have not been closed by a subsequent full-scope or focused-scope peer review, and address the impact of those F&Os on the application.
- If the peer reviews for internal events PRA were performed against RG 1.200 Rev. 1, the licensee should also submit all the F&OS from the self-assessment performed against RG 1.200 Revision 2.

PRA Technical Adequacy Clarifications

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- The LAR should justify how the PRA Model of Record reflects the current as-built, as operated plant.

- The LAR should demonstrate that there were no PRA upgrades that were not peer-reviewed.

Non PRA Methods Clarification

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- The LAR should provide information on how the non-PRA methods (such as IPEEE Seismic Safe Shutdown Equipment list, IPEEE hazard screening, shutdown risk) have been reviewed to ensure that they reflect the current plant design and operation practices.

- All other hazards (external flood, high winds, transportation, industrial facilities, etc.) should be addressed by the licensees in their LAR.