January19, 2000

Mr. Alan Hackerott, Chairman CEOG PSA Subcommittee Omaha Public Power District Ft. Calhoun Nuclear Station P.O. Box 399 Ft. Calhoun, NE 68023-0399

SUBJECT: SUMMARY OF DECEMBER 2-3, 1999 MEETING WITH CEOG PSASC

Dear Mr. Hackerott:

The purpose of this letter is to transmit a summary of a meeting with the Combustion Engineering Owners Group (CEOG) Probabilistic Safety Assessment Subcommittee(PSASC). The meeting took place at the Florida Power and Light offices in Juno Beach, Florida, on December 2-3, 1999.

Sincerely,

/RA/

William D. Beckner, Chief Technical Specifications Branch Office of Nuclear Reactor Regulation

Enclosures: 1. CEOG PSASC Meeting Summary

2. Attendance List

3. Meeting Presentations

cc: See attached list

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NAME	NVGilles	RLDennig	WDBeckner
DATE	01/19/2000	01/ 19/2000	01/19/2000

#### OFFICIAL RECORD COPY

cc: Mr. Gordon C. Bischoff, Project Director
CE Owners Group
ABB Combustion Engineering Nuclear Power
M.S. 9615-1932
2000 Day Hill Road
Post Office Box 500
Windsor, CT 06095

Mr. Ralph Phelps, Chairman CE Owners Group Omaha Public Power District P.O. Box 399 Ft. Calhoun, NE 68023-0399

Mr. Ian C. Rickard, Director Nuclear Licensing ABB Combustion Engineering Nuclear Power 2000 Day Hill Road Post Office Box 500 Windsor, CT 06095

Mr. Charles B. Brinkman, Manager Washington Operations ABB Combustion Engineering Nuclear Power 12300 Twinbrook Parkway, Suite 330 Rockville, MD 20852

Mr. Ray Schneider ABB Combustion Engineering Nuclear Power 1000 Prospect Hill Road P.O. Box 500 Windsor, CN 06095-0500

Mr. Paul Hijeck ABB Combustion Engineering Nuclear Power 1000 Prospect Hill Road P.O. Box 500 Windsor, CN 06095-0500

# COMBUSTION ENGINEERING OWNERS GROUP (CEOG) PROBABILISTIC SAFETY ASSESSMENT SUBCOMMITTEE (PSASC) MEETING SUMMARY December 2-3, 1999

A meeting between the CEOG PSASC and NRC staff was held on December 2-3, 1999. The attendees are listed is Enclosure 2. Copies of the meeting presentations are contained in Enclosure 3.

The PSASC presented the status all of the CEOG risk-informed technical specification (TS) Joint Application Reports that are currently with the NRC for review or that are under preparation by the CEOG. This includes proposals for allowed outage time extensions for the containment spray system, the high pressure safety injection (HPSI) system, containment isolation valves, and batteries. The group discussed the review of the HPSI AOT extension and the fact that the proposed AOT would cause many of the plants to exceed the guidelines for risk metrics in Regulatory Guide 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis," and Regulatory Guide 1.177, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications". The group also discussed the fact that real plant operational risk will be controlled through implementation of a configuration risk management program as will be required when the revised maintenance rule (10 CFR 50.65) goes into effect. The group also briefly discussed some technical issues associated with the draft battery TS Joint Application Report that were identified by the industry.

The PSASC initiated a discussion of CEOG tasks to support probabilistic risk assessment (PRA) quality. The group discussed the status of the effort to develop a PRA standard which is being coordinated by the American Society of Mechanical Engineers (ASME). Members of the PSASC involved with this activity indicated that the parties were having difficulty reaching a consensus on some key issues. The group also discussed the CEOG development of their own PRA standards and what benefit there might be to submitting such standards to the NRC for review. No conclusions were reached on this subject. The staff mentioned that it was considering looking more closely at thermo-hydraulic analyses done to support plant PRAs.

Some PSASC members involved with the industry's Risk-Informed Technical Specification Task Force (RITSTF) presented the objectives and status of initiatives that the task force is working on. The CEOG is taking the lead on many of the Task Force initiatives. The PSASC stated that they intended to continue to work with the staff on CEOG risk-informed Joint Application Reports that covered RITSTF initiatives the same as they have in the past. The RITSTF initiatives will also eventually come to the staff for review in the form of proposed changes to the standard technical specifications. The PSASC representative from Southern California Edison provided some additional details regarding the participation of SCE's San Onofre Nuclear Generating Station (SONGS) in the RITSTF initiatives. SONGS has volunteered to be a lead plant for a large number of the initiatives.

The group discussed the industry's implementation of the revised maintenance rule, 10 CFR 50.65(a)(4). The PSASC stated that the guidance that they had developed for implementation of the Configuration Risk Management Program (CRMP) in accordance with Regulatory Guide 1.177 would serve as the foundation for development of maintenance rule guidance for CE plants. The PSASC stated that their CRMP guidance had been given to

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members of the Nuclear Energy Institute who had developed the recent industry guidance for complying with the 10 CFR 50.65(a)(4).

On the second day of the meeting the PSASC discussed the CEOG PRA certification process. The certification process involves a peer review of each licensee's PRA. The group discussed the relationship between the peer review process and the ASME PRA standard. The PSASC members stated that the CEOG peer reviews are likely to be completed before the ASME PRA standard is finalized.

Finally, the group discussed the CEOG PRA cross-comparison process and its role in addressing the PRA quality issue. The NRC staff stated that they needed a traceable quality process open to NRC review in order to give credit for the process in risk-informed applications. The PSASC said that they would consider ways to make the cross-comparison information available to the NRC staff.

The PSASC members stated that their next meeting would be held April 5-7, 2000 at the ABB-CE offices in Windsor, CT.

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# **Meeting Attendees**

<u>Name</u> <u>Affiliation</u>

Ray Schneider ABB-Combustion Engineering
Alan Hackerott Omaha Public Power District
Paul Hijeck ABB-Combustion Engineering

Bruce Mrowca Baltimore Gas & Electric Howard Brodt Entergy-Waterford

Ching Guey Florida Power & Light

Bob Lindquist Arizona Public Service Mike Lloyd Entergy-ANO

Mahmoud Heiba Florida Power & Light
Ken Frehafer Florida Power & Light
Brien Vincent Florida Power & Light
Bob White Consumers Energy

Gary Chung Southern California Edison
David Finnicum ABB-Combustion Engineering

Mark RubinNRC/NRR/SPSBMillard WohlNRC/NRR/SPSBRobert DennigNRC/NRR/RTSB

Nanette Gilles NRC/NRR/RTSB

# Enclosure 3 Meeting Presentations