



Risk-Informed Tech. Specs. SCE PRA Group Vision

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Vision

- *Optimize power production and reduce regulatory burden while continuing to maintain nuclear safety which is sufficient and adequate to protect the health and safety of the public by risk informing the technical specifications*
- This vision currently represents the input of the SCE PRA group and does not represent those of SCE executive management.

Seven Initiatives

- I-1: Appropriate Shutdown End States
- I-2: Missed Surveillance
- I-3: Power Ascension Mode Restraints
- I-4: Floating AOT (using CRMP) with Backstops
- I-5: Relocate SRS/STIs to Licensee Controlled Program
- I-6: 3.0.3 shutdown. - make 24 hours for most 3.0.3 and put into individual TSs
- I-7: Operable vs. Functional

Purpose of RI-TS Project

■ Improve Regulatory Efficiency (RG 1.174):

- Reduce unneeded shutdowns (I-2,4,5,6,7)
- Limit unnecessary transfers to mode 5 while maintaining plant safety(I-1)
- Limit NOED submittals (I-4,7)
- Remove restraints to return to power (I-3)
- Reduce TS violations (I-2,4,5,6,7)
- Optimize surveillances (I-5)

Purpose of RI-TS Project (con't)

- While, ensuring any risk increases are small (RG 1.174).
 - Some changes may be risk reductions (Init. 1,4,6)
 - Forced shutdowns will result in a risk increase, and should be avoided except for a few configurations.
 - Surveillance Test Optimization would be performed similar to RI-IST programs.
 - Integration with Maintenance Rule and CRMP will ensure risk is managed wisely.

Short Term Goal

- Test the water with the first 3 initiatives:
 - See how easy the “easy” initiatives are
- Submit more difficult initiatives requiring multi-discipline review:
 - Test 3.0.3 (Issue 6) to gauge how difficult the Initiative 4 submittal will be.
- Progress on short term initiatives is important and necessary to develop momentum for long term initiatives.

Long Term Goal

- Initiative 4: Several options are available:
 - CRMP with backstops
 - CRMP with no backstops
 - Hybrid
- Initiative 5: Relocate and optimize SRs.
- Expecting wholesale changes to Tech. Specs:
 - Should be simpler, and more flexible (i.e. reduced burden).

10CFR50.36

- A majority of the technical specification regulatory inefficiencies can be removed without modifying 10CFR50.36 with the seven (7) initiatives suggested.
- Additional initiatives may need to be suggested based on the outcome of Initiative 4
 - It is premature to suggest additional initiatives (beyond the seven initiatives) without significant infrastructure and specific detail development work performed on Initiative 4

10CFR50.36 (con't)

- Prior to pursuing Part 50.36 changes (if any), the industry should:
 - Determine regulatory inefficiencies that require a part 50.36 change to correct.
 - Determine if the part 50.36 change is cost-beneficial.
- CRMP issues need to be addressed through Maintenance Rule and Issue 4, prior to using a CRMP based approach.

Summary

A large part of our vision:

“Optimize power production and reduce regulatory burden while continuing to maintain nuclear safety sufficient and adequate to protect the health and safety of the public by risk informing the technical specifications”

can be met by adoption of the seven initiatives of the risk-informed technical specification task force (RITSTF)