



# **EXTENDED POWER UPRATE REVIEW STANDARD**

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**NRR Briefing for**

**Advisory Committee on Reactor Safeguards**

**Subcommittee on T/H Phenomena**

**August 19, 2003**



# OPENING REMARKS

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**William H. Ruland**

**SES Program Champion for Power Upgrades  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation**



# **MEETING AGENDA (Morning Session)**

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- **Opening Remarks - W. Ruland**
- **Development of RS-001 - M. Shuaibi**
- **Containment Review Considerations - R. Lobel**
- **Mechanical Engineering - K. Manoly**
- **Plant Systems - J. Tatum**
- **Risk Evaluation - D. Harrison**



# **MEETING AGENDA (Afternoon Session)**

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- **Materials Engineering - T. Sullivan**
- **Reactor Systems - S. Peters**
- **Human Factors - R. Eckenrode**
- **Power Ascension & Testing - K. Coyne**
- **ACRS and Public Comments - M. Shuaibi**
- **Closing – W. Ruland**



# DEVELOPMENT OF RS-001

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**Mohammed Shuaibi**

**Lead Project Manager for Power Upgrades**

**Project Directorate III-1**

**Division of Licensing Project Management**



# DEVELOPMENT OF RS-001

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- **Background**
- **Purpose of a Review Standard**
- **Development of the EPU Review Standard**
- **Contents of the EPU Review Standard**



# BACKGROUND

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- **Maine Yankee Lessons Learned**
- **Template Safety Evaluations**
- **SECY-01-0124, dated July 9, 2001**
- **Commission Meeting with ACRS, December 5, 2001**
- **ACRS Letters on EPU Reviews**
- **SECY-02-0106, dated June 14, 2002**



# BACKGROUND (Continued)

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- **ACRS Meeting, July 2002**
- **ACRS Meeting, December 2002**
- **Issued RS-001 for Public Comment, December 2002**
- **Comment Period, December 2002 to March 2003**
- **Evaluated Public Comments and Finalized RS-001**
- **Briefing ACRS on RS-001, August/September 2003**





# PURPOSE OF A REVIEW STANDARD

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- **Provide:**
  - **Comprehensive Guidance**
  - **Mechanism for Retention of Institutional Knowledge**
  - **Technical Review Criteria and Procedural Guidance**
  - **Updated Guidance**



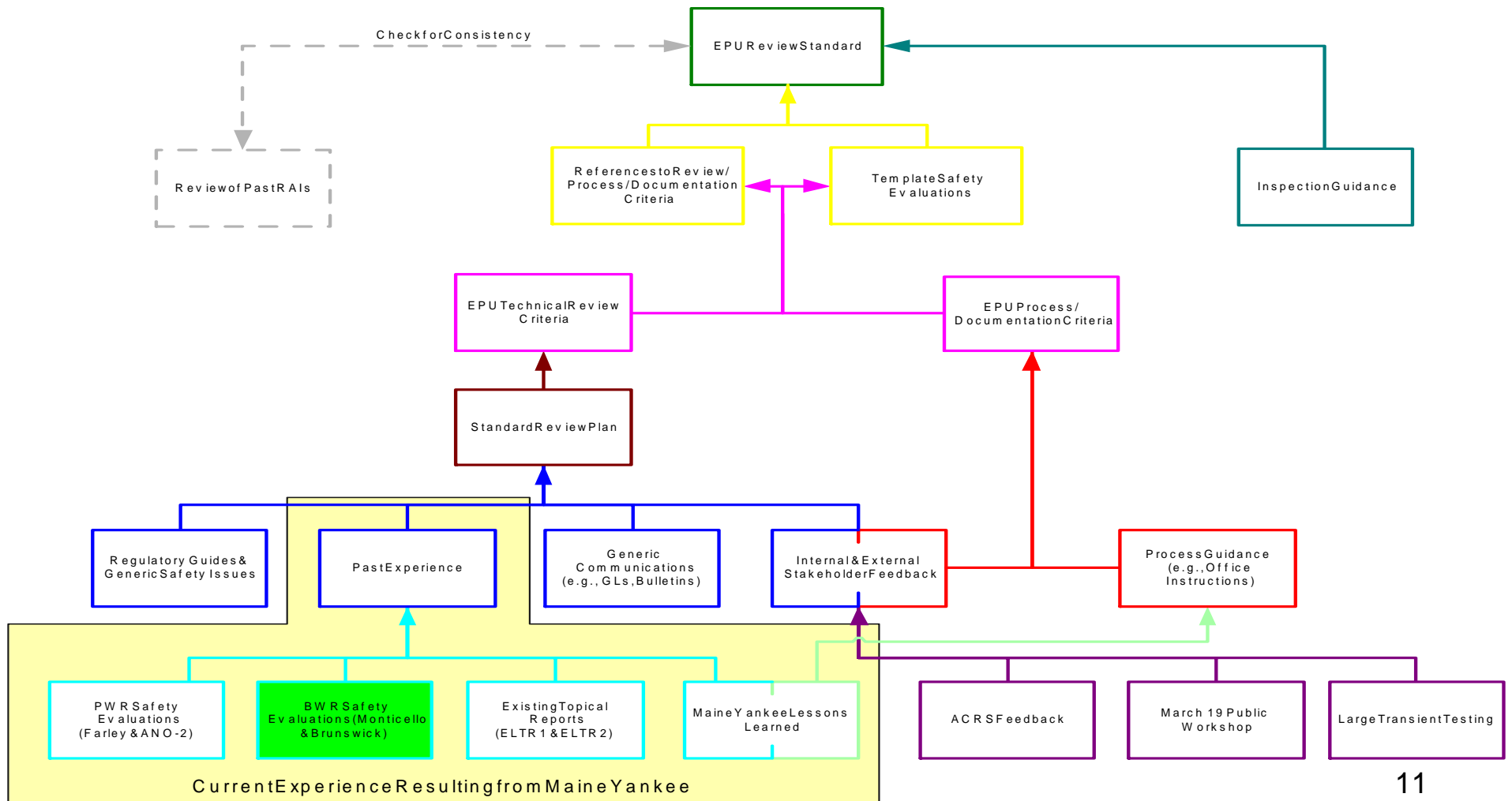
# PURPOSE OF A REVIEW STANDARD (Cont'd)

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- **Increase Effectiveness and Efficiency of Reviews by:**
  - **Implementing NRR's Vision for Centralized Work Planning**
  - **Improving Focus, Consistency, Completeness, and Thoroughness of Reviews**
- **Improve Documentation of Reviews**



# DEVELOPMENT OF RS-001





# CONTENTS OF RS-001

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## REVIEW STANDARD FOR EXTENDED POWER UPDATES



# CONTENTS OF RS-001





# CONTENTS OF RS-001

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*Areas of Review*

*Acceptance Review Checklist*

*Responsible NRR Review Branches*

*Guidance Documents*

*Guidance for Independent Analyses*

**SECTION 2  
TECHNICAL REVIEW GUIDANCE**

**SECTION 1  
DOCUMENTATION OF REVIEW**

**SECTION 3  
INSPECTION GUIDANCE**



# CONTENTS OF RS-001

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*Standardize Format and Content*

*Provide Regulatory Evaluation and Conclusion for Each Area of Review*

*Technical Evaluation Provided After Review*

*Consistent with NRR Guidance*

## **SECTION 3 DOCUMENTATION OF REVIEW**

**SECTION 2  
INSPECTION GUIDANCE**



# CONTENTS OF RS-001

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*Inspection Procedure for Power Upgrades*

*Documentation Highlights Recommended  
Areas for Inspection*

**SECTION 4  
INSPECTION GUIDANCE**





# CONTAINMENT REVIEW CONSIDERATIONS

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**Review Guidance - Matrix 6**  
**BWR Safety Evaluation - Insert 6**  
**PWR Safety Evaluation - Insert 6**

**Richard Lobel**  
**Containment & Accident Dose**  
**Assessment Section**  
**Probabilistic Safety Assessment Branch**



# Containment Review Considerations

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## Scope of Review

- **Peak Containment Pressure and Temperature Analyses**
  - LOCA
  - MSLB
- **Subcompartment Analysis**
- **Combustible Gas Control**
- **Containment Heat Removal**
  - Containment Spray System
  - Containment Fan Cooler System



# Containment Review Considerations

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## Scope of Review - Continued

- **Minimum Containment Pressure**
  - Input to 10 CFR 50.46 LOCA Analysis
- **Net Positive Suction Head**
- **Environmental Qualification Envelope**
- **BWR Suppression Pool Hydrodynamic Loads**
- **BWR Drywell Bypass**



# Containment Review Considerations

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## Analytical Methods

### BWRs

- **Mark I Containment Load Definition Report**
- **GE Pressure Suppression Containment Analytical Model (NEDO-10320, April 1971)**
- **GE Mark III Pressure Suppression Containment System Analytical Model (NEDO-20533, June 1974)**
- **SHEX**



# Containment Review Considerations

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## Analytical Methods

### PWRs

- **COPATTA (Bechtel)**
- **COCO (Westinghouse)**
- **LOTIC (Westinghouse)**
- **TMD (Westinghouse)**
- **LOCTIC (Stone & Webster)**
- **CONTRANS (Combustion Engineering)**
- **GOTHIC (EPRI)**



# Containment Review Considerations

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## New Models

- **Necessary to Recover Margin to Accommodate Increase in Power Level**
- **Emphasis on Physical Phenomena Rather than Empirical Correlations**
  - Forced Flow Condensation, Entrainment, Water Aerosols, Droplet Break Flow, Droplet Drop-Out From Atmosphere, Multi-Node
- **Positions Still Being Developed on New Models**
  - Real Effects, Quantification, Conservatism



# Containment Review Considerations

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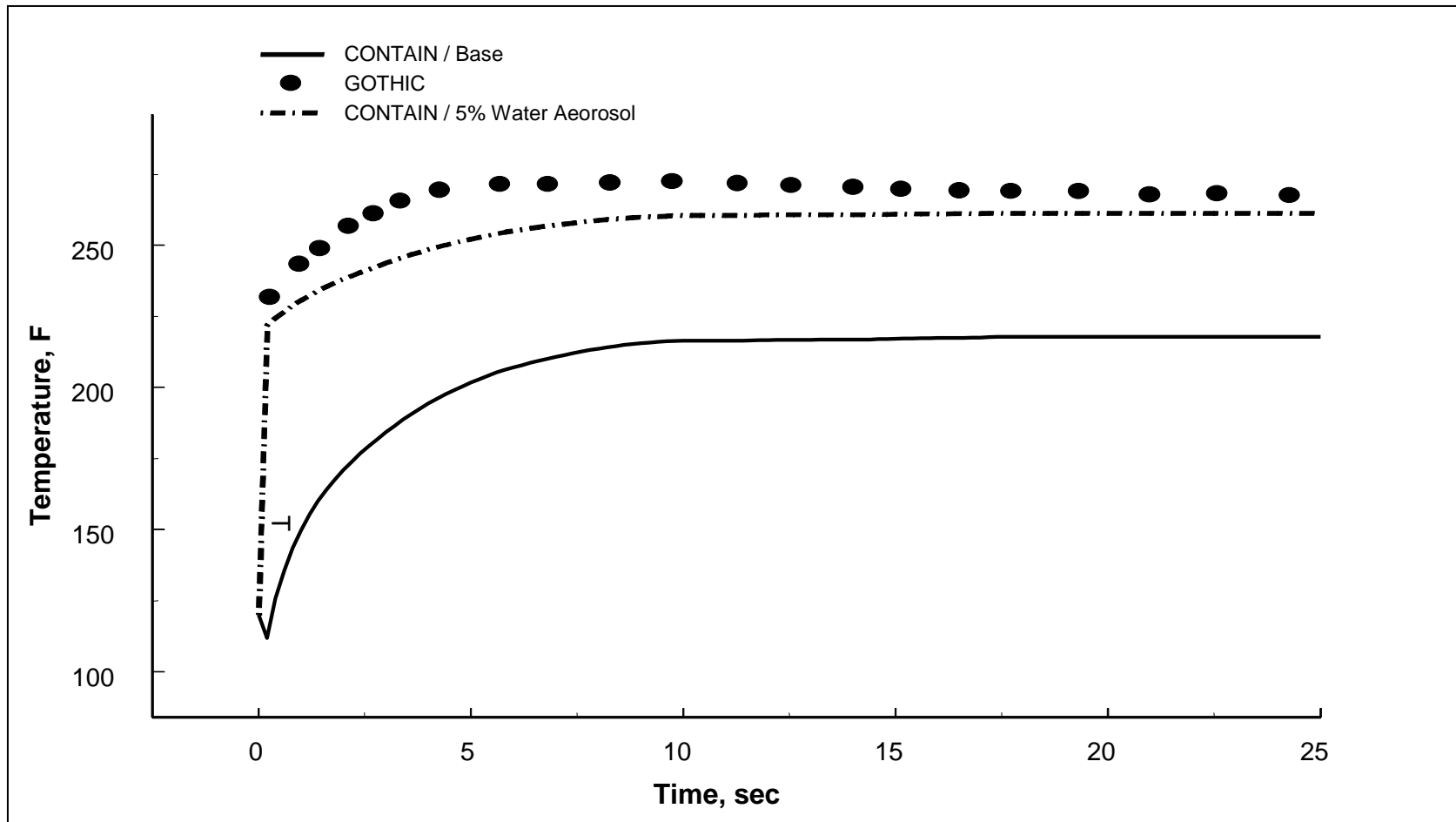
## Independent Calculations

(NRC Uses CONTAIN 2.0)

- Substantial Change in Analyses
- New Application of Method for Plant Type or Power Level
- New Type of Analysis
- First-of-a-Kind Method
- Questionable Use of Method
- Questionable Results
- Significant Reduction in Margin



# Containment Review Considerations







# MECHANICAL AND CIVIL ENGINEERING

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**Review Guidance - Matrix 2**  
**BWR Safety Evaluation - Insert 2**  
**PWR Safety Evaluation - Insert 2**

**Kamal Manoly**

**Civil and Engineering Mechanics Section**  
**Mechanical and Civil Engineering Branch**



# Mechanical and Civil Engineering

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## Scope of Review

- **Reactor Vessel, Nozzles, and Supports**
- **Reactor Internal components and Core Support Structures**
- **Control Rod Drive Mechanisms**
- **Steam Generator, Nozzles, and Supports (PWR)**



# Mechanical and Civil Engineering

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## Scope of Review - Continued

- **Reactor Coolant Pump, Nozzles and Supports (PWR)**
- **Pressurizer, Nozzles and Supports (PWR)**
- **Reactor Recirculation Pumps and Supports (BWR)**
- **NSSS and BOP Piping, Components and Supports**
- **Safety Related Valves (MOVs, AOVs, and SRVs)**



# Mechanical and Civil Engineering

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## Technical Areas Reviewed

- **Evaluation Methodology and Loadings (including normal, transient and accident loads)**
- **Calculated Stresses and Cumulative Fatigue Usage Factors**
- **Acceptance Criteria, Codes and Applicable Addenda**



# Mechanical and Civil Engineering

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## Technical Areas Reviewed - Continued

- **Functionality and Impact of EPU on Previous Responses to Generic Communication (i.e., GLs 88-11, 89-10, 95-07 and 96-06)**
- **Impact of EPU on Postulated Pipe Rupture Locations**
- **Impact of EPU on Dynamic Responses of Structures, and Qualification of Mechanical and Electrical Equipment**



# Mechanical and Civil Engineering

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## Flow Induced Vibration

- **Flow Induced Vibration on BWR Reactor Steam Dryers/Separators and Other Reactor Internal Components**
  - FW Sparger, Jet Pump, Core Spray Sparger, Core Spray Piping, Fuel Assembly, Dryer Support Brackets, Dryer Guide Rods, Shroud Head Guide Rods, and Instrument Nozzles**
- **Flow Induced Vibration on Steam Separators/Dryers Inside PWR Steam Generator (where applicable) and Primary/Secondary Heat Exchanger Tubes (e.g., u-bend tubes)**



# Mechanical and Civil Engineering

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## Flow Induced Vibration - Continued

- **Pressure Pulsations due to Increased Recirculation Pump Vane Passing Frequency on BWR Jet Pump Sensing Lines and Jet Pump Riser Brace**
- **Main Steam Line, Associated Components (including MSIV, PORVs and HPCI and RCIC Isolation Valves) and Attached Piping that may be Susceptible to FIV due to EPU**



# Mechanical and Civil Engineering

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## Structural Integrity of BWR Dryer

- **Steam Dryer Designed to Maintain its Structural Integrity During a Steam Line Break**
- **Significant Increase in Steam Flow Rate Due to EPU Conditions**
- **GE SILs Recommend Visual Inspection of Steam Dryer for any Evidence of Cracking during each Refueling Outage**





# Mechanical and Civil Engineering

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## Structural Integrity of BWR Dryer – Cont'd

- **In Light of Quad Cities Unit 2 Steam Dryer Failures, Staff will Review Licensee's Actions to Address the Effects of FIV and Acoustic Vibration on Affected Reactor Internal Components**
- **Staff is Interacting with GE and BWROG to Assess Generic Implications of the Quad Cities Steam Dryer Failures and the Need to Establish Additional Regulatory Actions**



# Mechanical and Civil Engineering

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## Pipe Stress Evaluation

- **Affected NSSS and BOP Piping Systems, Components and Supports**
- **Evaluation Methodology, Assumptions, Load Combinations, and Computer Codes**
- **Flow Induced Vibration due to the Increased MS and FW Flow and Higher FW Temperature for EPU**



# Mechanical and Civil Engineering

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## Pipe Stress Evaluation - Continued

- **Pipe Stresses and CUFs for the EPU, Acceptance Criteria, Applicable Codes and Standards**
- **Pipe Support Evaluations for Higher EPU Thermal Loads and the Increased MS and FW Flow**
- **Pipe Support Modifications (where necessary) to be Completed Prior to Implementation of the EPU**



# PLANT SYSTEMS

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**Review Guidance - Matrix 5**  
**BWR Safety Evaluation - Insert 5**  
**PWR Safety Evaluation - Insert 5**

**James Tatum**  
**Balance of Plant Section**  
**Plant Systems Branch**



# Plant Systems

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## Scope of Review

- **Flood Protection**
- **Equipment and Floor Drainage System**
- **Circulating Water System**
- **Internally Generated Missiles (Outside Containment)**
- **Internally Generated Missiles (Inside Containment)**
- **Turbine Generator**
- **Protection Against Postulated Piping Failures in Fluid Systems Outside Containment**



# Plant Systems

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## Scope of Review - Continued

- **Fire Protection Program**
- **Pressurizer Relief Tank**
- **Fission Product Control Systems and Structures**
- **Main Condenser Evacuation System**
- **Turbine Gland Sealing System**
- **MSIV Leakage Control System**
- **Spent Fuel Pool Cooling and Cleanup System**



# Plant Systems

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## Scope of Review - Continued

- **Station Service Water**
- **Reactor Auxiliary Cooling Water Systems**
- **Ultimate Heat Sink**
- **Auxiliary Feedwater System**
- **Main Steam Supply System**
- **Main Condenser**
- **Turbine Bypass System**



# Plant Systems

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## Scope of Review - Continued

- **Condensate and Feedwater System**
- **Gaseous Waste Management Systems**
- **Liquid Waste Management Systems**
- **Solid Waste Management Systems**
- **EDG Fuel Oil Storage and Transfer System**
- **Light Load Handling System**





# Plant Systems

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## Fire Protection Program

(SRP Section 9.5.1 + Suppl. Guidance in RS-001)

- Review Guidance Supplemented to Include Confirmation of Program Elements NOT Affected by EPU
- Review Guidance Supplemented to Caution that Revised Fire Analyses May Be Needed When Less Than Full Capability Systems Are Relied Upon



# Plant Systems

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## Fire Protection Program - Continued

(SRP Section 9.5.1 + Suppl. Guidance in RS-001)

- **Review Guidance Supplemented to Caution that EPU May Impact Post-Fire Safe Shutdown Procedures (e.g., Allowable Time for Operators to Take Action)**



# Plant Systems

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## Spent Fuel Pool Cooling

(SRP Section 9.1.3 + Suppl. Guidance in RS-001)

- Review Guidance Supplemented with Resolution of GSI-173A
- Review Guidance Supplemented to Identify Bounding Spent Fuel Pool Cooling Scenarios



# Plant Systems

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## Station Service Water and Reactor Auxiliary Cooling Water Systems (SRP Sections 9.2.1 and 9.2.2 + GLs 89-13 and 96-06)

- Review Guidance Supplemented to Address Validity of GL 89-13 Programs at EPU Conditions
- Review Guidance Supplemented to Address Waterhammer and Two-Phase Flow Conditions for EPU



# RISK EVALUATION

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**Review Guidance - Matrix 13**  
**BWR Safety Evaluation - Insert 13**  
**PWR Safety Evaluation - Insert 13**

**Donald Harrison**  
**Safety Programs Section**  
**Probabilistic Safety Assessment Branch**



# Risk Evaluation

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## Purpose of Review

- **Verify that Risks Associated with Proposed EPU are Acceptable**
- **Determine if “Special Circumstances” are Created**



# Risk Evaluation

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## Scope of Review

- **Internal Events**
  - Initiating Event Frequencies
  - Component Reliability
  - Success Criteria
  - Operator Actions (HEPs)
- **External Events**
  - Seismic Events
  - Fires
  - High Winds, Floods, and Other Events



# Risk Evaluation

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## Scope of Review - Continued

- Shutdown Operations
- PRA Quality





# Risk Evaluation

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## Guidance

- **Matrix 13 in RS-001 and Attachments**
- **RG 1.174**
- **SRP Chapter 19**
- **RIS 2001-02**



# Risk Evaluation

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## Independent Calculations/Audits

- **Potentially Significant Risk Impact Identified**
- **Questionable Results**
- **Questions Regarding PRA Quality**
- **Augment Non-PRA Methods (e.g., Seismic Margins Analysis)**
- **Special Circumstances Identified Per Appendix D of SRP Chapter 19**



# MATERIAL AND CHEMICAL ENGINEERING

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**Review Guidance - Matrix 1**  
**BWR Safety Evaluation - Insert 1**  
**PWR Safety Evaluation - Insert 1**

**Edmund Sullivan**

**Materials and Chemical Engineering Branch**



# Materials and Chemical Engineering

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## Scope of Review

- Reactor Vessel Materials Surveillance Program
- Pressure-Temperature (P-T) Limits and Upper Shelf Energy (USE)
- **Pressurized Thermal Shock (PTS)**
- Reactor Internals and Core Support Materials
- Reactor Coolant Pressure Boundary Materials
- Leak-Before-Break



# Materials and Chemical Engineering

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## Scope of Review - Continued

- Protective Coatings Systems
- **Flow Accelerated Corrosion (FAC)**
- Steam Generator Tube Inservice Inspection
- Steam Generator Blowdown System
- Chemical and Volume Control System
- Reactor Water Cleanup System



# Materials and Chemical Engineering

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## PTS

(PWRs Only)

- Evaluate Effects of Increased Fluence on  $RT_{PTS}$
- Ensure Calculated  $RT_{PTS}$  Complies with 10 CFR 50.61
  - Methodology
  - Screening Criteria
- Ensure Structural Integrity of Reactor Coolant Pressure Boundary



# Materials and Chemical Engineering

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## FAC

(NSAC-0202L-R2)

- Evaluate Effects of Changes in Flow Rates and Thermodynamic Conditions in Piping on FAC Corrosion Rates
- Evaluate Licensee Modeling/Monitoring Programs
- Ensure Structural Integrity of Systems



# Materials and Chemical Engineering

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## Independent Calculations

- $RT_{PTS}$
- Upper Shelf Energy





# REACTOR SYSTEMS

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**Review Guidance - Matrix 8**  
**BWR Safety Evaluation - Insert 8**  
**PWR Safety Evaluation - Insert 8**

**Sean Peters**  
**Zena Abdullahi**  
**Reactor Systems Branch**



# Reactor Systems

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## Scope of Review

- **Fuel System Design**
  - **Normal Operation and AOOs**
    - SAFDLs
  - **Non-LOCA Accidents**
    - Limited Fuel Failure
  - **LOCAs**
    - 10 CFR 50.46



# Reactor Systems

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## Scope of Review - Continued

- **Nuclear Design**
  - **Normal Operation and AOOs**
    - SAFDLS
  - **Reactivity Accidents**
    - No RCPB Failure
    - Core Coolability Maintained



# Reactor Systems

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## Scope of Review - Continued

- **Thermal-Hydraulic Design**
  - Analytical Methodology
  - Thermal-Hydraulic Stability
  - Hydraulic Loads - Core, RCS Components
  - Normal Operations and AOOs
    - Margin of Safety from Fuel Damage
      - DNBR, CHF



# Reactor Systems

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## Scope of Review - Continued

- **Systems**
  - CRDM
  - RCIC
  - RHR
  - ECCS
  - SLCS
  - Overpressure Protection



# Reactor Systems

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## Scope of Review - Continued

- **SRP Chapter 15 Accidents and Transients**
  - AOOs, Non-LOCAs, LOCAs
  - Codes and Methodologies
    - Approved for Plant-Specific Applications
    - Implementation Complies with Limitations, Restrictions, and Conditions Specified in Approving SE
    - Assumptions Account for Changes Caused by EPU



# Reactor Systems

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## Scope of Review - Continued

- **Other**
  - **ATWS**
    - **BWR - Instability**
    - **PWR - Plants without DSS**
  - **Spent Fuel/New Fuel Storage**
  - **Fluence**



# Reactor Systems

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## Audits and Independent Calculations Analyses and Methodologies

- **First-of-a-Kind Methodologies**
- **New Application of Method for Plant Type, Power Level, or Power Density**
- **Deviations Not Previously Approved**
- **Applicability Extended Beyond Approved Limits**
- **Assumptions**
- **Questionable Results**
- **Significant Reduction in Margin**





# HUMAN FACTORS

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**Review Guidance - Matrix 11**  
**BWR Safety Evaluation - Insert 11**  
**PWR Safety Evaluation - Insert 11**

**Richard Eckenrode**  
**Operator Licensing and**  
**Human Performance Section**  
**Reactor Operations Branch**



# Human Factors

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## Approach for Review

- **Standard Set of Questions Specific to Areas of Interest**
- **Review Guidance**
  - SRP 13.2.1, “Reactor Operator Training”
  - SRP 13.2.2, “Training for Nonlicensed Plant Staff”
  - SRP 13.5.2.1, “Operating and Emergency Operating Procedures”
  - SRP 18, “Human Factors Engineering”



# Human Factors

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## Scope of Review

### Changes To:

- **Emergency and Abnormal Operating Procedures**
- **Operator Actions Sensitive to Power Uprate**
- **Control Room Controls, Displays, and Alarms**
- **Safety Parameter Display Systems**
- **Operator Training Program and Control Room Simulator**



# Human Factors

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## Sensitive Operator Actions

**Describe any new operator actions required as a result of the proposed EPU. Describe changes to any current operator actions related to emergency or abnormal operating procedures that will occur as a result of the proposed EPU.**

**(i.e., Identify and describe operator actions that will require additional response time or will have reduced time available. Your response should address any operator workarounds that might affect these response times. Identify any operator actions that are being automated or being changed from automatic to manual as a result of the power uprate. Provide justification for the acceptability of these changes.**



# Human Factors

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## Reduction in Time Available

- **Initial Action Time Screening (ANSI/ANS-58.8)**
- **Training/Testing Records**
- **Operating Procedures**
- **Controls, Displays, and Alarms**
- **License Examiner Review**



# Human Factors

## Time Response Calculations (ANSI/ANS-58.8)

Plant Condition	T Diagnosis	+	T Operator	+	n Manipulations
1	(Normal Operations)				
2	5 minutes	+	1 minute	+	n minutes
3	10 minutes	+	3 minutes	+	n minutes
4 and 5	20 minutes	+	5 minutes	+	n minutes



# POWER ASCENSION AND TESTING

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**Review Guidance - Matrix 12**  
**BWR Safety Evaluation - Insert 12**  
**PWR Safety Evaluation - Insert 12**

**Kevin Coyne/Robert Pettis**  
**Quality and Maintenance Section**  
**Emergency Preparedness and**  
**Plant Support Branch**



# Power Ascension and Testing

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## Scope of Review

(New SRP 14.2.1)

- **Initial Plant Testing Potentially Invalidated by EPU**
- **Plant Modifications Necessary to Support the EPU**
- **Programmatic Aspects Related to Test Program**
  - Control
  - Scheduling
  - Sequencing





# Power Ascension and Testing

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## Considerations

- **Initial Plant Testing Invalidated by the EPU**
- **Modifications for Previous EPUs Performed Under 10 CFR 50.59**
- **System/Component Performance Adequately Covered**
  - **Technical Specification Testing**
  - **Quality Assurance Programs**



# Power Ascension and Testing

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## Review Methodology

### (Power Ascension Testing - Original Licensing)

- **Identification of Initial Testing Invalidated by the EPU**
  - Initial Tests Performed at 80% Power or Greater
  - Initial Tests Performed at Lower Power Level if Invalidated
- **All Tests Identified by Above Criteria Must be Performed or Dispositioned in EPU Application**



# Power Ascension and Testing

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## Review Methodology – Continued

### (Modification Testing)

- **Demonstrate the Performance of SSCs Important to Safety Meeting All of the Following:**
  - Performance of SSC is Impacted by EPU Modification
  - SSC is Used to Mitigate AOO in Plant's Licensing Basis
  - SSC Supports a Function that Relies on Integrated Operation of Multiple Systems and Components
- **Integral Testing Should be Performed if SSC Cannot be Adequately Tested by Overlapping Individual Components or System-Level Tests**



# Power Ascension and Testing

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## Review Methodology - Continued

(Programmatic Evaluation of Proposed Testing Plans)

- Incremental Approach to Maximum Power Level
- Monitoring of Important Parameters
- Test Acceptance Criteria
- Contingency Plans



# Power Ascension and Testing

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## Review Methodology - Continued (Review of Proposed Test Exception)

- Previous Operating Experience
- Introduction of new Thermal-Hydraulic Phenomena
- Introduction of new System Interactions
- Conformance with Limitations Associated with Analytical Methods
- Testing Guidance in Vendor Topical Reports
- Risk Implications



# ACRS AND PUBLIC COMMENTS

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**Mohammed Shuaibi**

**Lead Project Manager for Power Upgrades**

**Project Directorate III-1**

**Division of Licensing Project Management**



# PUBLIC COMMENTS

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- **Draft RS-001 Issued December 31, 2002**
- **Public Comment Period Closed on March 31, 2003**
- **Received Three Comment Letters**
  - STARS (March 28, 2003)
  - NEI (March 31, 2003)
  - Framatome ANP (May 2, 2003)



# Public Comments

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## Summary

- **Backfit/Plant-Specific Licensing Bases**
- **Burden of Completing Matrices**
- **Need for Independent Calculations**
- **Use of Precedent**
- **Impact on NRC Approved Topical Reports**
- **Control of Future Changes to RS-001**
- **Pilot Initial Use**





# Public Comments

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## Summary - Continued

- **NRC Management Oversight**
- **Acceptance Review (“Sufficient Detail”)**
- **Evaluate Resulting Review Cost/RAI Savings**
- **Need for Review of Non-Licensed Plant Staff Training**
- **Stand-Alone References Section**
- **Establishing Standard Application Format**
- **NRC Fee-Billing Practices**



# ACRS COMMENTS

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- **ACRS Reviews Extended Power Uprates**
  - Historical Threshold Established as > 5 Percent
  - Staff Proposal to Link ACRS Review to Plant Design Capacity
  
- **Letters on Past EPU Reviews**
  - Duane Arnold (October 17, 2001)
  - Dresden and Quad Cities (December 12, 2001)
  - Clinton (March 14, 2002)
  - ANO-2 (March 14, 2002)
  - GE CPPU Topical Report (April 17, 2002)
  - Brunswick (May 10, 2002)



# ACRS Comments

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## Summary

- **Documentation**
- **Communication with Inspection Staff**
- **Criteria for Independent Calculation**
- **Standard Review Plan**
- **Integral Testing**
- **Transition Reload Safety Analyses**
- **Need for More Detailed Thermal/Hydraulic Models**



# ACRS Comments

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## Summary - Continued

- **Important Areas**
  - Reduction in Time Available for Operator Actions
  - Irradiation-Assisted Stress Corrosion Cracking of Internals
  - Flow-Accelerated Corrosion
  - Fatigue of Feedwater Piping
  - Containment Response
  - Local Power Oscillations
  - ATWS and ATWS Recovery



# ACRS Comments

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## Summary - Continued

- **Use of Human Reliability Models Not Approved by the NRC**
- **Ability of PRAs to Model Margin Reduction**
- **Level of Review of Risk Information/PRA Quality**
- **RG 1.174 Interpretation Issues**



# **CLOSING REMARKS**

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**William H. Ruland**

**SES Program Champion for Power Upgrades  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation**