# Surveillance Frequency Control Program Implementing Insights

Zhiping Lia,b, Mary Anne Billingsb

<sup>a</sup> Ameren Missouri (Callaway), Fulton, United States of America <sup>b</sup> STP Nuclear Operating Company, Wadsworth, United States of America

#### INTRODUCTION

- Risk Informed Technical Specification (RITS), Initiative 5b
  - provides a risk-informed, performance-based approach for licensee control of Surveillance Frequencies
- Revision 1 of NEI 04-10, Risk-Informed Method for Control of Surveillance Frequencies
  - provides guidance for implementation

#### INTRODUCTION

- Callaway's LAR for "5b" was approved in July 2011
- as of December 2017, Callaway has implemented only two surveillance interval extensions
- in 2018, Callaway approved only one surveillance interval extension
- insights and lessons learned from implementing of SFCP at Callaway will be presented

## LESSONS LEARNED SHARED BY INDUSTRY

- NextFra
  - Early involvement of system engineering and plant staff in development of procedures is necessary
  - Industry is not consistent in SFCP ownership
  - lack of understanding of the SFCP procedure/process
- Palo Verde Nuclear Generation Station
  - Data gathering: multiple organizations
  - Resource issues: manager level project leadership
  - commonly test multiple Surveillance Requirements
  - cumulative risk concerns

### INSIGHTS/LESSONS LEARNED AT CALLAWAY

- The Callaway's LAR for "5b" was approved in July 2011
- Weekly Inspection of NK large Stationary Batteries was extended to monthly in 2014
- Trip Actuating Device Operational Test (TADOT) was extended in 2016
- Extension of Integrated Engineered Safety Features Actuation System (ESFAS) Testing was approved in August 2018

## INSIGHTS/LESSONS LEARNED AT CALLAWAY

- Manager level project leadership is very helpful with resource issue
  - the chairperson of the IDP and the 5b project leader is an operations manager
- Support from operations and engineering department as well as PRA department
- Ownership and responsibilities needs to be clear in order to have an effective program
  - now PRA engineers can focus on the STRIDE PRA assessment
- Coordination from Engineering SME and PRA engineers plays a critical role in the ESFAS test interval extension evaluation
  - -with the engineering SME's help, the incremental risk for CDF reduced about 50% and for LERF reduced more than 90%.

