UNITED STATES
NUCLEAR REGULATORY COMMISSION
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS
WASHINGTON, DC 20555 - 0001

ACRSR-2177

February 22, 2006

Luis A. Reyes
Executive Director for Operations
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: STANDARD REVIEW PLAN, SECTION 14.2.1, "GENERIC GUIDELINES FOR EXTENDED POWER UPRATE TESTING PROGRAMS"

Dear Mr. Reyes:

During the 529th meeting of the Advisory Committee on Reactor Safeguards, February 9-10, 2006, we reviewed the Standard Review Plan (SRP) Section 14.2.1, "Generic Guidelines for Extended Power Uprate Testing Programs." During our review, we had the benefit of discussions with representatives of the NRC staff and the documents referenced.

RECOMMENDATION

Paragraph III.c. of SRP Section 14.2.1 should be rewritten to provide more structured and explicit guidance defining those conditions under which large transient tests would be exempted or required.

BACKGROUND AND DISCUSSION

The staff has revised SRP Section 14.2.1, making changes that are largely editorial. However, in the review of the extended power uprate (EPU) applications, it has become apparent that more clearly defined criteria are needed to specify those conditions under which it is acceptable to exempt a plant from performing a large transient test. A similar comment was made in our September 24, 2003 report to Chairman Diaz regarding the "Draft Final Review Standard for Extended Power Uprates, RS-001" in which we stated that "the criteria for integral system transient testing were vague." SRP Section 14.2.1 properly identifies the factors that would support such a decision but does not provide explicit guidance on how the decision should be made.

Large transient tests have specific objectives. They are conducted not only to test the performance of individual components and structures but also the integrated response of the system, including its control functions. Because large transient tests impose substantial hydrodynamic and thermal loads on the plant, they have associated risks and impacts on the plant. Although these risks are not high, it is appropriate to exempt the licensee from performing these tests if they provide essentially no benefit. Conversely, transient tests can identify the unexpected. It would be preferred to uncover problems during a controlled test, rather than under the conditions of an unplanned transient.

Draft SRP Section 14.2.1 identifies seven factors to be considered in determining whether a licensee should be exempted from performing a test. Although these are the appropriate factors to be considered, more explicit guidance should be provided to the reviewer as a basis for decisionmaking. Section III.c. should be rewritten to provide more structured and explicit guidance defining those conditions under which large transient tests would be exempted or required. We would like to be kept informed of the changes to SRP Section III.c. to address our concern.

Sincerely,

/RA/

Graham B. Wallis
Chairman

References:

1. Memorandum from D. Thatcher, NRR, to J. Larkins, ACRS, dated January 18, 2006, Subject: Request for the Advisory Committee on Reactor Safeguards Final Review of the Standard Review Plan 14.2.1, “Generic Guidelines for Extended Power Uprate Testing Programs”

2. Standard Review Plan (SRP) 14.2.1, “Generic Guidelines for Extended Power Uprate Testing Programs,” Rev. 1 - XXXX 2005 (ADAMS Accession No. ML051100780)

3. Letter from M. Bonaca, ACRS, to N. Diaz, Chairman, dated September 24, 2003,Subject: Draft Final Review Standard for Extended Power Uprates, RS-001 (ADAMS Accession No. ML032681204)

4. Memorandum from J. Larkins, ACRS, to L. Reyes, EDO, dated November 9, 2005 Subject: Standard Review Plan, Section 14.2.1, "Generic Guidelines for Extended Power Uprate Testing Programs,” (ADAMS Accession No. ML053170009)

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