

From: "MARION, Alex" <am@nei.org>
To: "jer1@nrc.gov" <jer1@nrc.gov>
Date: Wed, Dec 16, 1998 1:58 PM
Subject: Plant-Specific Backfit Issues

Jack,

This is the list of examples we discussed during our telephone call. Specific information for the EDG allowed outage time and TS requirements for personnel qualification are included. This list was developed by Dan Stenger and Bob Thomas of Winston & Strawn with input from utility clients involved in NUBARG. If you have any questions relative to the development of this list feel free to call Dan Stenger at (202)371-5742. Also, we would appreciate your feedback after you contact the specific utilities.

With regard to the hesitancy on the part of utilities to provide such information, I suggest you ask those listed in the enclosure.

Take care and we hope this helps you in your assessment effort.

Alex

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Examples of Plant-Specific Backfitting Issues

Control Room HVAC
Extension of AOT for EDGs
TS Requirements for Qualification of Personnel
Barrier Doors
Use of Containment Overpressure for ECCS NPSH
Fire Protection -- Multiple Spurious Actuations
Section 50.59 Positions
Seismic Qualification
Equipment Qualification

Control Room HVAC (Florida Power Corp., Crystal River 3, Technical Point of Contact: Sid Powell, Engineering, and Tim Catchpole, Nuclear Licensing; Telephone: 352-563-4601; Niagara Mohawk Power Corporation, Nine Mile Point Nuclear Station, Denise Wolniak, Manager of Licensing, 315-349-4246.)

Application of regulatory standards, e.g., GDC-19 and SRP 6.4, beyond existing plant design bases
Accident sequences postulated beyond SAR
Methodology for estimating dose
Desire to impose new standard without addressing whole issue, i.e., new source term
Compelling testing or calculations not required by SAR following hardware change or as a quid pro quo for granting an amendment request

Extension of Allowed Outage Time for Emergency Diesel Generators (Detroit Edison Company, Fermi 2, Joe Conen, Licensing, 734-586-1960.)
Configuration Risk Management Program as a quid pro quo (in an RAI) for extension of allowed outage times for emergency diesel generators
AOT extension submitted as CBLA
CBLA risk analysis performed to support burden reduction, but instead this was extremely costly
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NRC compelled a more extensive review, and
Extended outage to complete the review

TS Requirements for Qualification of Personnel (Nebraska Public Power District, Cooper Nuclear Station, Jim Sumpter, Licensing Supervisor, 402-825-5663; Detroit Edison Company, Fermi 2, Joe Conen, Licensing Manager, 734-586-1960.)
Section 6.3 of Technical Specifications (TS) includes minimum requirements for personnel, by position

Certain licensees compelled to change the applicable standard to gain approval for ITS
Generic problem handled as a plant-specific backfit
Staff did not acknowledge it as a backfit
RAI not supported by a backfitting analysis

Barrier Doors (South Carolina Electric & Gas, April Rice, Licensing Manager 803-345-4232.)
New Staff expectations for time when Barrier Doors may be open
(EQ, Security and Fire Protection issues)
Questioned licensee's established controls
Establishment of Staff position through inspection in absence of official guidance

Use of Containment Overpressure for ECCS NPSH (Rochester Gas & Electric Co., R.E. Ginna Nuclear Power Plant, Point of Contact: George Wrobel, Regulatory Affairs Manager, 716-771-3535.)
RAI issued on GL 97-04 that states specific Staff approval is required before licensees may credit containment overpressure in NPSH calculations
Licensee noted that the plant predates Reg. Guide 1.1, where the requirement for Staff approval for crediting containment overpressure in NPSH calculations is established
Staff did not identify backfitting implications for older plants
Staff finally agreed to close out the plant's response to GL 97-04 without addressing the backfit

Fire Protection

Multiple Spurious Actuations ("smart" hot shorts issue) (Entergy Operations, Brian Ford, 601-368-5766; and Les England, Licensing, 601-368-5766.)
Licensees' reading of GL 86-10 has required consideration of spurious actuations occurring one at a time
This understanding applied for many years by licensees
New Staff interpretation that Appendix R and the guidance of Generic Letter 86-10 require consideration of multiple spurious actuations due to hot shorts

Section 50.59 Backfit (TU Electric, Comanche Peak, Roger Walker, Regulatory Affairs Manager, 254-897-8233)
Screening process re trivial changes questioned despite prior Staff acceptance in Inspection Report
Backfitting claim filed -- no action

Seismic Qualification (Rochester Gas & Electric Co., R.E. Ginna Nuclear Power Plant, Point of

Contact: George Wrobel, Regulatory Affairs Manager, 716-771-3535)

GIP Method A permits application of ground response spectra for equipment in structures less than 40 feet above grade to be evaluated using 1.5 times ground response spectra as the bounding seismic analysis

The NRC has accepted the GIP and approved its methodology for bringing to closure the seismic qualification issue for USI A-46 plants

The Staff has found at certain plants, including Ginna, that a higher structure response spectra should be applied

The Staff claims the GIP is only applicable to typical structures; and

A higher response spectra should be applied to other than typical structures

The licensee may be forced to qualify equipment to a higher standard than that approved by the NRC without a backfitting analysis

Subjective application of a new level of conservatism

Undercuts the benefit that was supposed to be derived from using the GIP

Equipment Qualification (Florida Power & Light Company, St. Lucie Nuclear Station, Mitch Ross, Law Department, 561-691-7126)

Governor not included within the scope of approved Section 50.49 program

A/E inspection finding that should be within the scope of 50.49

Initially, the Staff did not agree this is was a backfit

Licensee currently understands that the Staff now agrees this is a backfit, and plans to impose the position as a compliance backfit

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