

September 28, 2001

MEMORANDUM TO: James Clifford, Chief, Section 2  
Project Directorate I  
Division of Licensing Project Management

FROM: George F. Wunder, Project Manager, Section 2 **/RA/**  
Project Directorate I  
Division of Licensing Project Management

SUBJECT: DOCUMENTATION OF ELECTRONIC CORRESPONDENCE WITH  
NORTH ATLANTIC ENERGY SERVICE CORPORATION - SEABROOK  
STATION, UNIT NO. 1 (TAC NO. MB1799)

The attached questions were sent electronically to North Atlantic Energy Service Corporation (the licensee for Seabrook Station) on October 1, 2001. After the licensee has had a chance to review the questions, we will negotiate a response date with them. At that time, the questions will be transmitted to the licensee in a formal letter.

Attachment: As stated

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## **Request for Additional Information**

1. Section 4 of the submittal indicates that EPRI is currently working with the industry to develop guidelines for reviewing and updating risk-informed programs generated using EPRI TR-112657; however, there is no statement of an updating review period for the program.
  - (a) Will you review and adjust the risk ranking of piping segments and the associated selection of welds for the RI-ISI program at a minimum on an ASME Code, Section XI specified ISI period basis?
  - (b) Will the RI-ISI program be updated every 10 years and submitted to the NRC consistent with the current ASME Code, Section XI requirements?
  - (c) Under what conditions will the RI-ISI program be resubmitted to the NRC before the end of any 10-year ISI interval?
2. Page 7 of your submittal presents the criteria for engineering evaluation and additional examinations if unacceptable flaws or relevant conditions are found during examinations. The submittal states that the evaluation will include whether or not other elements in the segment or segments are subject to the same root cause conditions. The submittal further states that additional examinations will be performed on these elements up to a number equivalent to the number of elements required to be initially inspected on the segment or segments. Please address the following:
  - (a) Please clarify the term “initially”. Specifically, does it refer to inspections planned for the current outage or the current interval?
  - (b) Please clarify how the elements will be selected for additional examinations. Specifically, please verify that the elements will be selected based on the root cause or damage mechanism and include high risk significant as well as medium risk significant elements (if needed) to reach the required number of additional elements.
3. Page 4 of your submittal states that a deviation to EPRI RI-ISI methodology has been implemented in the failure potential assessment for thermal stratification, cycling, and striping (TASCS). Please state whether or not your revised methodology for assessing TASCS potential is in conformance with the updated criteria described in EPRI letter to NRC dated March 28, 2001. Also, please confirm that as stated in the subject letter, once the final MRP guidance has been developed, the RI-ISI program will be updated for the evaluation of susceptibility to TASCS, as appropriate.
4. The safety evaluation of the Seabrook IPE stated that the loss of instrument air initiating event was not included, but would be included in a future update. However, this initiating event is not identified as having been included in the subsequent updates identified in Section 1.2 of the submittal. Has this initiating event been incorporated into the current model? If not, please explain what impact this has on this application.

**ATTACHMENT**

5. Section 3.3 of EPRI TR-112657 Rev. B-A requires the consideration of external events (e.g., seismic events) and operation modes outside the scope of the PRA (e.g., shutdown) in the categorization of segments. Were external events and operation modes outside the scope of the PRA systematically considered? Please describe how these areas were considered in the categorization process.
6. Section 3.6.1 of the submittal indicates that the pressure boundary failure likelihoods are consistent with the RI-ISI pilot applications at ANO-2 and Vermont Yankee. Were the probability of detection (POD) values used also consistent with these applications? If not, please provide the POD values used, and provide a justification for the acceptability of these values as used in this application.