

DSER Section 2

Page, Section, and Paragraph	DSER Text	Suggested Revision	Justification	Category
Section 2.0	Where LR drawings are referenced they are noted without the M-.	Generic Comment.		2
Page 2-3, Section 2.1.2.1.1 Paragraph 4	Concerning exposure duration, the applicant concluded that long-term exposure to conditions resulting from a failed NSR SSC (such as leakage or spray) is not considered credible. The basis for this conclusion is that leakage/spray would be quickly identified by plant personnel via walkdowns, sump-level trends, or system parameter monitors and alarms. Once identified, appropriate corrective actions would be taken. Therefore, only NSR SSCs whose failure could result in a failure of an SR SSC due to short-term exposure would need to be considered within the scope of license renewal pursuant to 10 CFR 54.4 (a)(2).	Modified via RAI. See CI2.1-1 Add reference to SER Section 2.1.3.	NRC 2005-0051	1
Page 2-4, Section 2.1.2.1.1 Paragraph 6	The scoping process determined that the circuit switches between the unit high-voltage station...	The scoping process determined that the circuit switchers between the unit high-voltage station...		3
Page 2-4, Section 2.1.2.1.2 Paragraph 7	DBDs such as industry codes standards and regulations	DBDs	See page 2-4 of LRA	2
Page 2-6, Section 2.1.2.1.4	The subcomponent or asset examples include:	Examples of new subcomponents or assets include:		2

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Paragraph 1				
Page 2-6, Section 2.1.2.1.4 Paragraph 4	All portions of the fuel handling system were determined to be within the scope of license renewal, and were moved to the spent fuel cooling system, the containment Units 1 and 2 building structure, or the primary auxiliary building (PAB) structure.	All portions of the fuel handling system that were determined to be within the scope of license renewal, were moved to the spent fuel cooling system, the containment Units 1 and 2 building structure, or the primary auxiliary building (PAB) structure.	See page 2-41 of LRA	1
Page 2-7, Section 2.1.2.1.4 Paragraph 1	Electrical and I&C Component Scoping. In LRA Section 2.1.2.6, the applicant described the electrical and instrumentation & control (I&C) systems' applicability to license renewal requirements. These systems are identified at specific voltage levels (<i>i.e.</i> , 13.8k VAC, 480 VAC, 125 DC)	Electrical and I&C Component Scoping. In LRA Section 2.1.2.6, the applicant described the electrical and instrumentation & control (I&C) systems' applicability to license renewal requirements. These systems are identified at specific voltage levels (<i>i.e.</i> , 13.8k VAC, 480 VAC, 125 VDC)		3
Page 2-9, Section 2.1.2.2.3 Paragraph 4	<ul style="list-style-type: none"> • 4480 VAC power system • reactor protection system 	<ul style="list-style-type: none"> • 480 VAC power system • reactor protection system, including anticipated transient without scram 		2
Page 2-17, Section 2.1.3.1.2 Paragraph 1	Specifically the procedure states...	Specifically the technical report states...	LR-TR-508 is a technical report	2
Page 2-18, Section 2.1.3.1.3 Paragraph 3	The staff reviewed the mechanical scoping methodology as described in Section 2.4 of PBNP License Renewal Process Document, LR-TR-508, Integrated Plant Assessment Methodology,	The staff reviewed the mechanical scoping methodology as described in Section 2.3 of PBNP License Renewal Process Document, LR-TR-508, Integrated Plant Assessment Methodology,	LR-TR-508	2

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	Revision 1, dated January 26, 2004.	Revision 1, dated January 26, 2004.		
Page 2-19, Section 2.1.3.1.3 Paragraph 2	The main steam system contained six intended...	The main steam system contained seven intended... Add the following bullet <ul style="list-style-type: none"> • SSCs relied upon in safety analyses or plant evaluations to perform a function that demonstrates compliance with the regulations for station blackout (10 CFR 50.63) 	LRA 2.3.4.1	2
Page 2-19, Section 2.1.3.1.3 Paragraph 2	Insert new paragraph before main steam function list	Suggest a preliminary paragraph for discussing the main steam system similar to 2nd paragraph on page 2-21.	Clarify coverage.	2
Page 2-19, Section 2.1.3.1.3, Paragraph 5	“Integrated Plant Methodology Assessment Report,” and LRA Section 2.6 .	“Integrated Plant Methodology Assessment Report,” and LRA Section 2.4 .	LRA Section 2.4	2
Page 2-21, Section 2.1.3.1.3, Paragraph 2	SSCs relied upon in safety analysis in regulating events	SSCs relied upon in safety analysis in regulated events	Typo	3
Page 2-21, Section 2.1.3.1.3, Paragraph 2	<ul style="list-style-type: none"> • NSR SSCs whose failure could prevent satisfactory accomplishment of SR components 	<ul style="list-style-type: none"> • NSR SSCs whose failure could prevent satisfactory accomplishment of SR functions 	Typo	3
Page 2-22, Section 2.1.3.2.1, Paragraph 3	The staff also reviewed LR-SCRN-746, “License Renewal Screening Report, Main and Auxiliary Steam,” Revision 0, dated August 22 , 2003,	The staff also reviewed LR-SCRN- 714 , “License Renewal Screening Report, Main and Auxiliary Steam,” Revision 0, dated August 6 , 2003,	Typo	3

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Page 2-23, Section 2.1.3.2.2, Paragraph 2	The civil/structural engineering discipline was responsible for performing the screening evaluations on the in-scope structures; crane, hoist, and lifting device systems; as well as the component supports and fire barrier groups.	The civil/structural engineering discipline was responsible for performing the screening evaluations on the in-scope structures; crane, hoist, and lifting device systems; as well as the component supports and fire barrier commodity groups.	Clarify	3
Page 2-23, Section 2.1.3.2.2, Paragraph 3	Additionally, the staff found that the methodology used to screen structural components within evaluation boundaries, with the exception of snubbers that supported a component-level intended function, were assumed to be long-lived and passive, and therefore would require an AMR.	Reword	TDM	
Page 2-23, Section 2.1.3.2.2, Paragraph 4	...for civil/structural components meets the screening criteria of 10 CFR 54.21(a)(1);...	...for civil/structural components met the screening criteria of 10 CFR 54.21(a)(1);...	Inconsistency in wording between Mechanical and Electrical	3
Page 2-24 Last Paragraph	The Staff also noted that procedure ...	The Staff also noted that report ...	Clarification	3
Page 2-28, Section 2.3.1.1.1, Paragraph 3	In addition, the Class 1 piping/components system performs functions that support fire protection (FP), station blackout (SBO), and pressurized thermal shock (PTS).	In addition, the Class 1 piping/components system performs functions that support fire protection (FP), station blackout (SBO), pressurized thermal shock (PTS) and environmental qualification (EQ) .	LRA Section2.3.1.1	2
Page 2-28,		Add the flowing bullet		2

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Section 2.3.1.1.1, Paragraph 4		<ul style="list-style-type: none"> structural integrity 		
Page 2-29, Section 2.3.1.1.1, Paragraph 1	<ul style="list-style-type: none"> RCP and valve closure 		Not in LRA table 2.3.1-1	2
Page 2-33, Section 2.3.1.3.1, Paragraph 3	<ul style="list-style-type: none"> reactor control cluster assembly (RCCA) flexures gas turbine (GT) support pin (split pin) 	<ul style="list-style-type: none"> rod control cluster assembly (RCCA) flexures guide tube (GT) support pin (split pin) 	<p>Standard terminology</p> <p>There are no gas turbine components in the internals package</p>	2
Paragraph 1 of Page 2-35, Section 2.3.1.4.1,	As such, the following systems and components are not considered as part of the pressurizer: Class 1 piping and the attachment welds to the pressurizer; nozzles/safe ends ; and instrument piping/tubing, valves, manifolds and instrumentation beyond the Class 1 boundary.	As such, the following systems and components are not considered as part of the pressurizer: Class 1 piping and the attachment welds to the pressurizer; and instrument piping/tubing, valves, manifolds and instrumentation beyond the Class 1 boundary.	Nozzles and safe ends were included in the pressurizer analyses. See listing below on page 2-35.	2
Page 2-36, Section 2.3.1.4.2, Paragraph 2	RAI 2.3.1.4-1	This should be in section 2.3.1.6. The PRT is not part of the pressurizer.	Belongs with Non-class 1 components	2
Page 2-40, Section 2.3.1.5.2, Paragraph 1	The staff reviewed LRA Section 2.3.1.5 and FSAR Section 4. The staff's review, using the evaluation methodology described in SER Section 2.3, was conducted in accordance with the guidance described in NUREG-1800,	Should CI 3.1.1-2 be included here? More scoping than aging management.		2

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	Section 2.3.			
Page 2-43, Section 2.3.2.1.1, Paragraph 4		Add the flowing bullet • level gauges	LRA Table 2.3.2-1	2
Page 2-45, Section 2.3.2.2.1, Paragraph 2		Add the following bullets • carbon steel components • level gauges	LRA Table 2.3.2-2	2
Page 2-47, Section 2.3.2.3.1, Paragraph 2		Add the following bullets • carbon steel components • fastener/bolting • filters/strainers • flow elements	LRA Table 2.3.2-3	2
Page 2-48, Section 2.3.2.4.1, Paragraph 3	In addition, the containment isolation components system performs functions that support environmental qualification.	In addition, the containment isolation components system contains equipment that is environmentally qualified.	Clarification	2
Page 2-50, Section 2.3.3.1.1, Paragraph 2 & 3	The portions of the CVCS containing components subject to an AMR extend from the RWST to the RCS, and also from the RCS to system containment isolation valves (CIVs), including the pumps, heat exchangers (HXs), piping, and valves. The in-scope portion of the CVCS system includes the flow path from the RWST, through the charging	This is a generic comment for changes with (a) (2)	NRC 2005-0051	2

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	pumps, into the RCS. CVCS lines coming from the RCS are in-scope through the CIVs.			
Page 2-50, Section 2.3.3.1.1, Paragraph 7		Add the following bullet <ul style="list-style-type: none"> • level gauges 	LRA Table 2.3.3-1	2
Page 2-51, Section 2.3.3.2.1, Paragraph 2	Functions associated with the component cooling...	System intended functions associated with the component cooling...	Clarification	2
Page 2-51, Section 2.3.3.2.1, Paragraph 3	<ul style="list-style-type: none"> • removes heat from the reactor coolant pump (RCP) thermal barrier cooling coils in order to ensure RCS integrity 	Remove Bullet - Not a safety Related function	See SER Section 2.3.1.1.2 Page 2-29 Response to RAI 2.3.1.1-1	2
Page 2-52, Section 2.3.3.2.1, Paragraph 3	The CCW system provides heat removal from safety-related heat exchangers. The failure of nonsafety-related SSCs in the system could potentially prevent the satisfactory accomplishment of a safety-related function. In addition, the CCW system performs functions that support fire protection and station blackout.	The CCW system provides heat removal from safety-related heat exchangers. The failure of nonsafety-related SSCs in the system could potentially prevent the satisfactory accomplishment of a safety-related function. In addition, the CCW system performs functions that support fire protection, environmental qualification and station blackout.	LRA Section 2.3.3.2	2
Page 2-54, Section 2.3.3.3.1, Paragraph 5		Add the following bullets <ul style="list-style-type: none"> • filters/strainers • tanks 	LRA Table 2.3.3-2	2

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Page 2-57, Section 2.3.3.4.1, Paragraph 1	<ul style="list-style-type: none"> provides for heat removal from pressure boundary of safety-related heat exchangers 	provides for pressure boundary of safety-related heat exchangers	LRA Section 2.3.3.4 and Table 2.3.3-4	2
Page 2-57, Section 2.3.3.4.1, Paragraph 2	The failure of nonsafety-related SSCs in the system could potentially prevent the satisfactory accomplishment of a safety-related function. In addition, the WD system performs functions that support environmental qualification.	The failure of nonsafety-related SSCs in the system could potentially prevent the satisfactory accomplishment of a safety-related function. In addition, the WD system contains equipment that is environmentally qualified.	LRA Section 2.3.3.4	2
Page 2-57, Section 2.3.3.4.1, Paragraph 4		Add the following bullets <ul style="list-style-type: none"> compressor casing (add) drain traps (add) restricting orifices (add) filter/strainers (add) level gauges (add) pump casing (add) sight glass (add) tanks (add) 	LRA Table 2.3.3.-4	2
Page 2-61, Section 2.3.3.5.1, Paragraph 1		Add the following bullet <ul style="list-style-type: none"> provide cooling water to spent fuel pool cooling water heat exchangers for decay heat removal 	LRA Section 2.3.3.5	2
Page 2-63, Section 2.3.3.5.2, Paragraph 3	These actuators have no effect on the pressure boundary, and are therefore outside within the scope of license renewal and not subject	These actuators have no effect on the pressure boundary, and are therefore not within the scope of license renewal and not subject to	Claify	3

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	to an AMR.	an AMR.		
Page 2-66, Section 2.3.3.6.1, Paragraph 3	The failure of nonsafety-related SSCs in the system could potentially prevent the satisfactory accomplishment of a safety-related function.	Include system functions here.	LRA Section 2.3.3.6	2
Page 2-69, Section 2.3.3.6.2, Paragraph 1	In its response, dated October 8, 2004, the applicant stated that the foam extinguishing system for the above-ground fuel oil storage tanks have been removed, and therefore is not within the scope of license renewal.	In its response, dated October 8, 2004, the applicant stated that the foam extinguishing system for the above-ground fuel oil storage tanks has been removed, and therefore is not within the scope of license renewal.	Clarification	2
Page 2-74, Section 2.3.3.6.2, Paragraph 3	The components in question (CO2 hose reel stations in the control room) are active (short-lived and consumable), routinely monitored,	The components in question (CO2 hose reel stations in the control room) are short-lived and consumable, routinely monitored,	NRC 2004-0100	2
Page 2-76, Section 2.3.3.7.2, Paragraph 7	The design of these heat exchanger components is consistent with the "Heater/Cooler" component type classification in LRA Tables 3.3.3.7 and 3.3.2-15.	The design of these heat exchanger components is consistent with the "Heater/Cooler" component type classification in LRA Tables 2.3.3.7 and 3.3.2-15.	LRA Table 2.3.3.7	2
Page 2-79, Section 2.3.3.8.2, Paragraph 4	...The applicant further stated that the drawing LR-219, sheet 1 was revised, and the error is being tracked in its corrective action program.		Word wrap error.	3
Page 2-80, Section 2.3.3.8.2,	In a telephone conference on January 18, 2005, the applicant	In a telephone conference on January 18, 2005, the applicant	LRA Table 2.5-1	2

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Paragraph 3	stated that the lines/wiring associated with POS 3930 and COS 3930 are represented under the "Commodity Group" in LRA Table 2.5-1.	stated that the lines/wiring associated with POS 3930 and CS 3930 are represented under the Commodity Group "Electric Cables and Connectors NOT subject to 10 CFR 50.49 EQ requirements," in LRA Table 2.5-1.		
Page 2-85, Section 2.3.3.10.1, Paragraph 1	<ul style="list-style-type: none"> provides climate control to areas containing safety Class 1, 2, and 3 components, namely to the inverter and station battery rooms for the VNBI subsystem 	<ul style="list-style-type: none"> provides climate control to areas containing safety Class 1, 2, and 3 components, namely to the inverter, diesel generator, and station battery rooms for the VNBI subsystem 	LRA Section 2.3.3.10	2
Page 2-89, Section 2.3.3.11.2, Paragraph 4	Drawing LR-223, sheet 3, location F-2, indicates steam traps (STP) 14....	Drawing LR-223, sheet 3, location F-2, indicates STP-14....	<p>STP does not stand for steam traps and is not referenced in RAI.2.3.3.11-1</p> <p>STP is Sewage Treatment plant.</p>	2
Page 2-89, Section 2.3.3.11.2, Paragraph 5	In its response, dated December 14, 2004, the applicant stated that drawing LR-223, sheet 3, location F-2, showing both steam traps STP-14 and STP-15 in room GO2 is a drawing error. In reality, STP-14 is located in room GO1,...	In its response, dated December 14, 2004, the applicant stated that drawing LR-223, sheet 3, location F-2, showing both STP-14 and STP-15 in the room for GO2 is a drawing error. In reality, STP-14 is located in the room for GO1,...	<p>STP does not stand for steam traps and is not referenced in RAI.2.3.3.11-1</p> <p>STP is Sewage Treatment plant.</p>	2
Page 2-93, Section 2.3.3.13.1, Paragraph 2	The fuel handling system maintains the integrity of the reactor coolant pressure boundary.	The fuel handling system ensures adequate cooling in SFP.	LRA Section 2.3.3.13	2

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Page 2-94, Section 2.3.3.14.1, Paragraph 2	The plant sampling system maintains the integrity of the reactor coolant pressure boundary. In addition, the plant sampling system performs functions that support fire protection and environmental qualification.	Add Containment boundary and Safety related HX functions	LRA Section 2.3.3.14	2
Page 2-94, Section 2.3.3.14.1, Paragraph 3	The portions of the plant sampling system that constitute a part of the containment boundary and reactor coolant pressure boundary are within the ASME Class 1 boundary and are addressed in the Class 1 piping/components system. For convenience, a few additional components within the scope of license renewal are addressed in the following parent systems: residual heat removal system, chemical and volume control system, and component cooling water system.	(Will need to revise information from new scoping.) This changes with new a(2) methodology.	NRC 2005-0051	2
Page 2-95, Section 2.3.3.15.1, Paragraph 3	The plant air system provides a primary containment boundary to prevent the release of radioactivity into the environment. In addition, the plant air system performs functions that support fire protection and station blackout.	The plant air system provides a primary containment boundary to prevent the release of radioactivity into the environment. In addition, the plant air system performs functions that support fire protection, environmental qualification , and station blackout.	LRA Section 2.3.3.15	2

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Page 2-98, Section 2.3.3.16.1, Paragraph 3	In addition, the containment hydrogen detectors and recombiner system performs functions that support environmental qualification.	In addition, the containment hydrogen detectors and recombiner system includes equipment that is environmentally qualified.	LRA Section 2.3.3.16	2
Page 2-100, Section 2.3.4.1.1, Paragraph 5		Add the following bullets <ul style="list-style-type: none"> • containment boundary • atmospheric steam dumps for cooldown 	LRA Section 2.3.4.1	2
Page 2-100, Section 2.3.4.1.1, Paragraph 3	In addition, the main and auxiliary steam system performs functions that support fire protection and station blackout.	In addition, the main and auxiliary steam system performs functions that support fire protection, environmental qualification , and station blackout.	LRA Section 2.3.4.1	2
Page 2-100, Section 2.3.4.1.1, Paragraph 5	• provides for pressure control	Pressure Control should be Pressure Boundary in LRA Table 2.3.4-1 page 2-171.	Correction to LRA Table 2.3.4-1 page 2-171. Should have been "pressure boundary", see Table 3.4.2-1 page 3-338 of LRA.	1
Page 2-102 Section 2.3.4.2.1, Paragraph 2	In addition, the feedwater and condensate system performs functions that support environmental qualification and fire protection.	In addition, the feedwater and condensate system performs functions that support environmental qualification, station blackout, anticipated transient without scram and fire protection.	LRA Section 2.3.4.2	2
Page 2-104 Section 2.3.4.2.2,	... branches off of the main feedwater headers that are 1-inch	Branches off of the main feedwater headers that are 1-inch	Clarification	3

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Paragraph 1				
Page 2-115 Section 2.4.2.1, Paragraph 4		Add the following bullet <ul style="list-style-type: none"> • Provide structural and/or functional support to safety related equipment 	LRA Section 2.4.2.	2
Page 2-152 Section 2.5.1.6.1, Paragraph 5	...providing support for the switchyard bus connecting the unit high-voltage station auxiliary transformers and the circuit switchers, and they support the circuit switches themselves.	...providing support for the switchyard bus connecting the unit high-voltage station auxiliary transformers and the circuit switchers, and they support the circuit switchers themselves.	Clarification	3
Page 2-153 Section 2.5.1.6.2, Paragraph 3	As identified by the applicant, the high-voltage insulators are associated with the in-scope portion of the offsite power system as station post insulators providing support for the switchyard bus connecting the high-voltage station auxiliary transformers and the circuit switchers, and they support the circuit switches themselves.	As identified by the applicant, the high-voltage insulators are associated with the in-scope portion of the offsite power system as station post insulators providing support for the switchyard bus connecting the high-voltage station auxiliary transformers and the circuit switchers, and they support the circuit switchers themselves.	Clarification	3