

RAI No.	EAL	Applicable Site			Issue
		Farley	Vogtle	Hatch	
1	RU1	X	X	X	<p>(1) You state "any effluent monitor" then list several of them, are there any other effluent monitors at your site?</p> <p>(2) You state "two times the alarm setpoint" then give values for each effluent monitor. Is this two times this value or is this value already the product of 2 times the alarm setpoint? (Farley & Vogtle only)</p> <p>(3) RU1.1: Why are there no setpoint values provided? (Hatch only)</p> <p>(4) RU1.2: You deleted this EAL stating you do not have radiation monitoring. This is considered a DEVIATION and must be justified more. Explain why your KAMAN monitors won't work for this EAL. (Hatch only)</p> <p>(5) The EAL Basis has information related to EAL #4 which you deleted (Farley only).</p>
2	RU2	X	X	X	<p>(1) RU2.1a – Seems to be missing the words "as indicated by the following:"</p> <p>(2) Logic in the Threshold Values should be "1 OR 2".</p> <p>(3) Escalation criteria removed from EAL Basis. This was not flagged or justified and should not be removed</p>
3	RA1	X	X	X	<p>(1) You state "any effluent monitor" then list several of them, are there any other effluent monitors at your site?</p> <p>(2) You state "200 times the alarm setpoint" then give values for each effluent monitor. Is this two times this value or is this value already the product of 200 times the alarm setpoint? (Farley & Vogtle only)</p> <p>(3) RA1.1: Why are there no setpoint values provided? (Hatch only)</p> <p>(4) RA1.2: You deleted this EAL stating you do not have radiation monitoring. This is considered a DEVIATION and must be justified more. Explain why your KAMAN monitors won't work for this EAL. (Hatch only)</p> <p>(5) The EAL Basis has information related to EAL #4 which you deleted. (Farley & Vogtle only)</p> <p>(6) Basis states that RA1.1 values are 100 times that of RU1, this is not entirely correct. (Farley only).</p>
4	RA2	X	X	X	<p>(1) You added "UNPLANNED" to RA2.1 and the EAL Basis. This is not flagged, justified, or appropriate.</p> <p>(2) Do the stated instruments have more than one alarm (i.e., downscale, low, high, etc.)? Which alarm are you referring to?</p>
5	RA3	X	X	X	<p>(1) You added "UNPLANNED" to the threshold wording. This is not flagged, justified, or appropriate.</p> <p>(2) What about CAS, SAS or the Rad Waste Control Room (if applicable) for areas of concern for RA3.1?</p>
6	RS1	X	X	X	<p>(1) You deleted guidance related to state decisions regarding the calculation of child thyroid CDE without flagging the omission or justifying the change.</p>

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7	RG1	X	X	X	(1) You are referencing EAL #4 even though you deleted it. (Farley & Vogtle only) (2) You deleted "all" from potential release pathways for EAL #1 in the EAL Basis. Are there any other potential release pathways? This was not flagged or justified. (Farley only) (3) You deleted guidance related to state decisions regarding the calculation of child thyroid CDE without flagging the omission or justifying the change.
8	CU1	X	X	X	(1) You added a statement to the EAL Basis regarding mode dependency. Why? (2) The title you gave for CA1 is wrong.
9	CU2	X	X	X	(1) You added the word "possible" to CU2.2a. Why? (2) Any other indications of possible loss, like tanks? Farley had much more for this EAL threshold. (Vogtle only). (3) CU2.1: Your EAL threshold states 194' but the EAL Basis states 129'. Correct this error. (Vogtle only).
10	CU3	X	X	X	Do you have the ability to cross-tie? If so, reflect that in this EAL.
11	CU4	X	X	X	(1) Title is different between Justification Matrix and Redline Strikeout copy. Which one is correct? (2) You deleted the "for greater than 30-min" criteria from the EAL Basis without flagging the change or providing justification. (Farley & Hatch only)
12	CU5	X	X	X	(1) Title is different between Justification Matrix and Redline Strikeout copy. Which one is correct? (2) CU5.1: Need something here, or need to justify its exclusion better. You must come up with an acceptable alternative. (Farley only) (3) CU5.1: Where did 60-minute criteria come from and how were these values obtained? (Vogtle & Hatch only). (4) CU5.2: Is this applicable in these Op Modes?
13	CU6	X	X	X	(1) CU6.1: Justify these communication methods as viable, routine communication methods, particularly the plant radio system and sound-powered phones. (2) CU6.2: Justify these communication methods as viable, routine communication methods. Your "commercial phones" list is too general, provide specific communication methods.
14	CU7	X	X	X	You deleted "required" from CU7.1b without justification. Why is this deleted?
15	CU8			X	Do not see why you need to delete "observed on nuclear instrumentation". Not a valid justification for deletion as consistency with NEI 99-01 should be the goal.

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16	CA1	X	X	X	(1) The justification in the EAL Basis for the calculation of the bottom ID of the RCS loop does not agree with the value you placed in the EAL. Correct this error. (Farley only) (2) You added the word "possible" to CA1.2b. Why?
17	CA2	X	X	X	You added the word "possible" to CA2.2b. Why?
18	CA3	X	X	X	(1) You added a 15-minute qualifier to CA3.1a. Why? (2) Where is the site-specific information called out for in CA3.1b?
19	CA4	X	X	X	(1) You added a note regarding the ED not waiting until 20-min has elapsed before EAL CA4.1. No justification was given, and this is inappropriate. (Farley & Vogtle only) (2) CA4.2.b: You deleted "or RCS inventory reduced" without justification. This should be in the EAL. (Farley & Vogtle only) (3) CA4.3b: Justify the selection of 10 psig. What instrument(s) are used and what are their ranges? (4) You removed reference to "freeze seals or nozzle dams" in the EAL Basis without justification. Why? (5) The note you placed in front of CA4.2 is applicable for CA4.3 also, how is this flagged in your EAL Basis the way you have it worded? (Hatch only) (6) CA4.3b: The Justification Matrix states "RCS pressure", the EAL Basis states "RPV pressure", which one is it? (Hatch only)
20	CS1	X	X	X	(1) You added "affecting core decay heat removal" to CS1.1a and CS1.2a without justification. Why was this added? (2) You added the word "possible" to CS1.1b and CS1.2b. Why? (3) Any other indications of possible loss, like tanks? Farley had much more for this EAL threshold. (Vogtle only).
21	CG1	X	X	X	(1) You added "erratic source range monitor indication" to CG1.1 without justification, why was this addition made? (Farley only) (2) Please provide more detail as to the selection your pressure values. (3) Any other indications of possible loss, like tanks? Farley had much more for this EAL threshold. (Vogtle only). (4) You added "possible" to CG1.1, why? This was not flagged as a difference or justified. (Hatch only)
22	FB Table	X	X	X	Why did you delete Note #2 from the table? This was not flagged or justified, and it is not developer information.

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23	FB-PWR-RCS-L2 & L3	X	X		Not all changes flagged or justified. Provide adequate justification for your proposed changes.
24	FB-PWR-RCS-L4	X			This should be a logic OR, not a logic AND. Correct error or justify position.
25	FB-PWR-CONT-PL1 & 2	X	X		(1) Justification for deleting the containment pressure threshold is inadequate, provide more detail, particularly as it is in your EAL Basis (27 psig). (Farley only) (2) Not all changes flagged or justified and logic is confusing. Provide more detailed explanation for your proposed wording.
26	FB-PWR-CONT-L5	X	X		Not all changes flagged or justified. Provide adequate justification for your proposed changes.
27	FB-PWR-CONT-PL3	X	X		Not all changes flagged or justified and logic is confusing. Provide more detailed explanation for your proposed wording.
28	FB-PWR-CLAD-L1 & PL1 BASIS	X			You added a note without justification that seems to provide exclusion criteria without justification. Provide adequate justification or remove note.
29	FB-PWR-CLAD-L2 BASIS	X	X		(1) Not all changes flagged or justified. Provide more detailed explanation for your proposed wording. (2) 1 st sentence is incomplete.
30	FB-PWR-CLAD-L3 & PL3 BASIS	X	X		(1) Not all changes flagged or justified. Provide more detailed explanation for your proposed wording. (2) You deleted "initiation after SI is blocked", why?
31	FB-PWR-CLAD-L6 BASIS	X	X		Provide more justification for not having anything here.
32	FB-PWR-CLAD L7 BASIS	X	X		You deleted the note related to SG1, why? You did not delete it from FB-PWR-RCS-L6.

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33	FB-PWR-RCS-PL1 BASIS	X			You added a note without justification that seems to provide exclusion criteria without justification. Provide adequate justification or remove note.
34	FB-PWR-RCS-PL2 BASIS		X		You state a 120 GPM value in the basis for PL2 but it is not reflected on the FB Table. Correct this error.
35	FB-PWR-RCS-L4 BASIS		X		You have a logic AND instead of a logic OR as stated in the FB table. Correct the discrepancy and justify the change.
36	FB-PWR-RCS-L5 BASIS	X	X		Provide more justification for not having anything here.
37	FB-PWR-CONT-L4 BASIS	X	X		You deleted reference information of importance to understanding these EALs. This was not justified, is not developer information, and is not appropriate. (2 nd to last paragraph in EAL Basis)
38	FB-PWR-CONT-L7		X		Provide more justification for not having anything here.
39	FB-PWR-CONT-L8 BASIS	X	X		You deleted the note related to SG1, why? You did not delete it from FB-PWR-RCS-L6.
40	FB-BWR-RCS-L3			X	You did not flag this complete rewrite of the threshold as a difference or a deviation. Flag these changes and justify the changes. Note, that even when you justify these changes as required by RIS 2003-18, the logic for RCS Leak Rate should be "High MSL Flow OR High Steam Tunnel Temperature Annunciators" not "High MSL Flow AND High Steam Tunnel Temperature Annunciators".

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41	HU1	X	X	X	<p>(1) HU1.1: Provide more detail as to how this EAL is declared, i.e., how is this validated, where is the equipment, discuss timeliness, etc.</p> <p>(2) HU1.2: You stated a setpoint of 115 mph. How is this measured? What is the range of the instrument? (Farley only)</p> <p>(3) HU1.3: Justification Matrix and Redline Strikeout do not match. Which one is the one you want and why? (Farley only)</p> <p>(4) HU1.6: You deleted part of the EAL without appropriate justification. Why make this change? HA1 has the Diesel Generator Room as an area of concern, why is that not carried over to this EAL? Provide more justification as to why there are no other areas of concern for this event. (Farley only)</p> <p>(5) HU1.6: Deleting this threshold was not justified in the Justification Matrix. (Vogtle only)</p> <p>(6) HU1.7: Provide more justification as to why you did not develop EALs for other situations covered by this EAL as stated in NEI 99-01.</p> <p>(7) HU1.5 Basis: You deleted the note related to actual fires being classified by HU2 and HU3 without justification, why? This is not developer information.</p> <p>(8) HU1.7 Basis: You deleted information required for an understanding of the intent of the EAL without justification, why? This is not developer information.</p>
42	HU2	X	X	X	<p>(1) The EAL wording in the Justification Matrix does not match the Redline Strikeout version. Which wording is the one you want to use? (Farley only)</p> <p>(2) Why did you add "unless disproved by personnel observation" without putting the information that this criteria has to occur within 15-min of the alarm? (Vogtle only)</p>
43	HU3	X			Title in Justification Matrix does not match Redline Strikeout version. Which wording is the one you want to use?
44	HU4	X	X	X	In the EAL Basis you state that the status and size of the plane IS provided by NORAD through the NRC. However, the NEI White Paper states that the status and size of the plane MAY be provided by NORAD through the NRC. Please correct this error or justify the change.

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45	HA1	X	X	X	<p>(1) HA1.1: Provide more detail as to how this EAL is declared, i.e., how is this validated, where is the equipment, discuss timeliness, etc.</p> <p>(2) HA1.2: You stated a setpoint of 115 mph. How is this measured? What is the range of the instrument? You also state "any listed systems", what listed systems? (Farley only)</p> <p>(3) HA1.5: Your justification for deleting this EAL does not account for the potential industrial safety hazards (e.g., electric shock) that preclude actions necessary to operate or monitor safety equipment. Provide more justification or re-instate EAL. (Farley & Vogtle only)</p> <p>(4) HA1.6: What wind speed are you intending this to be declared at? (Farley & Vogtle only) Also, provide more justification as to why you did not develop EALs for other situations covered by this EAL as stated in NEI 99-01.</p>
46	HA2	X	X	X	You state "plant vital area" and then list several areas. Are these the same areas? If so, the wording is confusing. Consider changing to "Fire or explosion in the following plant vital areas {list here} and affected system parameter indications show..."
47	HA4	X	X	X	You stated that your proposed changes were as a result of implementing the NEI White Paper for Security Bulletin 05-02. However, your wording does not match the wording presented in the NEI White Paper or Security Bulletin 05-02, and the differences have not been flagged or justified.
48	HA7	X	X	X	In the EAL Basis you state that the status and size of the plane IS provided by NORAD through the NRC. However, the NEI White Paper states that the status and size of the plane MAY be provided by NORAD through the NRC. Please correct this error or justify the change.
49	HA8	X	X	X	In the EAL Basis you state that the status and size of the plane IS provided by NORAD through the NRC. However, the NEI White Paper states that the status and size of the plane MAY be provided by NORAD through the NRC. Please correct this error or justify the change.
50	HS1	X	X	X	You stated that your proposed changes were as a result of implementing the NEI White Paper for Security Bulletin 05-02. However, your wording does not match the wording presented in the NEI White Paper or Security Bulletin 05-02, and the differences have not been flagged or justified.
51	HS4	X	X	X	In the EAL Basis you state that the status and size of the plane IS provided by NORAD through the NRC. However, the NEI White Paper states that the status and size of the plane MAY be provided by NORAD through the NRC. Please correct this error or justify the change.
52	HG1	X	X	X	How do you plan to address the loss of physical control of spent fuel pool cooling systems if imminent fuel damage is likely (e.g., freshly off-loaded reactor core in pool)?
53	SU1	X	X	X	<p>(1) Where is the site-specific information called out for in SU1.1b?</p> <p>(2) Do you have the ability to cross-tie? If so, reflect that in this EAL.</p>

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54	SU3	X			The EAL threshold is based upon a loss of approximately 75% of the safety system annunciators, not greater than 75%. Correct this error.
55	SU4	X	X		<p>(1) SU4.1: No justification given for deleting this EAL. You must address the intent of this EAL. (Farley only)</p> <p>(2) SU4.1: Justify why you added the 60-minute criteria. (Vogtle only)</p> <p>(3) SU4.2: Provide more explanation for the values chosen for this EAL. (Farley only)</p> <p>(4) SU4.2: Justify why you added the 48-hour criteria. (Vogtle only)</p> <p>(5) EAL Basis references EAL #2 even though you don't have EAL #2 anymore. (Farley only)</p>
56	SU5			X	You deleted reference to mass balances from the EAL Basis. This change was not flagged as a difference or deviation and was not justified. Why was this change made? Statement should stay as proposed by NEI 99-01 unless you can make a convincing argument otherwise.
57	SU6	X	X	X	<p>(1) SU6.1: Justify these communication methods as viable, routine communication methods, particularly the plant radio system and sound-powered phones.</p> <p>(2) SU6.2: Justify these communication methods as viable, routine communication methods. Your "commercial phones" list is too general, provide specific communication methods.</p>
58	SA2	X	X	X	This EAL could be worded better, for example you state "...manual trip was successful as indicated by ...successful manual trip...". Recommend rewording to the wording used by the proposed NEI EAL FAQ.
59	SA4	X		X	<p>(1) The EAL threshold is based upon a loss of approximately 75% of the safety system annunciators, not greater than 75%. Correct this error. (Farley only)</p> <p>(2) You deleted referenced examples of other EALs (area, process, and/or effluent rad monitors). This change was not flagged as a difference or deviation and was not justified. Why was this change made? Statement should stay as proposed by NEI 99-01 unless you can make a convincing argument otherwise.</p>
60	SA5	X	X	X	<p>(1) You did not flag or justify the deletion of "reduced to a single power source". Why was this change made? (Farley & Vogtle only)</p> <p>(2) Do you have the ability to cross-tie? If so, reflect that in this EAL.</p> <p>(3) You deleted guidance related to another related condition applicable to this EAL. This change was not flagged as a difference or deviation and was not justified. Why was this change made? Statement should stay as proposed by NEI 99-01 unless you can make a convincing argument otherwise.</p>
61	SS1	X	X	X	Where is the site-specific information called out for in SS1.1b?
62	SS2	X	X	X	This EAL could be worded better, for example you state "...manual trip was successful as indicated by ...successful manual trip...". Recommend rewording to the wording used by the proposed NEI EAL FAQ.

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63	SS3			X	Explain in more detail the rationale for deleting the 15-min criteria. Why was this change made? Statement should stay as proposed by NEI 99-01 unless you can make a convincing argument otherwise.
64	SS4	X	X		(1) You added a note without justification that seems to provide exclusion criteria without justification. Provide adequate justification or remove note. (Farley only)
65	SS6	X	X	X	<p>(1) SS6.1a: The EAL threshold is based upon a loss of approximately 75% of the safety system annunciators, not greater than 75%. Correct this error. Also, you added "or indicators" without justification, why was this added? (Farley only)</p> <p>(2) The logic could be perceived wrong for this EAL the way you have it worded. The way you have it worded you would declare a site area emergency if you lose the ability to monitor a significant transient in progress regardless whether or not a significant transient was occurring. Either go back to NEI 99-01 wording, or state "Significant transient in progress AND 1. {loss of annunciation threshold} AND 2. {loss of compensatory non-alarming indications threshold} and 3. {loss of critical safety function monitoring threshold}".</p>
66	SG2	X	X		<p>(1) You added a note without justification that seems to provide exclusion criteria without justification. Provide adequate justification or remove note.</p> <p>(2) This EAL could be worded better. Recommend rewording to the wording used by the proposed NEI EAL FAQ.</p>