

From: Ed Miller
To: michael_okeefe@fpl.com
Date: 08/22/2006 4:14:51 PM
Subject: Clarification of RAI response

Mike,

The following is a draft clarifying question I received from the reviewer. If needed, I can set up a conference call to discuss this further. This is not an official RAI and does not represent an NRC staff position.

In the response to the fourth request for additional information in their August 16, 2006 letter, FPLE indicated that the primary-to-secondary leak rate assumed in the dose consequence analyses conservatively bounds the expected actual leakage that is inclusive of operational leakage existing prior to the accident plus any increased leakage resulting accident induced changes in primary-to-secondary pressure differential. This wording (as proposed) goes beyond TSTF-449 and is not consistent with operating experience (in which the leakage from a tube can go from a relatively small amount (a few gallons per day) to several hundreds of gallons per minute during normal operation). As a result, please discuss your plans to remove this statement and make your submittal consistent with TSTF-449. The staff notes that the text on page 2 of Insert B3/4.4.5 and page 2 of Insert Bases 3.4.6.2 will need to be changed.

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