

NRR-PMDAPEm Resource

From: Paige, Jason
Sent: Tuesday, September 13, 2011 11:55 AM
To: Tomonto, Bob
Cc: Mihalakea, Stavroula; Everett, Ronald
Subject: ACCEPTANCE REVIEW: Turkey Point Accident Monitoring Instrumentation TS Changes LAR (ME6891 and ME6892)

Bob,

While completing the acceptance review, the EICB reviewer has determined that the subject LAR is unacceptable with the opportunity to supplement. Below is the question the reviewer has generated. On September 12, 2011, it was determined that a call is not needed to discuss the draft RAI sent to you via email. If you have any questions, feel free to contact me.

EICB-1 In a letter dated January 26, 1984, the licensee provided an evaluation of the Turkey Point's existing accident monitoring instrumentation and control systems against the provisions of Regulatory Guide 1.97, Revision 3. [Reference: Letter from J.W. Williams (Florida Power and Light Company) to Darrell G. Eisenhut, "Turkey Point Units 3 and 4, Docket Nos. 50-250 and 50-251, Supplement 1 to NUREG 0737 – Regulatory Guide 1.97 (Rev. 3), L-84-20, January 26, 1984.] In the parameter listing summary sheets provided with the letter, the High Range Noble Gas Effluent Monitors for the Main Steam Lines (i.e., RAD-6426) was identified as a Type C, Category 2 variable. According to RG 1.97, Rev.3, Type C variables are "those variables that provide information to indicate the potential for being breached or the actual breach of the barriers to fission product release, i.e., fuel cladding, primary coolant pressure boundary, and containment". In the August 17, 2011, license amendment request, the licensee indicates that the RAD-6426 instrument that performs the function of being a High Range Noble Gas Effluent Monitor for the Main Steam Lines is a Type E, Category 2 variable that does not perform a function that would meet any of the 10 CFR 50.36(c)(2)(ii) criterion for being a limiting condition or operation.

Provide the documentation that changed the High Range Noble Gas Effluent Monitor on the Main Steam Lines function from a Type C to a Type E variable. If the variable is, in fact, a Type C variable, it would appear that an LCO may be appropriate for this instrument per 10 CFR 50.36(c)(2)(ii)(A).

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