

PMTurkeyCOLPEm Resource

From: Comar, Manny
Sent: Wednesday, January 25, 2012 9:37 AM
To: orthen, Richard; Raymond Burski; Steve Franzone; STEVEN.HAMRICK; TurkeyCOL Resource; William Maher
Cc: Habib, Donald; Comar, Manny
Subject: Draft RAI 6290 related to SRP Section 14.03 - Inspection, Tests, Analyses and Acceptance Criteria for the Turkey Point Units 6 and 7 combined license application.
Attachments: draft RAI 6290_TPN.doc

To All,

Attached is the draft of RAI No:6290, regarding section 14.03 Inspection, Tests, Analyses and Acceptance Criteria for the Turkey Point Units 6 and 7 combined license application.

If you need a conference call to discuss the question(s) of the draft RAIs please contact me at 301-415-3863. Unless you request additional clarification we will normally issue the RAI as final within 3 to 5 days, from today.

Thanks

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Request for Additional Information No. 6290

Turkey Point Units 6 and 7
Florida P and L
Docket No. 52-040 and 52-041

SRP Section: 14.03 - Inspections, Tests, Analyses, and Acceptance Criteria
Application Section: Part 10: License Condition and ITAAC

QUESTIONS from Licensing and Inspection Branch (NSIR/DPR/LIB) (EP)

14.03-***

RAI 14.03.10-1.i (Supplement 1)

In RAI 14.03.10-i (August 1, 2011, Letter No. 033), the NRC requested clarification regarding (1) the 90-minute staff augmentation time in COLA Part 5 Table B-1b, and (2) the inclusion of "within 90 minutes" in three facility activation exercise ITAAC (i.e., Acceptance Criteria 8.1.1.C.1.a, 8.1.1.D.1, and 8.1.1.D.1.a) in COLA Part 10 Table 3.8-1; including whether the two are related. In its August 29, 2011, response to RAI 14.03.10-1.i, the applicant stated that the two areas are related, and that the response to this question will be provided in response to NRC RAI 13.03-5 (e-RAI 5681). In its September 30, 2011, response to RAI 13.03-5, the applicant addressed (in RAI B-6, B-7, B-8, B-9, B-11, and B-12) the 90-minute response (staff augmentation) time, stating in part that the 60-minute response time (consistent with NUREG-0654) will replace the 90-minute response time (in Table B-1b). The staff verified this change in COLA Revision 3, Table B-1b.

The applicant did not, however, address the three exercise ITAAC (identified above) in its response to RAI 13.03-5, in regard to how they relate to the changed staff augmentation time in Table B-1b from 90 minutes to 60 minutes. In COLA Revision 3, the three exercise ITAAC in Part 10 remained at 90 minutes.

Please revise ITAAC acceptance criteria 8.1.1.C.1.a, 8.1.1.D.1, and 8.1.1.D.1.a to change "90 minutes" to "60 minutes," or explain why this change is not required. If applicable, compare the ITAAC facility activation times with the existing emergency plan facility activation times in support of Units 3 and 4. The following provides suggested revisions, which include additional slight wording changes (see also, the comparable ITAAC acceptance criteria from the Vogtle COLA):

8.1.1.C.1.a: ". . . and by the TSC within 60 minutes of TSC activation."

8.1.1.D.1: ". . . and full functional operation of the TSC and EOF within 60 minutes of activation."

8.1.1.D.1.a: ". . . within 60 minutes of the initial classification of an Alert or higher."

14.03-***

RAI 14.03.10-1.f (Supplement 1)

In RAI 14.03.10-1.f (August 1, 2011, Letter No. 033), the NRC requested that the applicant submit an appropriate exemption request that addresses a Tier 1 departure from AP1000 DCD Tier 1 Table 3.1-1, to the extent that COLA Part 10 Table 3.8-1 ITAAC represent a replacement of the comparable Table 3.1-1 ITAAC. In its August 29, 2011, response to RAI 14.03.10-1.f, the applicant stated in part that a Tier 1 departure and exemption request is not appropriate because the emergency planning ITAAC provided in COLA Part 10 Table 3.8-1 are not a replacement, but rather a supplement to the ITAAC in DCD Tier 1 Table 3.1-1. In COLA Part 7 (Departures and Exemption Requests), Revision 3, the applicant did not include an exemption request in Section B (Turkey Point 6 & 7 Exemption Requests) to address DCD Table 3.1-1. Please address the following questions:

a. In COLA Part 7, Section A.1 (Departures That Can Be Implemented Without Prior NRC Approval), correct the Description entry for Departure Number PTN DEP 18.8-2 to read "Technical support center location," rather than "Operations support center location."

b. Provide an appropriate Tier 1 departure and exemption request that removes the ITAAC in DCD Tier 1 Table 3.1-1 from the application. The Table 3.1-1 ITAAC are directly related to the Technical Support Center's (TSC's) location in the AP1000 Annex Building (i.e., the control support area). In COLA Part 7 Departure Number 18.8-2, the applicant moved the TSC from the control support area to the Turkey Point Nuclear Training Building, located outside of the Protected Areas between the control room for Units 3 & 4 and the control rooms for Units 6 & 7. The removal (departure) of the TSC from the control support area necessitates the removal (departure) of the TSC-related ITAAC in Table 3.1-1. While the requested Tier 1 departure and exemption request for DCD Table 3.1-1 represents a change in the staff's approach from what was accepted for the Vogtle and Summer combined license applications (COLAs) - which had comparable DCD TSC relocations (i.e., departures), without a Tier 1 departure and exemption request for DCD Table 3.1-1 - the change is needed for Turkey Point Units 6 & 7, in order to more accurately comply with the structure and intent of the 10 CFR Part 52 licensing paradigm. Whenever an applicant (for a COL that references a certified design) takes a departure from a facility description in the DCD, the applicant must also depart from the ITAAC for that portion of the facility design.