WBN2Public Resource

From: Poole, Justin
Sent: Tuesday, January 24, 2012 8:14 AM
To: Arent, Gordon
Cc: Bryan, Robert H Jr; WBN2HearingFile Resource
Subject: Draft Questions on Technical Specifications
Attachments: Watts Bar 2 Technical Specifications RAI.docx

Gordon,

In reviewing TVA's proposed TS for WBN 2, the staff has come up with the attached questions. Please review to ensure that the RAI questions are understandable, the regulatory basis is clear, there is no proprietary information contained in the RAI, and to determine if the information was previously docketed. If further clarification is needed, and you would like to discuss the questions in a conference call, let us know. Please also let me know how much time Tennessee Valley Authority (TVA) needs to respond to the RAI questions. This email does not convey a formal NRC staff position, and it does not formally request for additional information.

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In reviewing the following sections of the proposed Watts Bar Unit 2 Technical Specifications (Development Revision F), the staff has determined that additional information is needed to complete its review.

1.1, Definitions - LEAKAGE
3.4.13, RCS [Reactor Coolant System] Operational LEAKAGE
3.4.17, Steam Generator (SG) Tube Integrity
5.7.2.12, Steam Generator (SG) Program
5.9.9, Steam Generator Tube Inspection Report

Please provide a response to the following questions/comments:

1. Section 5.7.2.12.d.1 indicates that 100% of the tubing will be inspected in the first refueling outage. Since Watts Bar Unit 2 may replace steam generators (i.e., have a first refueling outage without replacing steam generators and may have a first refueling outage following steam generator replacement), please discuss your plans to modify this requirement to ensure both conditions are addressed (e.g., "…during the first refueling outage following steam generator installation.").

2. Since your proposed technical specifications were prepared, the NRC staff has approved Technical Specification Task Force Traveler 510 (TSTF-510), Revision 2, "Revision to Steam Generator Program Inspection Frequencies and Tube Sample Selection" (ML110610350). The staff's review is summarized in a Notice of Availability dated October 19, 2011 (ML112101604). Since this TSTF Traveler addresses implementation issues associated with the inspections periods and addresses other administrative changes and clarifications which improve the technical specifications, please discuss your plans to incorporate the TSTF-510, Revision 2, changes into your proposed technical specifications.

3. On page B 3.4-73, the applicable safety analyses for operational leakage is provided. In this discussion, you indicate that the pre-accident primary-to-secondary leakage for a main steam line break is 1 gallon per minute from one steam generator. The standard technical specification wording indicates that the leakage may increase to this value during the accident. Please confirm that your accident analysis assumes that the leakage prior to a main steam line break is 1 gallon per minute (in which case the actual rate of leakage during the accident would be greater than 1 gallon per minute due to the higher differential pressure during the accident).

4. On page B 3.4-73, the applicable safety analyses for operational leakage is provided. There are two paragraphs from the standard technical specifications that are not included in this section for Watts Bar Unit 2. These paragraphs address other accidents that involve secondary steam release to the atmosphere and the assumptions for a steam generator tube rupture accident. Please discuss why these paragraphs were not included in your Bases.

5. On page B 3.4-97, the applicable safety analyses for steam generator tube integrity is provided. Please clarify the following sentence: "In these analyses, the steam discharge to the atmosphere is based on the total primary to secondary LEAKAGE from 150 gallons per day (gpd) per steam generator and 1 gallon per minute (gpm) in the faulted steam generator." In addition, the standard technical specifications make it clear that the leakage may increase as a result of accident induced conditions to a specific value. This thought is not captured in your proposal. Please clarify why this was not included in your Bases.