

Enclosure 2
Industry Handouts
of the May 2, 2012
ROP Public Meeting



Reactor Oversight Process Task Force FAQ Log

For May 1, 2012 ROPTF Meeting

FAQ No.	PI	Topic	Status	Plant/Co.	Point of Contact
12-01	MS06	Columbia DG3 Failure	Introduced 3/28/2012 NRC comments received 4/25/2012 Licensee seeks to withdraw the FAQ 5/02/2012	Generic	Richard Wolfgramm (ENW) Jeremy Groom (NRC)
12-02	PP01	Counting of Compensatory Hours for Perimeter Intrusion Detection System	Introduced 3/28/2012 NRC response received 4/24/2012 To be discussed 5/2/2012	Generic	Ron Gaston (Exelon) Brian Yip (NRC)
12-03	IE04	St. Lucie USwC	To be introduced 5/2/2012	St. Lucie	Eric Katzman (FPL) Tim Hoeg (NRC)

NEI Contact: James E. Slider, 202-739-8015, jes@nei.org



A. J. DeGrasse
Westinghouse Resident Manager
FPL South Plants

4/27/12

Review of PSL EOP Procedures

Background - When the Emergency Procedure Guidelines were developed, the important consideration was that they lead the operators to take the appropriate actions. The notion that the plant would somehow be penalized for transitioning from one EOP to another or within the same EOP was never envisioned. So, the criteria selected to prompt such transitions were based on ensuring that the transition took place; they were not based on making sure the transition would be made only if necessary. The EPG structure requires that the operators continue to reconfirm that the procedure in use is being successful, and if not, they will transition to the appropriate procedure.

The EOP acceptance band on Tav_g (525 – 535 °F) is the St Lucie implementation of the band described in CEN-152 as [expected post-trip band]. For the subject event, where the trip occurred with essentially no decay heat, the 'expected post-trip' Tav_g would certainly be less than the 525 °F 'expected' following a reactor trip from full power with a normal decay heat level in the core. The plant EOPs cannot use criteria like "expected temperature", but must use numerical values, so that the operators are not asked to make judgments on the fly.

In review of the St Lucie EOPs, they appear to be in concert with the Generic Guidelines. However, it is not clear why the guideline step allows for 'or restoring' but the SFSC requires 'between' 525 to 535 °F. Other SFSC parameters are written to allow a wider band as long as the parameter is 'trending' to the normal control band. The fact that the station operator successfully from EOP-01 to EOP-02 defines this trip as "Un Complicated" (Reference CEN 152 Rev 5.4 Diagnostic Actions)

FPL has the option to work with the WOG to address any inconsistency with the GENERIC guidelines (CEN-152 Revision 5.4), and follow the process for possible generation of Change Notice to be implemented into EOP Procedures, as necessary.

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