

From: Sebrosky, Joseph
Sent: Wednesday, June 27, 2012 9:32 AM
To: 'Soenen, Philippe R'
Cc: Lent, Susan; Burkhardt, Janet; 'Baldwin, Thomas (DCPP)'; Mazumdar, Subinoy; Carte, Norbert
Subject: RE: Request for Additional information for DCPD regarding TS 3.3.5 (ME7520 and ME 7521)

Philippe,

By letter dated October 24, 2011, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML113010196), Pacific Gas and Electric Company (PG&E) submitted PG&E Letter DCL-11-072, "License Amendment Request 11-06 Revision to Technical Specification 3.3.5, 'Loss of Power (LOP) Diesel Generator (DG) Start Instrumentation'."

PG&E submitted a request for revision to Facility Operating License Nos. DPR-80 and DPR-82, revising Technical Specification (TS) 3.3.5 and final safety analysis report update (FSARU) Appendix 6.2D and Sections 6.3, 15.3, and 15.4, revise the loss-of-coolant accident (LOCA) control room operator and offsite dose analysis of record described in the FSARU, and provide a new process for revising input values to this analysis.

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed the information provided in your application and determined that the following additional information is required in order to complete its review. This request for additional information (RAI) was discussed with you on June 20, 2012. A schedule for the response has not yet been provided by you. When a schedule has been determined, please inform me so that the reviewers can be informed.

Should the NRC determine that this RAI is no longer necessary prior to the scheduled date, the request will be withdrawn. If circumstances result in the need to revise the requested response date, please contact me at (301) 415-1132 or via e-mail at joseph.sebrosky@nrc.gov. The NRC staff has determined that no security-related or proprietary information is contained herein.

Request for Additional Information

1. In Response 5.1 provided in an April 12, 2012, letter (ADAMS Accession No. ML12104A022) the licensee stated that for ABB 27N relay a calibration accuracy of ± 0.5 Vac is used while the vendor specified repeatability for ABB 27N at T1A (96.5 Vac) is 0.1 percent. The licensee further stated that the selected calibration accuracy is more than 5 times the vendor specified repeatability (or $5 \times 1.96\sigma = 9.8\sigma$) and will afford a confidence level much higher than 95 percent in achieving the specified setpoint every time.

The licensee's setpoint calculation 357S-DC in Attachment 6 to the LAR dated October 24, 2011 (ML11301096), indicates in Section 7.3.3 that for this relay the licensee has used M&TE for selection of ± 0.5 Vac as calibration accuracy and not vendor specified repeatability. Section 7.3.3 refers to Section 7.4.3 of the calculation. Section 7.4.3 refers to Section 4.8 which refers to Reference 12.1.6 which is not included in the submittal. Provide the information necessary to justify how the 95/95 confidence level for the calibration accuracy is established.

2. In Response 5.2 provided in an April 12, 2012, letter (ADAMS Accession No. ML12104A022) for ABB 27N Time Delay function the licensee stated that the selected

calibration tolerances are more than vendor reference accuracies and therefore will exceed 95 percent confidence level. Provide appropriate justification for this conclusion.

In Response 5.3 provided in an April 12, 2012, letter (ADAMS Accession No. ML12104A022) the licensee has addressed selection of ABB 59N relay calibration accuracy. Related Section 7.3.9 for this relay in calculation 357S-DC indicates that the calibration accuracy is based on M&TE. Our findings on this relay are similar to our findings for Response 5.1. Provide the information necessary to justify how the 95/95 confidence level for the calibration accuracy for this relay is established.

In Response 5.4 provided in an April 12, 2012, letter (ADAMS Accession No. ML12104A022) the licensee stated that the vendor reference accuracy has been used as calibration accuracy without justifying how it meets the 95/95 confidence level. Provide the information necessary to justify how the 95/95 confidence level for the calibration accuracy is established.

3. In Response 5.5 provided in an April 12, 2012, letter (ADAMS Accession No. ML12104A022) the licensee addressed ABB 62T timer. The related Sections 7.3.15 and 7.3.16 in calculation 357S-DC indicates that M&TE has been used for rack calibration accuracy and our findings are same as in response 5.1.
4. The LAR indicates that Basler relays are microprocessor based relays. Provided detail information how these relays have been qualified for Class 1E application