Enclosure 3

Reactor Oversight Process Task Force FAQ Log – April 2, 2014

FAQ Log for ROP Public Meeting April 2, 2014

FAQ No.	PI	Topic	Status	Plant/Co.	Point of Contact
13-04	EP03	Point Beach ANS	INTRODUCED 09/11/2013 Discussed 10/23/2013, 11/20/2013, 01/15/2014. Approved final on 04/02/2014	Point Beach NextEra	Gerard Strharsky (NextEra) James Beavers (NRC)
13-05	IE03	Oyster Creek Downpower	INTRODUCED 09/11/2013 Discussed on 10/23/2013, 11/20/2013, 01/15/2014. Proposed NRC response received 03/31/2014. Approved final on 04/02/2014	Oyster Creek Exelon	Dennis Moore (Exelon) Jeffrey Kulp (NRC)

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

Final NRC Response
FAQ 13-04
Point Beach Alert & Notification System

Plant: Point Beach 1 and Point Beach 2
Date of Event: May 15, 2013
Submittal Date: August 14, 2013
Licensee Contact: Gerard D. Strharsky **Tel/email:** 920-755-6557
NRC Contact: James Beavers **Tel/email:** 630-829-9760

Performance Indicator: Alert and Notification System Reliability (EP03)

Site-Specific FAQ (Appendix D)? Yes, Appendix D page D-1

Kewaunee and Point Beach

Issue: The Kewaunee and Point Beach sites have overlapping Emergency Planning Zones (EPZ). We report siren data to the Federal Emergency Management Agency (FEMA) grouped by criterion other than entire EPZs (such as along county lines). May we report siren data for the PIs in the same fashion to eliminate confusion and prevent 'double reporting' of sirens that exist in both EPZs? Kewaunee and Point Beach share a portion of EPZs and responsibility for the sirens has been divided along the county line that runs between the two sites. FEMA has accepted this, and so far the NRC has accepted this informally.

Resolution: The purpose of the Alert and Notification System Reliability PI is to indicate the licensee’s ability to maintain risk-significant EP equipment. In this unique case, each neighboring plant maintains sirens in a different county. Although the EPZ is shared, the plants do not share the same site. In this case, it is appropriate for the licensees to report the sirens they are responsible for. The NRC Web site display of information for each site will contain a footnote recognizing this shared EPZ responsibility.

FAQ requested to become effective when approved.

Question Section:

NEI 99-02 Guidance needing interpretation (include page and line citation):
Page D-1 Lines 45 and 46. “In this case, it is appropriate for the licensees to report the sirens they are responsible for.”

Event or circumstances requiring guidance interpretation:
Point Beach Nuclear Plant (PBNP) personnel have been notified that as a result of the Kewaunee Power Station (KPS) decommissioning actions, KPS will no longer be monitored under the NRC Reactor Oversight Process (ROP). On May 15, 2013 the NRC docketed KPS’s certification of permanent defueling. Pursuant to10 CFR 50.82(a)(1)(ii), the 10 CFR Part 50 license for KPS no longer authorizes operation of the reactor or emplacement or retention of fuel into the reactor vessel, as specified in 10 CFR 50.82(a)(2). All data collection for CDE and INPO shall be counted from the beginning of May until May 15, 2013 @ 1358.

This situation results in a condition where neither KPS nor PBNP are reporting NEI 99-02 ANS PI data for the eight overlapping sirens located in Kewaunee County. The sirens are still the responsibility of and are being maintained by KPS as required by 10CFR50.47 and 10CFR 50 Appendix E. Because KPS retains

responsibility for the sirens, PBNP is not reporting PI data as outlined in current NEI 99-02 guidance. This condition will exist until PBNP installs new or assumes responsibility for the existing overlapping sirens. PBNP understands that it is the licensee's responsibility to ensure ANS sirens remain available and are not impacted by the KPS decommissioning process. PBNP also understands that KPS will be submitting an exemption that would no longer require a Public Alert and Notification System (ANS siren equipment) when they transition to a fully decommissioned, this is expected to occur one year to seventeen months from the May 15, 2013 permanent defueled date.

PBNP has historically, and will continue to, obtain ANS siren performance and maintenance records and data from KPS for the purpose of monitoring and recording all required information related to overlapping siren performance.

If licensee and NRC resident/region do not agree on the facts and circumstances explain
The content of this FAQ has been reviewed with NRC Region III Emergency Preparedness Inspector Mr. James Beavers. Mr. Beavers indicated that he concurs with the facts and circumstances as provided.

Potentially relevant existing FAQ numbers
None

Response Section

Proposed Resolution of FAQ
Until such time as KPS is no longer responsible for the 8 ANS sirens that are co-located in Kewaunee County and are within the PBNP EPZ, PBNP will document siren performance for these 8 sirens in the comments section of the Point Beach Unit 1 and Unit 2 Emergency Preparedness performance indicator (Total sirens-tests), in the INPO Consolidated Data Entry data base. When PBNP becomes responsible for the maintenance and testing of sirens located in Kewaunee County, revise NEI 99-02 Rev. 6 Appendix D to remove the "Kewaunee and Point Beach" plant specific design issue from the document. PBNP will subsequently commence reporting of siren performance for all sirens within the PBNP EPZ as required by the ROP and NEI 99-02.

If appropriate, provide proposed rewording of guidance for inclusion in next revision.
No wording change is required.

NRC Final Response

The staff agrees with the Proposed Resolution and an effective date of April 2, 2014.

NRC Final Response
FAQ 13-05
Oyster Creek Downpower

Plant: Oyster Creek Nuclear Generating Station

Date of Event: 09/28/2012

Submittal Date:

Licensee Contact: Dennis M Moore **Tel/Email:** 609-971-4281 dennis.moore@exeloncorp.com

NRC Contact: Jeffrey Kulp **Tel/Email:** 609-971-4978

Performance Indicator: UNPLANNED POWER CHANGES PER 7,000 CRITICAL HOURS (IE03)

Site-Specific FAQ (Appendix D)? No

FAQ requested to become effective: **when approved**.

Question Section

NEI 99-02 Guidance needing interpretation (include page and line citation):

Page 13

Unplanned changes in reactor power are changes in reactor power that are initiated less than 72 hours following the discovery of an off-normal condition, and that result in, or require a change in power level of greater than 20% of full power to resolve. Unplanned changes in reactor power also include uncontrolled excursions of greater than 20% of full power that occur in response to changes in reactor or plant conditions and are not an expected part of a planned evolution or test.

Page 14

Equipment problems encountered during a planned power reduction greater than 20% that alone may have required a power reduction of 20% or more to repair are not counted as part of this indicator if they are repaired during the planned power reduction. However, if during the implementation of a planned power reduction, power is reduced by more than 20% of full power beyond the planned reduction, then an unplanned power change has occurred.

Event or circumstances requiring guidance interpretation:

On September 28, 2012 at 1802- Oyster Creek Nuclear Generating Station (OCNGS) experienced an increase in leakage from a previously identified (<72 hours) salt water leak into the condenser bay from a hole in circulating water piping. The timeline of power changes and event details are as follows:

1855 - Control Room Operators commenced lowering power to allow isolating and draining of the 1A North Condenser waterbox to mitigate the leakage of water into the condenser bay.

1914 – GenManager Ticket Number 1022326 was created to track the emergent downpower to 85%. The ticket begin time was 1901 with an end time of 2259 (the ticket was created, as such, with the intention of merging the repair with the upcoming planned downpower to 73%).

1927 - The power reduction was complete with Reactor Power at 85%.

1943 – The 1A North Condenser waterbox was isolated reducing the leakage to approximately half of the initial leakage.

2110 - Operations commenced draining 1A North waterbox

2147 – Operations completed a pre-job brief for lowering reactor power to 73% for “End of Cycle Rod Maneuvers”

2305 – Control Room Operators commenced lowering power from 85% to 73% for "End of Cycle Control Rod conditioning maneuver" (This is the beginning of a planned, >72 hours in advance, downpower to lower power to 73% from 9/28, 2300 until 9/29, 0700)

9/29, 0015 – Control Room Operators completed lowering power to 73%.

9/29, 0033 – Control Room Operators commenced raising power for "End of Cycle Control Rod conditioning"

9/29, 0041 – The initial repair to the 1A North Condenser waterbox piping was complete reducing the leakage from the waterbox to approximately 1 gpm.

9/29, 0116 – A decision was made to hold the power ascension (with power at 80%) to further assess the salt water leak prior to returning to 100% power

09/29, 0217 – Operations completed a pre-job brief for lowering power to 70% to aid in completing additional circulating water piping repair to reduce or eliminate leakage. (70% was chosen to provide more repair options)

09/29, 0302 – Control Room Operators commenced lowering power from 80% to 70% to "Repair leak Circ Water Leak"

09/29, 0335 – Control Room Operators completed lowering power to 70%

09/29, 0335 to 09/29, 1539 – OCNGS took action, as required, to aid in repairing the circulating water leak.

09/29, 1539 – Circulating water repairs are complete and Control Room Operators commenced raising reactor power from 70% to 100%

09/29, 1843 – Reactor power was returned to 100%

As noted above, Oyster Creek lowered power emergently (<72 hours) due to a salt water leak- with an initial power reduction to 85% (<20% reduction). Power was then lowered to 73% at 0015 in accordance with a planned (>72 hours) power maneuver. After completion of the planned power maneuver, during power ascension (at approximately 80%) a decision was made to lower power to 70% power to facilitate additional repairs to the circulating water system to attempt to eliminate leakage. 70% power was chosen to allow securing of a circulating water pump to increase repair options. (It is important to note that the repair could have been made at a power level above 70%.)

If licensee and NRC resident/region do not agree on the facts and circumstances explain:

NRC Resident Comments

The description of the event and subsequent plant response is accurate as presented.

The NRC resident inspection staff does not agree that the guidance provided in NEI 99-02 excludes the duration of a downpower from consideration when determining whether a downpower should count against this performance indicator. NEI 99-02 revision 6, page 14, lines 10-14 state:

"Equipment problems encountered during a planned power reduction greater than 20% that alone may have required a power reduction of 20% or more to repair are not counted as part of this indicator if they are repaired during the planned power reduction. However, if during the implementation of a planned power reduction, power is reduced by more than 20% of full power beyond the planned reduction, then an unplanned power change has occurred."

NRC Final Response
FAQ 13-05
Oyster Creek Downpower

The NRC resident inspection staff determined that this downpower should count for the following reasons:

- The initial downpower was due to address an off-normal condition (the leak on the circulating water piping) and occurred approximately 4 hours before scheduled power reduction for control rod conditioning.
- The licensee reduced power by a total of 30% to perform the repair and resolve the equipment problem.
- The equipment problem was not repaired during the planned power reduction.

Licensee Position

An emergent downpower to 85% was initiated to address circulating water piping leak. The emergent downpower was scheduled to coincide with a planned downpower to 73% for End of Cycle Rod Maneuvers (rod pattern adjustments). Repairs commenced during the emergent downpower and continued into the planned power reduction significantly reducing the leakage (to approximately 1 gpm). The emergent downpower was < 20 and therefore outside the scope of the performance indicator.

During power ascension from the planned power reduction for rod pattern adjustments, a decision was made to halt the power ascension at 80%, reduce power to 70%, and perform additional repairs to further reduce or eliminate leakage from the circulating water piping repair prior to returning to 100% power.

- The power reduction to 70% was outside of the preplanned evolution which ended at 0033 on 9/29/12
- The power reduction to 70% was < 20% below the previous power level of 80%
- A power reduction to 70% was not required for the additional repairs
- Power level had not been restored to 100% following completion of the planned power reduction.

Potentially relevant existing FAQ numbers: None

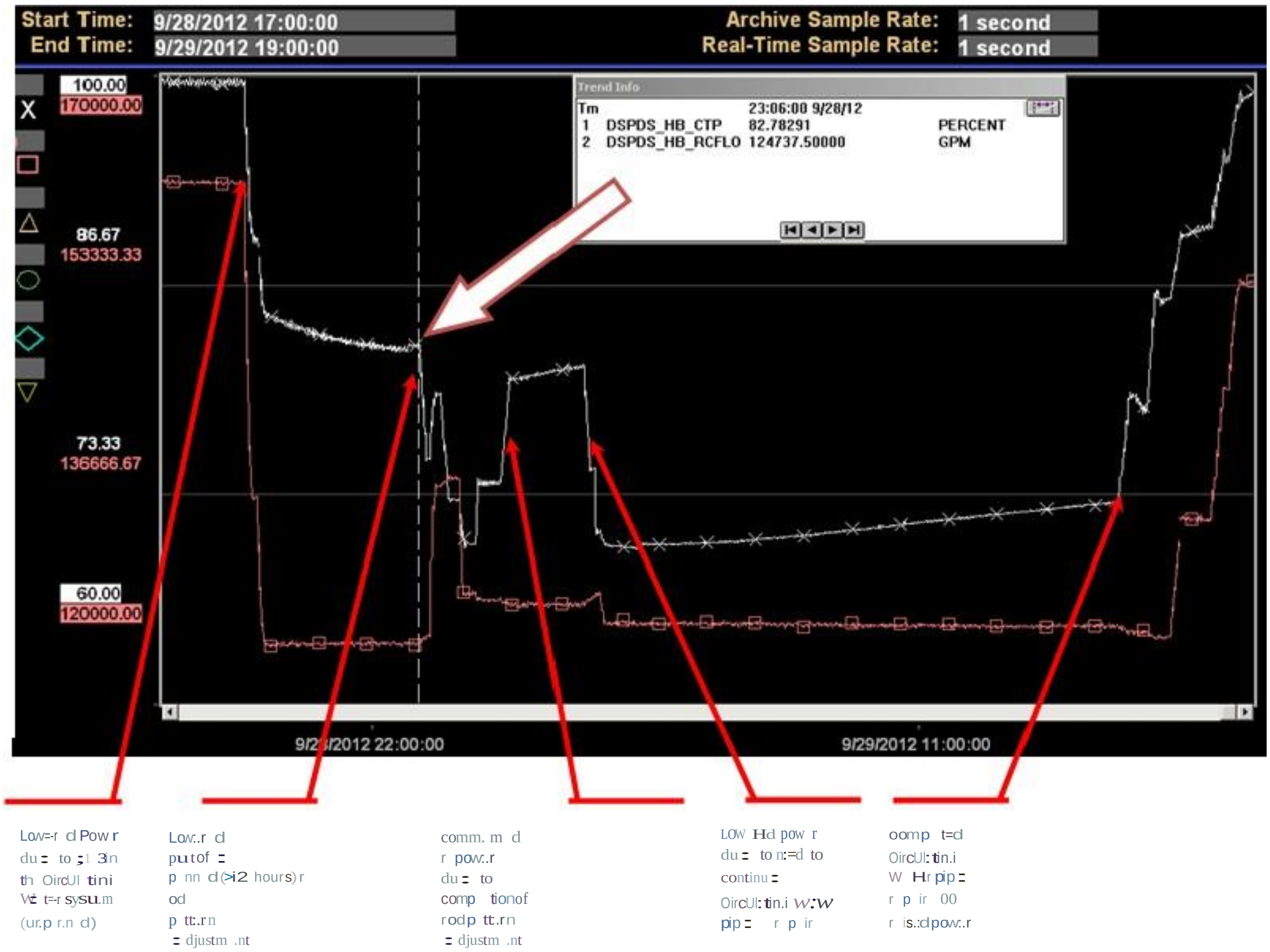
Response Section

Proposed Resolution of FAQ

The emergent and preplanned power reduction should be evaluated as two power reductions as opposed to one continuous power reduction to 73%. The power reduction from 80 to 70 should not be counted as an unplanned power reduction since it was not >20% from the preplanned or the previous power level.

If appropriate, provide proposed rewording of guidance for inclusion in next revision.

Attachment 1- Reactor Power vs Time



NRC Response

The licensee is requesting interpretation of NEI 99-02 guidance as applied to their particular donwpower event. The current guidance in NEI 99-02, Rev. 7 was incorporated by FAQ 469 (Sept. 2009) that changed the definition of unplanned power changes to the following:

NEI 99-02 Rev.7, Page 13

Unplanned change~~s~~ in reactor power, *for the purposes of this indicator,* ~~are~~ is a change~~s~~ in reactor power that (1) ~~are~~ was initiated less than 72 hours following the discovery of an off-normal condition that required or resulted in a power change~~, and that result in, or require a change in power level~~ of greater than 20% of full power to resolve, and (2) has not been excluded from counting per the guidance below. Unplanned changes in reactor power also include uncontrolled excursions of greater than 20% of full power that occur in response to changes in reactor or plant conditions and are not an expected part of a planned evolution or test.

The licensee concludes that the event should be excluded from counting as an Unplanned Power Change per 7,000 Critical Hours per the following guidance:

NEI 99-02, Rev. 7, Page 15

Equipment problems encountered during a planned power reduction greater than 20% that alone may have required a power reduction of 20% or more to repair are not counted as part of this indicator if they are repaired during the planned power reduction.

The NRC staff concludes that this event meets the first part of the definition of unplanned changes in reactor power since the down power was initiated less than 72 hours following the discovery of a circulating water leak and resulted in a total power reduction of 30% (100% to 70%) of full power to fully resolve.

The staff also concludes that the exclusion (NEI 99-02, Rev. 7, page 15, lines 15-17) does not apply to this event because the equipment problem (circulating water piping leak) occurred prior to the scheduled activity and based on the specific circumstances of the event the equipment problem appeared to drive operators to lower power earlier than originally planned. The staff's conclusion is that this event meets the guidance in NEI 99-02, Rev. 7, as an Unplanned Power Change per 7,000 Critical Hours performance indicator occurrence.

The staff believes that the exclusion as written doesn't have sufficient detail on when an equipment problem should be counted toward the PI. The guidance (NEI 99-02, Rev. 7, page 15, lines 15-17) is difficult to apply because the intent is ambiguous (i.e., why is credit being granted when otherwise the occurrence by itself would count against the PI). The staff recommends modifying the guidance to provide a clear understanding of the basis for applying the guidance.

This FAQ is effective immediately after approval.