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To: na3raidommailbox@dom.com
Cc: PMNorthAnna3COLPEmails Resource; Klos, John; Scully, Derek
Subject: Editorial Comments for Technical specification bases, rev 1.
Attachments: North Anna Technical Specification Bases (2013_2014 Submission) Editoria....docx

Hi,

Please see the attached editorial comments for Technical Bases.
We are sending these for your consideration.

Please let me know if you have any questions.

Sincerely,

John Klos, Project Manager
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From: Klos, John

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North Anna Technical Specification Bases (2013/2014 Submittal) Editorial Comments

The NRC staff reviewed the correction of minor comments in the Technical Specifications Bases (FSAR Chapter 16B). These comments were editorial in nature and were items that were not in accordance with the Writer's Guide For Plant-Specific Improved Technical Specifications (TSTF-GG-05-01). The staff also reviewed the Technical Specifications and the Bases within the 2014 submittal for accuracy, and the staff's comments are discussed below.

2013 Submittal Comments/Resolution

- Section B 3.3.3.2
 - All 5 pages for this section have incomplete page numbers at the bottom of the pages. The pages are marked "-1", "-2", etc. vice "B 3.3.3.2-1", "B 3.3.3.2-2", etc. in accordance with TSTF-GG-05-01, Section 2.1.2.f.
 - The staff verified that this issue has been corrected on all affected pages.
- Page B 3.3.6.3-19
 - No single line running along the bottom of the page in accordance with TSTF-GG-05-01, Section 2.1.6 "Double and Single Line Format".
 - The staff verified that this issue has been corrected.
- Page B 3.10.4-5
 - References section labeled "REFERENCE" vice "REFERENCES" in accordance with TSTF-GG-05-01, Section 4.2.1.g, which states that the subsection is titled "References".
 - This was a global issue, and although many occurrences of this error were corrected, the correction was not made on page B 3.10.4-5.
- TSTF-GG-05-01, Section 2.4.2.e.2, discusses when a section or specification is continued from one page to the next. When text is continued, the next page has the following requirements: "The continued Section or Specification header is repeated one blank line below the single line at the top of the continued page. The "(continued)" appears immediately below the Section or Specification heading indented two spaces from the left margin." The following pages need to address this requirement:
 - Page B 3.7.6-3
 - First section should be marked "LCO (continued)".
 - Page B 3.3.1.4-21
 - Section should be marked "REFERENCES (continued)".
 - Page B 3.3.6.3-16
 - First section should be marked "APPLICABLE SAFETY ANALYSIS, LCO, and APPLICABILITY (continued)".
 - Page B 3.6.1.5-2
 - First section incorrectly marked "CONTAINMENT SAFETY ANALYSIS (contained)" vice "APPLICABLE SAFETY ANALYSIS (continued)".

- Page B 3.7.6-3

- First section should be marked “LCO (continued)”.

The staff verified that the five occurrences of the issue listed above have been corrected.

2014 Submittal Comments

- Page B 3.10.4-5 (Unresolved Issue from 2013 submittal)

References section labeled “REFERENCE” vice “REFERENCES” in accordance with TSTF-GG-05-01, Section 4.2.1.g, which states that the subsection is titled “References”.

- Page B 2.1.2-2

There is no line break (blank line) between the last line of text of the Safety Limits section and the single line that separates the sections within the Bases. TSTF-GG-05-01, Section 2.7.2.d, states “A Bases subsection is separated from the subsequent subsection by a single line. One blank line appears above and below the single line.”

- Page B 3.4.4-7

Within the list of References (which are seen as Ordered Lists), the text for Reference 6 is indented too far and does not align with the text of References 1-5. TSTF-GG-05-01, Section 2.1.3, discusses Ordered List Formatting and has an example of proper text alignment within an ordered list.

- Page B 3.7.2-13 (various inconsistencies)

The Revision 6 change table (on page ii of the Chapter 16 front matter) at the beginning of Part 4 included an item that states “Deleted “No” from Group 2, N-DCIS”. This item is correctly implemented on page B 3.7.2-13, however, there are 2 additional occurrences of “No” on this page: in the Control Room Habitability Area list of rooms in the CRHA Heat Sink Group 1 section and in the Q-DCIS equipment rooms list of rooms in the CRHA Heat Sink Group 2 section.

A second inconsistency occurs in the CRHA Heat Sink Group 1 section, in the list of rooms under the Control Room Habitability Area heading. There is a colon after the word “Rooms”. In every other section in the table, the colons appear immediately before the word “Rooms” and the list of room numbers.

A third inconsistency occurs in the CRHA Heat Sink Group 1 section under the Corridors heading. There is no space after the comma between room numbers “3277,3274”.

- Page ii (Chapter 16 front matter)

On page ii, the final line item in the Revision 6 Revision table states: “Changed title from “SHUTDOWN MARGIN – (SDM) Test Refueling” to “SHUTDOWN MARGIN (SDM) – Test Refueling.” The Bases title was actually changed to “SHUTDOWN MARGIN (SDM) Test – Refueling.” The title was not changed as described on Page ii, however, it was changed to the correct title. The staff verified that the title, “SHUTDOWN MARGIN (SDM) Test – Refueling”, was the correct Bases title by comparing it to section 3.10.8 of the TS for both the North Anna TS and well as the TS of the ESBWR DCD. The error lies solely on page ii of the Chapter 16 front matter.

The applicant should respond to the comments listed above and make the corrections as necessary prior to the next submittal. Also, the applicant should perform a global check of the Technical Specifications (Chapter 16) and the Bases (Chapter 16B) to ensure all requirements of TSTF-GG-05-01 are met.