

NRR-PMDAPEm Resource

From: Wiebe, Joel
Sent: Thursday, August 14, 2014 8:35 AM
To: Dwi Murray
Cc: David Gullott
Subject: Clarification of July 22, 2014, Request for Additional Information Regarding Braidwood/Byron LAR Regarding Auxiliary Feedwater Cross-tie

The following is a clarification of RAI #3 in my July 22, 2014, RAI.

3. The January 31, 2012, submittal proposed UFSAR changes that authorize use of the AF cross-tie in the event of a beyond design basis accident in a unit. The changes recognize that the AF pump used to supply water through the cross-tie is inoperable for the non-accident unit and proposes to use the current technical specification (TS) ACTIONS CONDITION A to limit operation of the non-accident unit. Exelon states that this is a temporary relaxation of the single failure criterion for the non-accident unit. The NRC staff's preliminary determination is that use of TS ACTIONS CONDITION A in this manner is not acceptable and cannot be approved. The use of TS ACTIONS CONDITION A is for those instances which are inadvertent (equipment failure) or are intended to improve the reliability or risk (corrective or preventive maintenance) to the unit the equipment is designed to support. The fact that a temporary relaxation of the single failure criteria is necessary indicates that the equipment is not designed to support the other unit.

Provide additional information or supplement the submittal to provide an acceptable resolution.

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