

NRR-PMDAPEm Resource

From: Saba, Farideh
Sent: Friday, June 12, 2015 8:04 AM
To: 'Szabo, Clinton William'; 'Williams, Gordon Robert'
Cc: 'Schrull, Edward Dustin'; Robinson, Jay
Subject: Browns Ferry NFPA 805 LAR

Importance: High

Gordon and Clint,

The NRC staff has identified another implementation item that should be added to the final Attachment S (license conditions). This is based on the TVA's commitment in the letter dated May 16, 2013, which is also discussed in TVA's June 13, 2014 letter, to revise the performance monitoring program that monitors the RHR heat exchanger performance. Please see TVA's RAI response in June 13, 2014, letter, below.

The revised performance monitoring program has not been developed at this time. Commitment 2 in Enclosure 2 to TVA letter dated May 16, 2013, "Response to NRC Request to Supplement License Amendment Request to Adopt NFPA 805 Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants for the Browns Ferry Nuclear Plant, Units 1, 2, and 3 (TAC Nos. MF1185, MF1186, and MF1187)" (ADAMS Accession No. ML13141A291), provides the TVA commitment to revise the program that monitors the RHR heat exchanger performance. The commitment states that "TVA will revise the program that monitors BFN Residual Heat Removal (RHR) heat exchanger performance for consistency with the assumptions of the NFPA 805 Net Positive Suction Head (NPSH), Containment Parameters, and AREVA Fuel peak centerline temperature (PCT) Analysis calculation related to the RHR heat exchanger k-factor within 6 months following NRC approval of the NFPA 805 amendment request." TVA intends to include, as requirements in the program, periodic heat exchanger inspections and heat exchanger performance testing requirements to ensure fouling factor assumptions and tube plugging assumptions in the NFPA 805 containment analysis remain valid.

This item should be incorporated into the TVA's LAR Attachment S that will be tied to the new NFPA 805 license condition, since the staff's approval of NFPA 805 specific to Attachment X relies on this commitment. The attachment S should add an implementation item that states: "Revise the program that monitors BFN Residual Heat Removal (RHR) heat exchanger performance for consistency with the assumptions of the NFPA 805 Net Positive Suction Head (NPSH), Containment Parameters, and AREVA Fuel peak centerline temperature (PCT) Analysis calculation related to the RHR heat exchanger k-factor." This is directly from TVA's May 16, 2013 submittal.

In addition, Item 37 in Table S-3 of Attachment S states:

Revise design output to ensure interior epoxy floor finishes meet the Class II requirements and interior carpet floor finishes meet the Class I requirements.

In order to meet NFPA 805, epoxy floor finishes need to meet Class I requirements, not Class II. Therefore, Item 37 should state:

Revise design output to ensure interior epoxy floor finishes meet the Class I requirements and interior carpet floor finishes meet the Class I requirements.

Thanks,

Farideh

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