

NRR-PMDAPEm Resource

From: Jackson, Diane
Sent: Friday, July 10, 2015 2:09 PM
To: Shams, Mohamed
Cc: DiFrancesco, Nicholas; Wyman, Stephen; Spence, Jane; Devlin-Gill, Stephanie; Roche, Kevin; Yee, On; Rodriguez, Ricardo; Ng, Ching; Park, Sunwoo; Heeszel, David; Hsu, Kaihwa; 50.54f_Seismic Resource; RidsNroDsea Resource
Subject: BROWNS FERRY NUCLEAR STATION - TECHNICAL REVIEW CHECKLIST RELATED TO INTERIM ESEP SUPPORTING IMPLEMENTATION OF NTTF R2.1, SEISMIC (TAC NO. MF5225, MF5226, and MF5227)
Attachments: Browns Ferry R2.1 Seismic ESEP NRC review.docx

July 10, 2015

MEMORANDUM TO: Mohamed K. Shams, Chief
Hazards Management Branch (JHMB)
Japan Lessons-Learned Division
Office of Nuclear Reactor Regulation

FROM: Diane T. Jackson, Chief
Geosciences and Geotechnical Engineering Branch 2 (RGS2)
Division of Site Safety and Environmental Analysis
Office of New Reactors

SUBJECT: BROWNS FERRY NUCLEAR STATION, UNITS 1, 2, AND 3 - TECHNICAL REVIEW CHECKLIST
RELATED TO INTERIM EXPEDITED SEISMIC EVALUATION PROCESS
SUPPORTING IMPLEMENTATION OF NTTF RECOMMENDATION 2.1,
SEISMIC, RELATED TO THE FUKUSHIMA DAI-ICHI NUCLEAR POWER PLANT
ACCIDENT (TAC NO. MF5225, MF5226, AND MF5227)

The NRC technical staff working through the Geosciences and Geotechnical Engineering Branches 1 and 2 (RGS1 and RGS2) completed the Technical Review Checklist of the BROWNS FERRY NUCLEAR STATION, UNITS 1, 2, AND 3 response to Enclosure 1, Item (6) of the March 12, 2012, request for information letter issued per Title 10 of the Code of Federal Regulations, Subpart 50.54(f), to power reactor licensees and holders of construction permits requesting addressees to provide further information to support the NRC staff's evaluation of regulatory actions to be taken in response to Fukushima Near-Term Task Force (NTTF) Recommendation 2.1: Seismic which implements lessons learned from Japan's March 11, 2011, Great Tōhoku Earthquake and subsequent tsunami. This addresses the staff review of the interim Expedited Seismic Evaluation Process (ESEP) report in response to Requested Item (6) of Enclosure 1, "Recommendation 2.1: Seismic," of the 50.54(f) letter. Attached is a file containing the technical review checklist to prepare a response letter to the licensee.

The NRC staff reviewed the information provided and, as documented in the enclosed staff checklist, determined that sufficient information was provided to be responsive to this portion of the Enclosure 1 of the 50.54(f) letter. The application of this staff review is limited to the interim ESEP as part of NTTF R2.1: Seismic activities.

This electronic memo constitutes the DSEA concurrence provided that only editorial changes are made to the staff assessment that would not affect the technical conclusions or technical context of the assessment.

This concludes the NRC's efforts associated with TAC NO. MF5225, MF5226, and MF5227 for the review of the interim ESEP report for the BROWNS FERRY NUCLEAR STATION, UNITS 1, 2, AND 3.

Docket No: 50-259, 50-260 and 50-296

CONTACT: Stephanie Devlin-Gill
Office of New Reactors
301-415-5301

Copy: Nicholas DiFrancesco, Steve Wyman, Jane Spence, Stephanie Devlin-Gill, Kevin Roche, On Yee, Ricardo Rodriguez, Ching Ng, Sunwoo Park, Robert Hsu, David Heeszal, 50.54f_Seismic Resource,; RidsNroDsea Resource

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RELATED TO INTERIM ESEP SUPPORTING IMPLEMENTATION OF NTTF R2.1, SEISMIC (TAC NO.
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Received Date: 7/10/2015 2:08:56 PM

From: Jackson, Diane

Created By: Diane.Jackson@nrc.gov

Recipients:

"DiFrancesco, Nicholas" <Nicholas.DiFrancesco@nrc.gov>

Tracking Status: None

"Wyman, Stephen" <Stephen.Wyman@nrc.gov>

Tracking Status: None

"Spence, Jane" <Jane.Spence@nrc.gov>

Tracking Status: None

"Devlin-Gill, Stephanie" <Stephanie.Devlin-Gill@nrc.gov>

Tracking Status: None

"Roche, Kevin" <Kevin.Roche@nrc.gov>

Tracking Status: None

"Yee, On" <On.Yee@nrc.gov>

Tracking Status: None

"Rodriguez, Ricardo" <Ricardo.Rodriguez@nrc.gov>

Tracking Status: None

"Ng, Ching" <Ching.Ng@nrc.gov>

Tracking Status: None

"Park, Sunwoo" <Sunwoo.Park@nrc.gov>

Tracking Status: None

"Heeszel, David" <David.Heeszel@nrc.gov>

Tracking Status: None

"Hsu, Kaihwa" <Kaihwa.Hsu@nrc.gov>

Tracking Status: None

"50.54f_Seismic Resource" <50.54f_Seismic.Resource@nrc.gov>

Tracking Status: None

"RidsNroDsea Resource" <RidsNroDsea.Resource@nrc.gov>

Tracking Status: None

"Shams, Mohamed" <Mohamed.Shams@nrc.gov>

Tracking Status: None

Post Office: HQPWMSMRS04.nrc.gov

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TECHNICAL REVIEW CHECKLIST
BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO EXPEDITED SEISMIC EVALUATION PROCESS INTERIM EVALUATION
IMPLEMENTING NTTF RECOMMENDATION 2.1 SEISMIC
BROWNS FERRY NUCLEAR PLANT, UNITS 1, 2, AND 3
DOCKET NOS. 50-259, 50-260, AND 50-296

By letter dated March 12, 2012 (USNRC, 2012a), the U.S. Nuclear Regulatory Commission (NRC) issued a request for information to all power reactor licensees and holders of construction permits in active or deferred status, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.54(f) "Conditions of License" (hereafter referred to as the "50.54(f) letter"). Enclosure 1 of the 50.54(f) letter requests addressees to reevaluate the seismic hazard at their site using present-day methods and guidance for licensing new nuclear power plants, and identify actions to address or modify, as necessary, plant components affected with the reevaluated seismic hazards. Requested Information Item (6) in Enclosure 1 to the 50.54(f) letter requests addressees to provide an interim evaluation and actions taken or planned to address a higher seismic hazard relative to the design basis, as appropriate, prior to completion and submission of the seismic risk evaluation.

Additionally, by letter dated April 12, 2013¹, the Electric Power Research Institute (EPRI) staff submitted EPRI TR 3002000704 "Seismic Evaluation Guidance: Augmented Approach for the Resolution of Fukushima Near-Term Task Force (NTTF) Recommendation 2.1: Seismic" (hereafter referred to as the guidance). The Augmented Approach proposed that licensees would use an Expedited Seismic Evaluation Process (ESEP) to address the interim actions as requested by Information Item (6) in the 50.54(f) letter. The ESEP is a simplified seismic capacity evaluation with a focused scope of certain key installed Mitigating Strategies equipment that is used for core cooling and containment functions to cope with scenarios that involve a loss of all AC power and loss of access to the ultimate heat sink to withstand the Review Level Ground Motion, which is up to two times the safe shutdown earthquake (SSE). Due to the expedited and interim nature of the ESEP, the assessment does not include many considerations that are part of a normal risk evaluation. These deferred items, include but are not limited to, structures, piping, non-seismic failures, and operator actions, as well scenarios such as addressing loss of coolant accidents. By letter dated May 7, 2013², the NRC staff endorsed the guidance. Central and eastern United States licensees with a reevaluated seismic hazard exceeding the SSE submitted an ESEP interim evaluation in December 2014

Consistent with the interim nature of this activity, the staff performed the review of the licensee's submittal to assess whether the intent of the guidance was implemented. A multi-disciplined team checked whether the identified methods were consistent with the guidance. A senior expert panel reviewed the team's questions, if any, and checklist for consistency and scope. New or updated parameters (e.g., In-Structure Response Spectra, High Confidence of Low Probability of Failure calculations) presented by the licensees were assessed only based on licensee statements for acceptability for the Item (6) response. The application of this staff review is limited to the ESEP interim evaluation as part of NTTF R2.1: Seismic activities.

¹ ADAMS Accession No. ML13102A142

² ADAMS Accession No. ML13106A331

NTTF Recommendation 2.1 Expedited Seismic Evaluation Process

Technical Review Checklist for Browns Ferry Nuclear Plant, Units 1, 2 and 3

By letter dated December 22, 2014³, Tennessee Valley Authority (the licensee) provided an Expedited Seismic Evaluation Process (ESEP) report in a response to Enclosure 1, Requested Information Item (6) of the 50.54(f) letter, for the Browns Ferry Nuclear Plant, Units 1, 2, and 3.

I. Review Level Ground Motion

The licensee:	
• described the determination of the review level ground motion (RLGM) using one of the means acceptable by the guidance	Yes
• identified location of the control point and is consistent with March submittal	Yes
• compared the site ground motion response spectra used to select the ESEP RLGM to the SSE.	Yes
Browns Ferry used a scaled SSE at a ratio of 2.0 in accordance with the guidance because the GMRS is above two times the SSE.	
Notes from the Reviewer: None	
Deviation(s) or Deficiency(ies), and Resolution:	
• No deviations or deficiencies were identified.	
The NRC staff concludes:	
• the licensee's RLGM meets the intent of the guidance	Yes
• the RLGM is reasonable for use in the interim evaluation.	Yes

II. Selection of the Success Path

The licensee:	
• described the success path	Yes
• described normal and desired state of the equipment for the success path	Yes
• ensured that the success path is consistent with the plant's overall mitigating strategies approach or provided a justification for an alternate path	Yes
• stated that the selection process was in accordance with the guidance or meets the intent of the guidance	Yes
• used installed FLEX Phase 1 equipment as part of the success path	Yes
• included FLEX Phase 2 and/or 3 <u>connections</u>	Yes
• considered installed FLEX Phase 2 and/or 3 <u>equipment</u>	Yes
Notes from the Reviewer: None	
Deviation(s) or Deficiency(ies), and Resolution:	
• No deviations or deficiencies were identified.	
The NRC staff concludes that:	
• the selected success path is reasonable for use in the interim evaluation	Yes
• the licensee considered installed Phase 2 and 3 connections or equipment in the interim evaluation.	Yes

³ ADAMS Accession No. ML14365A046

NTTF Recommendation 2.1 Expedited Seismic Evaluation Process

Technical Review Checklist for Browns Ferry Nuclear Plant, Units 1, 2 and 3

III. Selection of the Equipment List

<p>The licensee:</p> <ul style="list-style-type: none"> • developed and provided the ESEL by applying the ESEP • identified equipment considering the following functions: <ul style="list-style-type: none"> ○ Core cooling (with focus on Mode 1) function ○ Available, sustainable water source ○ Containment function and integrity 	<p>Yes</p> <p>Yes</p> <p>Yes</p> <p>Yes</p>
<p>Notes from the Reviewer:None</p> <p>Deviation(s) or Deficiency(ies), and Resolution:</p> <ul style="list-style-type: none"> • No deviations or deficiencies were identified. 	
<p style="text-align: center;"><u>For PWR Plants ONLY</u></p> <p>The licensee included indicators / instrumentation for the following functions: level, pressure, temperature, that would be indicative of (but not explicitly identified to specific instruments): water level of the steam generator (SG), pressure of SG, containment, and reactor coolant system (RCS); and temperature of the RCS.</p>	<p>N/A</p>
<p style="text-align: center;"><u>For BWR Plants ONLY</u></p> <p>The licensee considered indicators for the following functions: level, pressure, temperature that would be indicative of (but not explicitly identified to specific instruments): Temperature of suppression pool, RCS, containment); Pressure of suppression pool, RCS, and drywell; water level of the suppression pool.</p>	<p>Yes</p>
<p>Notes from the Reviewer:</p> <ul style="list-style-type: none"> • The staff requested clarification on whether HCLFP evaluations will be performed when those “non-portable” FLEX components are installed in the future. The licensee explained (ML15189A235) that any equipment required for the success of the FLEX strategy is evaluated using the ESEP criteria. The staff concluded this response is acceptable for this interim evaluation. • The staff requested the licensee to explain why certain components are not included in the ESEL for Units 1, 2, & 3. The licensee explained (ML15189A235) that these components either were excluded per EPRI Report 3002000704 or not part of the credited mitigating strategies. The staff concluded this response is acceptable for this interim evaluation. <p>Deviation(s) or Deficiency(ies), and Resolution:</p> <ul style="list-style-type: none"> • No deviations or deficiencies were identified. 	
<p>Through a sampling of the ESEP key components, the NRC staff concludes that:</p> <ul style="list-style-type: none"> • the licensee’s process to develop the ESEL meets the intent of the guidance for the interim evaluation • the desired equipment state for the success path were identified • the licensee considered the support equipment for the ESEL • both front-line and support systems appeared to be included in the ESEL as evidenced by inclusion of SSCs on the success path and of support systems (e.g., batteries, motor control center, inverters). 	<p>Yes</p> <p>Yes</p> <p>Yes</p> <p>Yes</p>

NTTF Recommendation 2.1 Expedited Seismic Evaluation Process

Technical Review Checklist for Browns Ferry Nuclear Plant, Units 1, 2 and 3

IV. Walkdown Approach

<p>The licensee:</p> <ul style="list-style-type: none"> described the walkdown screening approach, including walk-bys and walkdowns performed exclusively for the ESEP, in accordance with the guidance credited previous walkdown results, including a description of current action(s) to verify the present equipment condition and/or configuration (e.g., walk-bys), in accordance with the guidance stated that the walkdown was performed by seismically trained personnel 	<p>Yes</p> <p>Yes</p> <p>Yes</p>
<p>Notes from the Reviewer:None</p> <p>Deviation(s) or Deficiency(ies), and Resolution:</p> <ul style="list-style-type: none"> No deviations or deficiencies were identified. 	
<p>The licensee:</p> <ul style="list-style-type: none"> described, in needed, adverse material condition of the equipment (e.g. material degradation) credited previous walkdown results, included a description of current action(s) to verify the present equipment condition (e.g., walk-bys), meeting the intent of the guidance 	<p>Yes</p> <p>Yes</p>
<p>The licensee:</p> <ul style="list-style-type: none"> described the conditions of structural items considered for the interim evaluation, including: <ul style="list-style-type: none"> spatial interactions (i.e. interaction between block walls and other items/components) anchorage piping connected to tanks (i.e. differential movement between pipes and tanks at connections) 	<p>Yes</p> <p>Yes</p> <p>Yes</p>
<p>Notes from the Reviewer:None</p> <p>Deviation(s) or Deficiency(ies), and Resolution:</p> <ul style="list-style-type: none"> No deviations or deficiencies were identified. 	
<p>The licensee reported deviations for Browns Ferry.</p>	<p>No</p>
<p>If deviations were identified, there is a discussion of how the deficiencies were or will be addressed in the ESEP submittal report.</p>	<p>N/A</p>
<p>The NRC staff concludes that:</p> <ul style="list-style-type: none"> the licensee described the performed walkdown approach, including any credited previous efforts (e.g. Individual Plant Examination of External Events(IPEEE)) consistent with the guidance the licensee addressed identified deviations consistent with the guidance, if any 	<p>Yes</p> <p>Yes</p>

NTTF Recommendation 2.1 Expedited Seismic Evaluation Process

Technical Review Checklist for Browns Ferry Nuclear Plant, Units 1, 2 and 3

V. Capacity Screening Approach and HCLPF Calculation Results

<p>The licensee:</p> <ul style="list-style-type: none"> described the capacity screening process for the ESEL items, consistent with the guidance (e.g., use of EPRI NP-6041 screening table). presented the results of the screened-out ESEL items in the ESEP report described the development of in-structure response spectra (ISRS) based on scaling described the development of ISRS based on new analysis consistent with the guidance described the method for estimating HCLPF capacity of screened-in ESEL items, including both structural and functional failure modes consistent with the guidance: <ul style="list-style-type: none"> use of Conservative Deterministic Failure Margin (CDFM) use of fragility analysis (FA) use of experience data or generic information credited IPEEE spectral shape for HCLPF capacity estimates is similar to or envelopes the RLGM, and anchored at the same control point presented the results of HCLPF capacities including associated failure modes for screened-in ESEL items reviewed the ESEL items with the lowest HCLPF values to ensure that their capacities are equal or greater than the RLGM 	<p>Yes</p> <p>Yes</p> <p>Yes N/A</p> <p>Yes</p> <p>Yes N/A Yes Yes</p> <p>Yes</p> <p>Yes</p>
<p>Notes from the Reviewer:</p> <ul style="list-style-type: none"> The staff requested clarification regarding relative control point locations for IPEEE review level earthquake (RLE), SSE and GMRS. The licensee stated (ML15189A235) that the IPEEE RLE control point location is the same as the SSE and GMRS control point locations. The staff concluded this response is acceptable for this interim evaluation. The staff requested clarification regarding the method used for screening items located at elevations beyond 40 ft above grade. The licensee stated (ML15189A235) that items located beyond 40 ft above grade were screened out by following guidance in EPRI 1019200 and referenced the TVA calculation. The staff concluded this response is acceptable for this interim evaluation. The staff requested clarification regarding HCLPF capacity evaluations for certain components mentioned in the ESEP report but whose results are not provided in the report. The licensee provided (ML15189A235) the requested information (HCLPF evaluation results) and referenced the TVA calculation. The staff concluded this response is acceptable for this interim evaluation. The staff requested clarification regarding how ESEL items not included in the IPEEE program were evaluated. The licensee provided (ML15189A235) an explanation of the evaluation process. The staff concluded this response is acceptable for this interim evaluation. <p>Deviation(s) or Deficiency(ies), and Resolution:</p> <ul style="list-style-type: none"> No deviations or deficiencies were identified. 	

NTTF Recommendation 2.1 Expedited Seismic Evaluation Process

Technical Review Checklist for Browns Ferry Nuclear Plant, Units 1, 2 and 3

The NRC staff concludes that:	
• the licensee described the implementation of the capacity screening process consistent with the intent of the guidance	Yes
• the licensee presented capacity screening and calculation results, as appropriate, in the ESEP report	Yes
• the method used to develop the ISRS is consistent with guidance for use in the ESEP	Yes
• for HCLPF calculations, the licensee used HCLPF calculation methods as endorsed in the guidance	Yes
• no anomalies were noted in the reported HCLPF	Yes

VI. Inaccessible Items

The licensee:	
• provided a list of inaccessible items	Yes
• provided a schedule of the planned walkdown and evaluation for all inaccessible items	N/A
• provided Regulatory Commitment to complete walkdowns.	N/A
Browns Ferry will provide results or complete walkdown by: <u>N/A</u>	
Notes from the Reviewer: <ul style="list-style-type: none"> The staff requested clarification regarding the photographs used by the SRT to disposition inaccessible items. The licensee stated in its response (ML15189A235) that the photographs were observed on the Browns Ferry Video Tours Omnicast Web Viewer page. The staff finds that the licensee response adequately addressed the question for this interim evaluation. 	
Deviation(s) or Deficiency(ies), and Resolution: <ul style="list-style-type: none"> No deviations or deficiencies were identified. 	
The NRC staff concludes that the licensee:	
• listed inaccessible items	Yes
• committed to provide the results (e.g., walkdowns, walk-bys) of the remaining inaccessible items consistent with the guidance	N/A
• substitutions, if needed, were appropriately justified	N/A

VII. Modifications to Plant Equipment

The licensee:	
• identified modifications for ESEL items necessary to achieve HCLPF values that bound the RLGM (excluding mitigative strategies equipment (FLEX)), as specified in the guidance	No – N/A
• provided a schedule to implement such modifications (if any), consistent with the intent of the guidance	N/A
• provided Regulatory Commitment to complete modifications	N/A
• provided Regulatory Commitment to report completion of modifications.	N/A
Browns Ferry will:	
• complete modifications by <u>N/A</u>	
• report completion of modifications by <u>N/A</u>	

NTTF Recommendation 2.1 Expedited Seismic Evaluation Process

Technical Review Checklist for Browns Ferry Nuclear Plant, Units 1, 2 and 3

Notes from the Reviewer: None		
Deviation(s) or Deficiency(ies), and Resolution: <ul style="list-style-type: none">No deviations or deficiencies were identified.		
The NRC staff concludes that the licensee: <ul style="list-style-type: none">identified plant modifications necessary to achieve the target seismic capacityprovided a schedule to implement the modifications (if any) consistent with the guidance		N/A
		N/A

VIII. Conclusions:

The NRC staff assessed the licensee's implementation of the ESEP guidance. Due to the interim applicability of the ESEP evaluations, use of the information for another application would require a separate NRC review and approval. Based on its review, the NRC staff concludes that the licensee's implementation of the interim evaluation meets the intent of the guidance. The staff concludes that, through the implementation of the ESEP guidance, the licensee identified and evaluated the seismic capacity of certain key installed Mitigating Strategies equipment that is used for core cooling and containment functions to cope with scenarios that involve a loss of all AC power and loss of access to the ultimate heat sink to withstand a seismic event up to the Review Level Ground Motion (RLGM). In the case of Browns Ferry, the RLGM was set at the maximum ratio of two times the SSE in accordance with the guidance because the GMRS is above two times the SSE. The application of this staff review is limited to the ESEP interim evaluation as part of NTTF R2.1: Seismic activities. As noted in the review checklist, the staff did not identify deviations or exceptions were taken from the guidance. The licensee found all equipment evaluated for the ESEP to have adequate capacity for the required demand. Therefore, no modification of equipment was required.

In summary, the licensee, by implementing the ESEP interim evaluation, has demonstrated additional assurance which supports continued plant safety while the longer-term seismic evaluation is completed to support regulatory decision making. The NRC staff concludes that the licensee responded appropriately to Enclosure 1, Item (6) of the 50.54(f) letter, dated March 12, 2012, for Browns Ferry Nuclear Plant, Units 1, 2 and 3.

Principle Contributors:Ricardo Rodriguez, Ching Ng, Sunwoo Park, Robert Hsu, On Yee, David Heeszel, and Joseph Braverman (NRC Consultant)