

NRR-PMDAPeM Resource

From: Kirkpatrick, Brenda M. [bmkirkp@nppd.com]
Sent: Wednesday, July 01, 2015 1:04 PM
To: Wyman, Stephen
Cc: DiFrancesco, Nicholas
Subject: [External_Sender] RE: Cooper ESEP Clarification Questions
Attachments: ESEP Clarification.pdf

Steve –

Attached is NPPD's response in regard to the clarification needed for Cooper's ESEP. Please feel free to call me if you need additional assistance.

Brenda Kirkpatrick
402-825-5762

From: Kirkpatrick, Brenda M.
Sent: Thursday, June 25, 2015 3:02 PM
To: 'Stephen.Wyman@nrc.gov'
Subject: RE: Cooper ESEP Clarification Questions

Hi Steve –

I have forwarded this email to our engineer responsible for Fukushima seismic responses. We expect to be able to provide the information you requested by 6/30 or 7/1. Would you prefer it if we uploaded the response to our e-Portal?

Brenda Kirkpatrick
402-825-5762
bmkirkp@nppd.com

From: Wyman, Stephen [<mailto:Stephen.Wyman@nrc.gov>]
Sent: Thursday, June 18, 2015 11:43 AM
To: Shaw, Jim D.
Cc: DiFrancesco, Nicholas; Devlin-Gill, Stephanie
Subject: Cooper ESEP Clarification Questions

Mr. Shaw,

In follow-up to the message I left with your assistant today, as part of the NRC review of the Cooper ESEP report, the staff would appreciate clarification on the following technical item:

The following clarification questions are raised in the context of the NRC evaluation of the ESEP submittals only and licensees' responses will be reviewed by NRC staff only to the extent the use of this information affects the elements and outcomes of the ESEP evaluation. As many licensees have used information from their ongoing SPRA analyses, the current review will not evaluate methods or results as they pertain to the SPRA. They will be reviewed later at the time of SPRA review.

1. Section 7 of the ESEP report identifies ESEL items inaccessible for walkdowns. The licensee provided various ways of dispositioning these items including the use of photographic evidence. In order for the staff to assess

the current condition or state of the inaccessible items please provide dates or ranges of dates said pictures were taken.

An email response will likely be sufficient to support the ESEP report review, however, please be aware that your email response will be made publicly available in ADAMS. A response around June 30, if practicable, would be greatly appreciated to support the planned review schedule.

Please let me or Nick DiFrancesco (at 301-415-1115) know if you would like to schedule a clarification call or have any questions and concerns.

Thanks,
Steve

Stephen M. Wyman

USNRC/NRR/JLD/HMB

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Subject: [External_Sender] RE: Cooper ESEP Clarification Questions
Sent Date: 7/1/2015 1:03:44 PM
Received Date: 7/1/2015 1:06:21 PM
From: Kirkpatrick, Brenda M.

Created By: bmkirkp@nppd.com

Recipients:
"DiFrancesco, Nicholas" <Nicholas.DiFrancesco@nrc.gov>
Tracking Status: None
"Wyman, Stephen" <Stephen.Wyman@nrc.gov>
Tracking Status: None

Post Office: cgoexg41

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MESSAGE	2612	7/1/2015 1:06:21 PM
ESEP Clarification.pdf	143519	

Options
Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received:

Following the submittal of Cooper Nuclear Station's (CNS) Expedited Seismic Evaluation Process (ESEP) Report to the Nuclear Regulatory Commission (NRC) (correspondence NLS2015043; dated April 29, 2015), the NRC requested the following clarification regarding components that were inaccessible during the Expedited Seismic Equipment List (ESEL) walk downs:

NRC Request:

The following clarification questions are raised in the context of the NRC evaluation of the ESEP submittals only and licensees' responses will be reviewed by NRC staff only to the extent the use of this information affects the elements and outcomes of the ESEP evaluation. As many licensees have used information from their ongoing SPRA analyses, the current review will not evaluate methods or results as they pertain to the SPRA. They will be reviewed later at the time of SPRA review.

- 1. Section 7 of the ESEP report identifies ESEL items inaccessible for walkdowns. The licensee provided various ways of dispositioning these items including the use of photographic evidence. In order for the staff to assess the current condition or state of the inaccessible items please provide dates or ranges of dates said pictures were taken.*

NPPD Response:

The clarification requested is in regards to Attachment A, Section 7.1 of Engineering Report (ER) 15-007 "Expedited Seismic Evaluation Process (ESEP) Report in Response to the 50.54(f) Information Request Regarding Fukushima Near-Term Task Force Recommendation 2.1: Seismic for the Cooper Nuclear Station Acceptance."

ER 15-007 Attachment A, Section 7.1 states:

"7.1 Identification of ESEL Items Inaccessible For Walkdowns

Twenty four (24) ESEL items were not accessible to the SRT during the ESEP walkdowns at CNS due to plant operation, and two (2) ESEL items that were added late after the walkdowns are evaluated based on photographs provided by CNS. A description of circumstances and disposition for these items is provided below.

SRVs and their accumulators (see Section 6.3.2 for component IDs):

The SRVs were not walked down by the SRT due to Radiation Protection concerns given that the components are located within the Drywell and the station was not in outage during the available SRT walkdown window. The SRVs and their accumulators were walked down as part of the A-46 and IPEEE programs. In addition to the A-46 SEWS observations and photographs, the station provide(d) the SRT with additional photograph and design documents. The SRT reviewed design documents, A-46 SEWS and photographs and determined to be acceptable for evaluation of the SRVs and their accumulators (including the consideration of potential seismic interaction), with no further walkdowns, in accordance with the methodology of NP-6041.

Drywell Temperature Elements (see Section 6.3.2 for component IDs):

The Drywell temperature elements were not walked down by the SRT due to Radiation Protection concerns given that the components are located within the Drywell and the station was not in outage during the available SRT walkdown window. The temperature elements were walked down as part of the A-46 and IPEEE programs. The SRT reviewed the A-46 SEWS observation and photographs and determined to be acceptable for evaluation of the temperature elements (including the consideration of potential seismic interaction), with no further walkdowns, in accordance with the methodology of NP- 6041.

RCIC-MO-16 and RCIC-MO-21:

These valve were not walked down by the SRT due to the components being located in a contaminated and high radiation area, i.e. Steam Tunnel. Station photos and or design documentation were reviewed by the SRT and determined to be acceptable for evaluation of these RCIC MOVs (including the consideration of potential seismic interaction), with no further walkdowns, in accordance with the methodology of NP-6041.

MCC RA and LRP-PNL-PL1:

These items were added late after the walkdowns were performed and are screened based on photographs provided by CNS, design documentation, and previous walkdowns and reviewed by the SRT and determined to be acceptable."

Pictures for screening the following components were taken on the following date/date-ranges:

SRVs and their Accumulators:

SRV pictures are date stamped as February 13, 2006.

Accumulator pictures are from the A-46 effort (February 16, 1996) and training material generated prior to 2007; however, there have been no physical changes/modifications to the accumulators during the timeframe between pictures taken and present.

Drywell Temperature Elements:

Pictures for Drywell Temperature Elements are from the A-46 effort (December 20, 1995); however, there have been no physical changes/modifications to the temperature elements during the timeframe between pictures taken and present.

RCIC-MO-16 and RCIC-MO-21:

RCIC-MO-16 pictures were uploaded to the Cooper Nuclear Station network drive on April 4, 2003, however; there have been no physical changes/modifications to RCIC-MO-16 during the timeframe between pictures taken and present.

RCIC-MO-21 was screened per design documents (drawings and calculations). Plant design documents are representative of the current configuration of the plant.

MCC RA and LRP-PNL-PL1:

These pictures were taken April 9, 2015.