

KHNPDCDRAIsPEm Resource

From: Ward, William
Sent: Tuesday, August 04, 2015 3:53 PM
To: 'apr1400rai@khnp.co.kr'; KHNPDCDRAIsPEm Resource; 'Chang, Harry'; 'Yunho Kim (yshh8226@gmail.com)'; jiyong.oh5@gmail.com; daegeun.ahn@gmail.com; Mannon, Steven (steven.mannon@aecom.com)
Cc: Ciocco, Jeff; Lee, Samuel; Dias, Antonio; Umana, Jessica; Le, Hien
Subject: APR1400 Design Certification Application RAI 125-7975 (16 Technical Specifications)
Attachments: image001.jpg; APR1400 DC RAI 125 SPSB 7975.pdf

KHNP,

The attachment contains the subject request for additional information (RAI). This RAI was sent to you in draft form. Your licensing review schedule assumes technically correct and complete responses within 30 days of receipt of RAIs. However, KHNP requests, and we grant, 60 days to respond to the RAI question. We may adjust the schedule accordingly.

Please submit your RAI response to the NRC Document Control Desk.

Thank you,

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Subject: APR1400 Design Certification Application RAI 125-7975 (16 Technical Specifications)
Sent Date: 8/4/2015 3:52:43 PM
Received Date: 8/4/2015 3:52:44 PM
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REQUEST FOR ADDITIONAL INFORMATION 125-7975

Issue Date: 08/04/2015

Application Title: APR1400 Design Certification Review – 52-046

Operating Company: Korea Hydro & Nuclear Power Co. Ltd.

Docket No. 52-046

Review Section: 16 - Technical Specifications

Application Section: TS Section 3.6 and Base

QUESTIONS

16-25

10 CFR 50.36, "Technical Specifications" and 10 CFR 52.47(a)(11) provides the regulatory basis for the following questions. 10 CFR 50.36 sets forth requirements for technical specifications to be included as part of the operating license for a nuclear power facility. Subsection 52.47(a)(11) requires that technical specifications be provided in the application for a design certification.

NUREG-1432, "Standard Technical Specifications-Combustion Engineering Plants," provides NRC guidance on format and content of technical specifications as one acceptable means to meet 10 CFR 50.36 requirements.

SPR 16, Part III.2.A states, in part, "when reviewing a difference between the proposed TS provision and the reference TS provision, verify that the applicant's written technical or administrative reasoning in support of the difference is logical, complete, and clearly written."

1. On Page B 3.6.1-2, in the "ASA" section of the bases, the fourth paragraph states, in part, "... an allowable leakage rate of 0.1% of the containment volume per day ..." The term "volume" should be replaced with "air weight" to be consistent with key assumptions in the containment pressure response analysis described in DCD Section 6.2. Similar correction should be made on Page B 3.6.2-2, in the "ASA" section of the bases for TS 3.6.2.
2. On Page B 3.6.1-5, in the discussion of SR 3.6.1.1, the redundant paragraph at the end should be removed.
3. The discussion of SR 3.6.6.1 in the bases does not include the basis for the 31-day frequency. The applicant is requested to provide the basis for the stated frequency.
4. The TS 3.6.7 Bases do not provide sufficient supporting information with regard to the need for LCO 3.6.7 requirements. The LCO 3.6.7 statement reads almost the same as the one for LCO 3.9.3. Since the scope of "Applicability" for LCO 3.6.7 is different from the one for LCO 3.9.3, the staff expects to see a change to LCO 3.6.7.c.1 with respect to the term "equivalent" used in LCO 3.9.3 to mean "a HVAC or vapor barrier" which is not capable to support a pressurized containment condition as shown in the low-power-and-shutdown (LPSD) analysis. The applicant is requested to address the above staff's concerns and revise TS 3.6.7 and its associated bases accordingly.
5. In the discussions of Actions A.1 and A.2, and SR 3.6.7.1 in the Bases, the applicant did not provide the basis for the specified completion times and frequency. Also, for each bracketed information, provide a "Reviewer's Note" to address these COL items.