

NRR-PMDAPEm Resource

From: Clark, Jeffrey S.:(GenCo-Nuc) [Jeffrey.Clark2@exeloncorp.com]
Sent: Thursday, July 30, 2015 8:22 PM
To: Wyman, Stephen
Cc: DiFrancesco, Nicholas; Distel, David J.:(GenCo-Nuc); Aggarwal, Vinod K.:(GenCo-Nuc); Behrend, Chuck L.:(GenCo-Nuc); Mullens, Patrick J.:(GenCo-Nuc); Bennett, Patrick A.:(GenCo-Nuc)
Subject: [External_Sender] RE: Three Mile Island ESEP NRC Question Response
Attachments: Response to NRC Question for TMI ESEP Report 7 30 15 FINAL.docx

Mr. Wyman,

In response to your initial email request below, Exelon is pleased to provide you with the attached response (2 pages) to your question on the Three Mile Island ESEP Report submittal. Based on our previous discussions we are providing you this information on our extended date of July 30, 2015. Please feel free to contact us with any further questions or clarifications needed to support the NRC's ESEP report reviews.

Thank You,

Jeff Clark

Jeffrey S. Clark, PE

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Sent: Tuesday, July 21, 2015 10:00 AM
To: Clark, Jeffrey S.:(GenCo-Nuc)
Subject: [EXTERNAL]

TMI

Please hold a PM call with the licensee and ask them this clarification question, for which a verbal answer will likely suffice:

The staff's review of the HCLPF table noted that the rule-of-the-box is referenced for 20 out of the 100 ESEL items. Eleven (11) items (37, 40, 42, 43, 65, 69, 76, 80, 91, 93, and 96) have the note: "Rule of Box to CR Console CC". The staff could not identify the console in the ESEL. For 2 additional items (74, 75), the rule-of-the-box reference is to a "parent" component that the staff could not identify in the ESEL. Please identify where in the ESEL these 3 "parent" components are listed. If not listed in the ESEL, explain why it is not necessary to include them in the ESEL

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From: Clark, Jeffrey S.:(GenCo-Nuc)

Created By: Jeffrey.Clark2@exeloncorp.com

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Exelon Response to USNRC Questions for TMI ESEP Report

In response to the email request dated July 21, 2015 from the USNRC's Mr. Stephen Wyman, Exelon is pleased to provide you with the response below. Please feel free to contact us with any further questions or clarifications needed to support the NRC's ESEP report reviews.

Question 1:

The staff's review of the HCLPF table noted that the rule-of-the-box is referenced for 20 out of the 100 ESEL items. Eleven (11) items (37, 40, 42, 43, 65, 69, 76, 80, 91, 93, and 96) have the note: "Rule of Box to CR Console CC". The staff could not identify the console in the ESEL. For 2 additional items (74, 75), the rule-of-the-box reference is to a "parent" component that the staff could not identify in the ESEL. Please identify where in the ESEL these 3 "parent" components are listed. If not listed in the ESEL, explain why it is not necessary to include them in the ESEL.

Response to Question 1:

The ESEL "parent" components for all of the ESEL items listed in the question above are included in the TMI ESEP report submitted in December 2014 in Table B-1 "TMI Unit 1 ESEP HCLPF Values and Failure Mode Tabulation", but are not included in Table A-1 "TMI Unit 1 ESEL". The "parent" components are identified in the "Additional Discussion" column of Table B-1 and are dispositioned to "Tech Eval 14-00473" in all cases except for the "ICS NNI Power Monitoring Cabinet" which is dispositioned to the NP-6041, Table 2-4 screening criteria. All "parent" components associated with ESEL rule-of-the-box components were appropriately evaluated per EPRI 3002000704 (ESEP Guidance) and are documented in the referenced Technical Evaluation 14-00473, as applicable. The supporting technical basis for the evaluations is complete and referenced in the ESEP Report. Therefore, Exelon concludes that it is not necessary to include the subject host/parent components in the ESEL as the evaluations are complete.

Exelon recognizes that inclusion of the "parent" components would have resulted in a more complete and appropriate ESEL. The decision not to include may have been influenced by EPRI 3002000704 which is silent on including "parent" components separately on the ESEL.

The following tables are extensions of the submitted TMI ESEP report Tables A-1 and Table B-1 and include the 6 additional "parent" components associated with the ESEL items listed in the question above. These tables contain the identical format and information fields as in the submitted report and are intended

Exelon Response to USNRC Questions for TMI ESEP Report

to support the response to this question only. For each “parent” item the tables below provide the information that is included in the ESEP Report and the supporting technical documents.

TableA-1:Supplemental Lines

ESELItem Number	Equipment		Operating State		Notes/Comments
	ID	Description	Normal State	Desired State	
101	CC	Control Room Console Center Panel	In Service	In Service	Parent to ESEL Items: 37, 40, 76, 80, 91
102	PLF	Control Room Panel Left Front	In Service	In Service	Parent to ESEL Items: 42, 43, 96
103	PCL	Control Room Panel Center Left	In Service	In Service	Parent to ESEL Items: 65, 69, 93
104	Multiplexer Cabinet 3	Multiplexer Cabinet 3	In Service	In Service	Parent to ESEL Item: 74
105	ICS NNI Power Monitor Cabinet	ICS NNI Power Monitor Cabinet	In Service	In Service	Parent to ESEL Item: 75

TableB-1:Supplemental Lines

ESELItem Number	Equipment ID	FailureMode	HCLPF(g)	Additional Discussion
101	CC	Anchorage	0.50	HCLPFcalculated in TechEval14-00473.
102	PLF	Anchorage	0.50	HCLPFcalculated in TechEval14-00473.
103	PCL	Anchorage	0.50	HCLPFcalculated in TechEval14-00473.
104	Multiplexer Cabinet 3	Anchorage	0.33	HCLPFcalculated in TechEval14-00473.
105	ICS NNI Power Monitor Cabinet	Screened	>RLGM	MeetsNP-6041Table2-4caveats /anchorage(asapplicable) judgedtobeadequateby SRT.