

## **NRR-PMDAPEm Resource**

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**From:** Regner, Lisa  
**Sent:** Wednesday, January 27, 2016 1:47 PM  
**To:** 'Wayne Harrison'  
**Cc:** 'Michael Murray'; 'Sterling, Lance (lsterling@STPEGS.COM)'  
**Subject:** NRC info, call tomorrow - GSI-191

Wayne,

Proposed agenda for tomorrow (as modified by your email):

- Audit logistics
  - T-H at TX A&M
  - Debris, Risk at Albuquerque
  - Westinghouse HLS calc reschedule
- Secondary component analysis (EPNB), see below topics for discussion
- TS question (STSB), see below
- T-H sensitivity studies clarification

**Bridgeline: 877-929-8980**

**Passcode: 9150823**

Remaining EPNB question (others deleted):

Question 1(d): discuss whether any ASME Code Class 2 piping inside the containment, besides the main steam and feedwater lines, are evaluated for debris generation. If none, provide an explanation why Class 2 piping inside the containment were not evaluated. If the licensee has stated in its submittal that ASME Code class 2 piping are not evaluated then I can eliminate this question 1(d) as well.

Clarification Note: Based on the reference (ML13323A189) that STP gave me during the phone call last Thursday, STP stated that it considered steam line breaks in the containment as shown in Table 11-1 in ML13323A189. I would like to ask them whether they analyzed the consequence of the steam line breaks because section 12 (third paragraph, page 46 of 257) of ML13323a189 seems to say that steam line breaks were not evaluated.

New STSB question:

Title 10 of the Code of Federal Regulations (CFR) Part 50.36 (c)(2)(i) state the following:

Limiting conditions for operation are the lowest functional capability or performance levels of equipment required for safe operation of the facility. When a limiting condition for operation of a nuclear reactor is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the technical specifications until the condition can be met.

In the second supplement to license amendment request (LAR) for a risk-informed approach to resolving generic safety issue (GSI)-191, South Texas Project (STP) Nuclear Operating Company (the licensee) proposed the following new condition 'c.' for TS LCO 3/4.5.2, "ECCS SUBSYSTEMS - TAVG GREATER THAN OR EQUAL TO 350°F." This newly proposed can be found on page 2 of 4 of Attachment 3-1 of document NOC-AE-15003241 dated August 20, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15246A126):

c. With less than the required flow paths OPERABLE solely due to potential effects of LOCA generated and transported debris that exceeds analyzed amounts, perform the following:

1. Immediately initiate action to implement compensatory actions,

AND

2. Within 90 days restore the affected flowpath(s) to OPERABLE status,

OR

Be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

#### Request

The NRC needs additional information on whether the 90-day proposed completion time is adequate for certain scenarios. For instance, 90 days may be nonconservative for a scenario where gross blockage of the strainer is evident and it is clear that the ECCS would be incapable of performing its specified safety function (e.g., if tarps were inadvertently left covering the sump screens following an outage). In other cases (e.g., where an administrative fiber limit is inadvertently exceeded), the 90 days may be appropriate because of conservatism in the licensing basis analysis.

Most technical specification completion times are of limited duration, making the consideration of the spectrum of scenarios that could render a structure, system or component unnecessary. For long duration completion times, however, such as the 90 days discussed above, the licensee needs to show that the completion time minimizes the level of risk to the public. The staff requests the licensee to provide an explanation of the technical basis for the 90 days, including how any currently established programs, such as the configuration risk management program, would factor into their response to an unlikely, but severe scenario discussed above.

**Lisa Regner**

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