

## SummerRAIsPEm Resource

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**From:** Gleaves, Bill  
**Sent:** Friday, January 13, 2017 2:11 PM  
**To:** Christopher Whitfield (CWHITFIE@southernco.com)  
**Cc:** Chamberlain, Amy Christine; Nick Kellenberger (nicholas.r.kellenberger@scana.com); Hoellman, Jordan; Patel, Chandu; Betancourt, Luis; Kent, Lauren; SummerRAIsPEm Resource  
**Subject:** REVISED Proposed Clarification for LAR-15-017 & LAR 13-35 (WEC52) for Vogtle 3&4 and Summer 2&3

Mr. Whitfield,

**I apologize for the inconvenience, but this email is to REVISE the previous 1.11.17 email that provided 1 clarification request. By this email, the clarifications requested of SNC (and by associated SCEG) are given below. We are still proposing to discuss these 2 clarifications at the regular weekly call on 1.19.17.**

This proposed clarification is being transmitted to you by this email with the intention that you be prepared to discuss and provide at least an oral response by public meeting/conference call on January 19, 2017.

The clarification requested is as follows:

- 1) The clarification requested is related to the effects of not having the controls and indications in the FPDS (i.e., the FPDS fails). In your December 16, 2016 "Supplement 4" response, SNC stated that if the FPDS fails, the operation of the manual hand switch would not be impacted. However, our question is how can the operators can control the equipment (e.g. open the reactor vessel head vent valves) with no indication in the DAS. The safety displays provide indication of the valve positions, but DAS does not. If the valve position is available on the normal operator Ovation workstations, then they could look at those displays to see valve position. If the valve position is not on the normal operator Ovation workstations, then someone would need to go to the remote shutdown workstation and use the non-safety display there to check valve position.
- 2) Enclosure 7 of Letter ND-16-1391 dated August 15, 2016 (ADAMS Accession No. ML16232A576), states that three design basis events were analyzed, and the analysis is provided in Enclosure 8 of the same letter. The staff observed that three distinct design basis events described in Chapter 15, "Accident Analyses," of the VEGP 3&4 UFSAR were described in Enclosure 8, and two of these events were treated as one event. Also, the staff observed that Enclosure 8 contains an evaluation of another event described in Chapter 19. Please clarify whether the event in Chapter 19 is a considered to be a design basis event or a beyond design basis event. Please revise Enclosure 7 and Enclosure 8 if necessary. Comments to Enclosure 7 are shown below:

After reviewing the DBEs analyzed in Chapter 15, Chapter 6 (Section 6.2), and Appendix 19E for the AP1000 plant design, three DBEs were identified to require operator action. The DBEs are for Anticipated Operational Occurrences. No DBEs are limiting Design Basis Accidents. For these three DBEs, the information necessary for the operator to take action is captured on the FPDS and on alternate, non-safety related sources. For two of the events, procedures provide the guidance to use the alternate information on the Diverse Actuation System (DAS) so that the operators can reliably execute their emergency operating procedures. For the third event, there is an automatically initiated actuation in PMS that provides a backup to the operator action that relies on the safety displays. There is also a procedure for manual actuation using alternate information provided by the DAS or the normal operator workstations. Therefore, the required action can still occur for all three events even if the required information is not available on the FPDS-based safety

displays. No adverse safety consequences are expected if the safety system FPDS is not available.

<END>

Billy

P.S> This email will be automatically added to added with a “publically available” ADAMS profile and released in 5 days. If anything in this clarification is deemed to be PROPRIETARY, please let me know as soon as you know.

William (Billy) Gleaves

Lead Project Manager for

V.C. Summer Units 2 and 3

Licensing Branch 4

US NRC, Office of New Reactors

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