

NRR-PMDAPEm Resource

From: Buckberg, Perry
Sent: Monday, January 23, 2017 4:17 PM
To: 'rdwells0@tva.gov'
Cc: Schaaf, Robert; Beasley, Benjamin; 'garent@tva.gov'
Subject: Request for Additional Information - Watts Bar Unit 2 SR Extension LAR - MF8869
Attachments: Draft RAIs - Watts Bar Unit 2 Surveillance Requirement extension (CAC MF8869); WB2 Final RAIs - Extend 3.0.2 SRs MF8869 EICB 1-23-2-17.docx

Russ,

By letter dated November 23, 2016, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16333A250), Tennessee Valley Authority (TVA), submitted a license amendment request (LAR) for Watts Bar Nuclear Plant, Unit 2. The LAR proposes to revise Technical Specification Surveillance Requirement (SR) 3.0.2 to extend, on a one-time basis, specific SRs that are normally performed on an 18-month frequency in conjunction with a refueling outage. Of the 52 SRs in the LAR, the staff is currently reviewing the 19 SRs represented in LAR attachments 8, 9 and 11 and has identified areas where additional information is needed to complete the review.

In the attached January 12, 2017, e-mail, the staff issued 2 draft Requests for Additional Information (RAIs) to TVA. TVA requested clarification on these draft RAIs and a phone conference between TVA and the staff was held on January 19, 2017. The attached final RAI document includes minor edits to RAI-MF8869-EICB-01 resulting from the phone conference. The NRC requests that the licensee respond to these final RAIs within 30 days of this email.

Thanks,

Perry Buckberg

Senior Project Manager

phone: (301)415-1383

perry.buckberg@nrc.gov

U.S. Nuclear Regulatory Commission

Office of Nuclear Reactor Regulation

Mail Stop O-8G9a

Washington, DC, 20555-0001

REQUEST FOR ADDITIONAL INFORMATION
WATTS BAR NUCLEAR PLANT, UNIT 2
LICENSE AMENDMENT REQUEST FOR ONE-TIME EXTENSION OF TECHNICAL
SPECIFICATION SURVEILLANCE REQUIREMENTS
GROUP 1 - LAR ATTACHMENTS 8, 10, and 11
(CAC NO. MF8869)

By letter dated November 23, 2016, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16333A250), Tennessee Valley Authority (TVA), submitted a license amendment request (LAR) for Watts Bar Nuclear Plant, Unit 2. The LAR proposes to revise Technical Specification (TS) Surveillance Requirement (SR) 3.0.2 to extend, on a one-time basis, specific SRs that are normally performed on an 18-month frequency in conjunction with a refueling outage. Of the 52 SRs in the LAR, the staff is currently reviewing the 19 SRs represented in LAR attachments 8, 9 and 11 and has identified areas where additional information is needed to complete the review.

RAI-MF8869-EICB-01

In Attachment 10 of the LAR, the licensee states that the test acceptance criteria for SR 3.3.3.3 Function 11 require that the open and closed positions of the Containment Isolation Valves are correctly indicated in the main control room as compared to the local position of the valve. The licensee cited SR 3.3.3.1 and In-Service Testing (IST) as providing an alternate means of partially satisfying the SR 3.3.3.3, and as justification for allowing the interval extension. SR 3.3.3.1 requires a monthly Channel Check to be performed for each required Post Accident Monitoring (PAM) instrumentation channel to identify deviations between redundant parameters. The IST verifies the Containment Isolation Valve (CIV) position, but does not require local verification of valve position. Attachment 10 of the LAR identifies 34 valves for which the one-time extension of SR 3.3.3.3, Function 11 is applicable:

- a. Please describe the process for conducting a monthly Channel Check of the valves. Specifically, describe what features or functions are being "checked" and describe how such information is used in providing assurance of operability of the valve position indication functions.
- b. Please identify if any of the 34 CIVs identified for Function 11 have previously failed SR 3.3.3.1 or the IST tests.
- c. Please describe the operational, administrative, and corrective actions to be taken if any CIV fails SR 3.3.3.1 or an IST.
- d. Please augment the Table in Attachment 10 to indicate which surveillances or ISTs are performed on each valve, the dates such surveillances or ISTs were performed for each valve and the frequency of the ISTs for each valve. Additionally, please document any adverse findings and corrective actions taken as a result of such surveillances or ISTs.
- e. Please describe what functions are tested and what acceptance criteria are applied during an 18-month local leak rate test (LLRT) versus the functions tested and acceptance criteria applied during an in-service test (IST).

RAI-MF8869-EICB-02

In Attachment 11 of the LAR the licensee identified SR 3.3.4.3, and Power Ascension Testing (PAT), as providing alternate means of partially satisfying SR 3.3.4.2. SR 3.3.4.3 requires a

channel calibration for each instrumentation channel. PAT demonstrated that the unit could be taken to and maintained in hot standby from outside the control room while at 30% power.

However the licensee does not describe when SR 3.3.4.3 was last performed for TS Table 3.3.4-1 Functions 3.b, 4.b, and 5.a.

- a. Please identify when SR 3.3.4.3 was last successfully performed for TS Table 3.3.4-1 functions 3.b, 4.b, and 5.a. If available, please provide a summary of Unit 1 calibration as-found data for SR 3.3.4.3 functions 2.b, 2.c, 3.b, 4.b, 4.c, and 5.a.
- b. In Attachment 11 of the LAR, the licensee stated that for function 4.e, the T_{sat} loops are shared with the steam generator (SG) pressure loop; with the auxiliary control room (ACR) indicators having both pressure and saturation temperature on each indicator. In order to understand if the potential for drift exists in the T_{sat} indicator for SR 3.3.4.3 function 4.e, please provide a description of the device(s) used to indicate T_{sat} using the signal from the steam generator pressure transmitters.
- c. In Attachment 11 of the LAR, the licensee stated that the pressure indicators are monitored monthly for deviations with a maximum channel deviation of 50 psig between the main control room and ACR instrumentation to allow for early identification of a failing component. Please describe how the 50 psig value was derived as a deviation limit between channels, and how that compares to the instrument tolerance. Also, as part of your response, please provide the procedural instrument as-found and as-left tolerances.

Buckberg, Perry

From: Buckberg, Perry
Sent: Thursday, January 12, 2017 3:49 PM
To: 'garent@tva.gov'; 'rdwells0@tva.gov'
Cc: Schaaf, Robert; Beasley, Benjamin; 'cedmonson@tva.gov'
Subject: Draft RAIs - Watts Bar Unit 2 Surveillance Requirement extension (CAC MF8869)
Attachments: WB2 Draft RAIs - Extend 3.0.2 SRs EICB.docx

Gentlemen,

Attached are draft Requests for Additional Information regarding the Watts Bar Unit 2 Surveillance Requirement extension license amendment request that was submitted 11/23/2016.

Please review to ensure that there is no proprietary or security related information contained in the RAIs, that the questions are understandable, that the regulatory basis is clear and to determine if the information was previously docketed. Please let me know by CoB 1/19/2017 if a clarification phone call is needed.

Please contact me with any questions.

Thanks,

Perry Buckberg

Senior Project Manager

phone: (301)415-1383

perry.buckberg@nrc.gov

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REQUEST FOR ADDITIONAL INFORMATION
WATTS BAR NUCLEAR PLANT, UNIT 2
LICENSE AMENDMENT REQUEST FOR ONE-TIME EXTENSION OF TECHNICAL
SPECIFICATION SURVEILLANCE REQUIREMENTS
GROUP 1 - LAR ATTACHMENTS 8, 10, and 11
(CAC NO. MF8869)

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RAI-MF8966-EICB-01

In Attachment 10 of the LAR, the licensee states that the test acceptance criteria for SR 3.3.3.3 Function 11 require that the open and closed positions of the Containment Isolation Valves are correctly indicated in the main control room as compared to the local position of the valve. The licensee cited SR 3.3.3.1 and In-Service Testing (IST) as providing an alternate means of partially satisfying the SR 3.3.3.3, and as justification for allowing the interval extension. SR 3.3.3.1 requires a monthly Channel Check to be performed for each required Post Accident Monitoring (PAM) instrumentation channel to identify deviations between redundant parameters. The IST verifies the Containment Isolation Valve (CIV) position, but does not require local verification of valve position. Attachment 10 of the LAR identifies 34 valves for which the one-time extension of SR 3.3.3.3, Function 11 is applicable:

- a. Please describe the process for obtaining valve position information during a monthly Channel Check and provide an example description of how such information will be used to verify that the open and closed positions of the valves are correctly indicated in the main control room as compared to the local position of the valve. Alternatively, please identify what surveillance process will be used to ensure the lines penetrating the containment can be isolated.
- b. Please identify if any of the 34 CIVs identified for Function 11 have previously failed SR 3.3.3.1 or the IST tests.
- c. Please describe the corrective actions to be taken if one or more CIV fails SR 3.3.3.1.
- d. Please identify the frequency in which IST is performed for each of the 34 CIVs affected by the one-time surveillance extension.
- e. Local verification of valve position is not performed for the CIVs which only credit the IST as an alternate means of partially satisfying SR 3.3.3.3. Please describe how a closed valve (per control room indication) is verified to be fully seated.

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RAI-MF8966-EICB-02

In Attachment 11 of the LAR the licensee identified SR 3.3.4.3, and Power Ascension Testing (PAT), as providing alternate means of partially satisfying SR 3.3.4.2. SR 3.3.4.3 requires a channel calibration for each instrumentation channel. PAT demonstrated that the unit could be taken to and maintained in hot standby from outside the control room while at 30% power.

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DRAFT