

NRR-PMDAPEm Resource

From: Hon, Andrew
Sent: Friday, February 03, 2017 2:54 PM
To: Murray, William R. (Bill) (Bill.Murray@duke-energy.com) (Bill.Murray@duke-energy.com)
Subject: Brunswick Unit 1 and Unit 2 Request for Additional Information related to LAR to modify the TS requirements for end states associated with the implementation of the approved TSTF traveler TSTF-423-A CAC NOS. MF8466 and MF8467)

In a letter dated September 28, 2016, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16287A415), Duke Energy Progress (the licensee) requested the subject amendment to Operating Licenses DPR-71 and DPR-62.

The U.S. Nuclear Regulatory Commission (NRC) staff is reviewing your submittal and has determined that additional information is required to complete the review. The specific information requested is listed below. The proposed questions were discussed with your staff on January 25, 2017. Your staff confirmed that the request for additional information (RAI) was understood and did not include proprietary or security-related information, and agreed to provide a response in 60 days.

The NRC staff considers that timely responses to RAIs help ensure sufficient time is available for staff review and contribute toward the NRC's goal of efficient and effective use of staff resources. Please note that if you do not respond to this request by the agreed-upon date or provide an acceptable alternate date, we may deny your application for amendment under the provisions of Title 10 of the *Code of Federal Regulations*, Section 2.108. If circumstances result in the need to revise the agreed upon response date, please contact me.

Background for RAI #1

While working on similar applications, the NRC staff had earlier noticed that a regulatory guidance document used in the staff's regulatory assessments for the end-states related TSTFs and referenced in the staff's model SEs for such TSTFs, had been superseded and therefore, is not valid guidance for the adoption of the staff's approved TSTFs. The issue concerns the reference to Regulatory Guide (RG) 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants," (ADAMS Accession No. ML003699426) in TSTF-423, Revision 1 (ADAMS Accession No. ML093570241) as well as model safety evaluation (ADAMS Accession No. ML120200384) for the TSTF, which states,

"RG 1.182, "Assessing and Managing Risk before Maintenance Activities at Nuclear Power Plants" (Reference 6), provides guidance on implementing the provisions of 10 CFR 50.65(a)(4) by endorsing a revised Section 11 to NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants" (Reference 7)."

On November 27, 2012, via Federal Register Notice 78 FR 70846, the NRC staff informed the industry that RG 1.182 had been withdrawn by the staff since it was determined that the document (RG 1.182) was redundant due to the inclusion of its subject matter in Revision 3 of RG 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." The Notice also stated that withdrawal of RG 1.182 neither altered any prior or existing licensing commitments based on its use, nor constituted backfitting as defined in Title 10 of the Code of Federal Regulations (10 CFR) 50.109 (the Backfit Rule) and was not otherwise inconsistent with the issue finality provisions in 10 CFR, Part 52. In addition, the NRC staff observed that RG 1.160 endorsed Revision 4A of the Nuclear Management and Resources Council (NUMARC) 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." NUMARC 93-01 provides methods that are acceptable to the NRC staff for complying with the provisions of Section 50.65, "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," of Title 10, of the Code of Federal

Regulations, Part 50, "Domestic Licensing of Production and Utilization Facilities" (10 CFR Part 50) (Ref. 2). The model SE for the TSTF refers to the guidance in NUMARC 93-01, Section 11, "Assessment of Risk Resulting from Performance of Maintenance Activities," dated February 22, 2000 (ADAMS Accession No. ML003704489).

RAI #1:

In order to justify adoption of the approved TSTF changes, please confirm that Brunswick's current licensing basis adheres to the RG 1.160 guidance and contains a commitment to the updated version of NUMARC 93-01. (For details, you may also refer to the NRC staff's letter dated, February 26, 2015 (ADAMS Accession No. ML15033A152), in response to the TSTF Group's letter, dated, September 16, 2014 (ADAMS Accession No. ML14259A575), on the subject matter.)

Background for RAI #2:

Regarding the licensee's proposed change to LCO 3.5.1, "ECCS – Operating," the licensee's variation/deviation #3 in its application, states:

Condition C of BSEP TS 3.5.1 is proposed to be revised per TSTF-423; however, it applies when Conditions A or B are not met. Conditions in BSEP TS 3.5.1 are numbered differently from the Standard TS Conditions.

It further states:

Condition A of the Standard TS and Condition A of the BSEP TS 3.5.1 are equivalent. BSEP TS 3.5.1 includes Condition B for one Low Pressure Coolant Injection (LPCI) pump and one Core Spray (CS) subsystem inoperable concurrently. The justification provided in the topical report and model Safety Evaluation for this change is also applicable to Condition B of the BSEP TS 3.5.1.

The proposed change to Condition A of BSEP TS 3.5.1 appeared to be equivalent to that of end state change specified for Condition A of the Standard TS 3.5.1. However, for Condition B regarding inoperability of one Low Pressure Coolant Injection (LPCI) pump and one Core Spray (CS) subsystem, the proposed change does not appear to be in accordance with the approved Technical Specifications Task Force (TSTF) Traveler TSTF-423, Revision 1, i.e. the justification provided in the topical report and model Safety Evaluation for this change does not appear to be applicable to Condition B of the BSEP TS 3.5.1. Thus, the NRC staff considers the proposed change beyond the scope of the approved TSTF.

RAI #2:

Please provide Emergency Core Cooling Systems (ECCS) analysis and containment analysis and results to verify acceptable ECCS performance, containment integrity, Environmental Equipment Qualification (EEQ), and containment heat removal for a design basis Loss of Coolant Accident (LOCA) in Mode 3 when one LPCI pump and one CS pump are concurrently inoperable in this mode.

Docket Nos. 50-324 and 50-325

Distribution: Listserv, Brunswick Unit No.1 and 2

Andy Hon, PE

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