

Vogle PEmails

From: Gleaves, Bill
Sent: Wednesday, December 13, 2017 12:07 PM
To: Vogle PEmails
Cc: Gleaves, Bill
Subject: Vogle Units 3&4 - LAR-17-010 Additional Information to Supplement the December 1, 2017 Supplement 4

From: Chamberlain, Amy Christine [mailto:ACCHAMBE@southernco.com]
Sent: Monday, December 11, 2017 1:12 PM
To: Dixon-Herrity, Jennifer <Jennifer.Dixon-Herrity@nrc.gov>
Cc: Gleaves, Bill <Bill.Gleaves@nrc.gov>; Grant, Eddie <X2EDGRAN@SOUTHERNCO.COM>
Subject: RE: Question regarding your 12.1.17 LAR-17-010 Response

Hi Jennifer,

To follow up on our phone call from this morning and the question below. Based on the physical arrangement of the system, the system components, and the flooding scenario described in the LAR, there would be no breach of the WGS system to allow moisture incursion into the system. There is no controlled valve that allows a bypass of the WGS Charcoal Delay beds, and the valve which isolates the normal system release (post-delay bed) is both (a) fail closed and (b) controlled to close on a high-high radiation signal (WGS-PL-V051, non-safety valve). We are not postulating flooding of PLS cabinets, so a spurious control signal is not postulated as a consequence of this event. There are no other valves that could cause a spurious release due to the flooding described in the LAR.

Amy Chamberlain, P.E.

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From: Gleaves, Bill [mailto:Bill.Gleaves@nrc.gov]
Sent: Tuesday, December 5, 2017 12:13 PM
To: Chamberlain, Amy Christine <ACCHAMBE@southernco.com>
Cc: Dixon-Herrity, Jennifer <Jennifer.Dixon-Herrity@nrc.gov>; Stutzcage, Edward <Edward.Stutzcage@nrc.gov>; Burkhardt, Lawrence <Lawrence.Burkhardt@nrc.gov>; Lavera, Ronald <Ronald.LaVera@nrc.gov>; Eddie Grant <x2egran@southernco.com> <x2egran@southernco.com>
Subject: Question regarding your 12.1.17 LAR-17-010 Response

Amy,

Our concern has not changed...it has always been about the potential for radioactive gas release due to the submergence of the system (a scenario for which the system was not designed). We stated that in the call two weeks ago and believed it to be clear in the RAI. Although it may have been discussed, the NRC was not making any assumption about the specific scenario that you should address, e.g., the pressure of the gaseous waste system in comparison to the pressure due to the depth of the flood water. We discussed water infiltration – yes – but this could be water infiltrating a control system or motor operated valve that could cause

the system to malfunction and perhaps release gases to the ventilation system or environment. We asked how submergence of these systems could adversely affect its function and could there be a release.

We talked about physical integrity of the system OR other system of component failure mechanisms that may lead to a release. SNC addressed the physical integrity part but not how the system could fail that could result in a release.

So we believe that the concern is the same as expressed in the RAI.

“Please provide additional information to enable the staff to reach a reasonable assurance finding that the worst case flooding will not result in a significant release from the gaseous waste management system. The charcoal guard bed and delay beds are located in Room 12153, which are on the bottom floor of the building. Table 2 in response to Question 7.a indicates 168" of flooding in that room. The concern is that potentially the water could damage the system or the beds or that water could infiltrate the beds and cause them to loose there adsorption ability, resulting in a significant release of the content of the beds (physical integrity of the rad waste system or other system or component failure mechanisms that may lead to a significant release of gaseous activity, etc.).”

We believe that SNC did not provide sufficient information about completely evaluating if and how submergence of the gaseous waste management system could result in a release of gaseous radioactivity.

If the SNC cannot provide reasonable assurance that the flooding will not result in a release from the gaseous waste management system, then SNC should document the results of its evaluation of the dose consequences and acceptance criteria for a release of radioactive material.

Billy

William (Billy) Gleaves

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December 1, 2017 Supplement 4
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"Vogtle PEmails" <Vogtle.PEmails@nrc.gov>
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