

## **NRR-DMPSPeM Resource**

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**From:** Chawla, Mahesh  
**Sent:** Tuesday, February 06, 2018 9:18 AM  
**To:** Davis, J.Michael (J.Michael.Davis@nexteraenergy.com);  
laura.swenzinski@nexteraenergy.com; Murrell, Bob (Bob.Murrell@nexteraenergy.com);  
'Weaver, Tracy'; 'Probst, Jim'  
**Cc:** Catron, Steve (Steve.Catron@fpl.com); Kilby, Gary  
**Subject:** Draft Request for Additional Information - Duane Arnold Energy Center (DAEC) -  
License Amendment Request (TSCR-170), Revision to Technical Specification 3.5.1,  
ECCS-Operating - EPID L-2017-LLA-0288

Dear Mr. Davis:

By letter dated September 5, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17248A284), NextEra Energy Duane Arnold, LLC (NextEra), the licensee for Duane Arnold Energy Center (DAEC), has requested an amendment to DAEC Technical Specifications (TS). The proposed amendment would revise the DAEC TS 3.5.1, "ECCS - Operating" to decrease the nitrogen supply requirement for the Automatic Depressurization System (ADS) in Surveillance Requirement (SR) 3.5.1.3 from 100 days to 30 days. The U.S. Nuclear Regulatory Commission staff has reviewed the licensee's submittal and determined that additional information is required in order to complete the review.

### **REQUEST FOR ADDITIONAL INFORMATION (RAI)**

#### **RAI – 1**

**Regulatory Basis:** 10 CFR Part 50.36 "Technical specifications," establishes the surveillance requirements related to the content of the TS.

10 CFR Part 50.46, "Acceptance criteria for emergency core cooling systems for light-water nuclear power reactors," requires an ECCS system that meets the criteria in 10 CFR 50.46(b) for cooling performance following a LOCA.

It was stated in Section 2.3 of the license amendment request (LAR),

Review of the DAEC accident analyses has shown that the worst-case DAEC accident scenario will require the use of ADS for 3 days post-accident. Reducing the duration of time from 100 days to 30 days still provides ample conservatism for the DAEC accident analyses and allows for an increase in accumulator margin.

Please provide the following additional information:

- a) Describe the worst-case event, including the number of times the valves are required to cycle open over the 3 day post-accident period, and whether the ADS valves have adequate capacity available to cycle during that period.
- b) Confirm that the capacity to cycle the ADS valves open at least five times at design pressures will still remain available during the proposed 30 days period, as stated in NUREG-0737, "Clarification of TMI Action Plan Requirements," Item II.K.3.28, "Verify Qualifications of Accumulators on Automatic Depressurization System Valves."

***Please arrange a teleconference with the NRC staff to discuss the above information. Thanks***

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