

Vogtle PEmails

From: Gleaves, Bill
Sent: Friday, February 23, 2018 7:53 AM
To: Chamberlain, Amy Christine; Vogtle PEmails
Cc: Adam Quarles (AGQUARLE@southernco.com); Mitchell, Matthew; Terry, Leslie; Makar, Gregory; Patel, Chandu; Dixon-Herrity, Jennifer
Subject: Draft RAI #1 for LAR-17-039, "Unqualified Service Level 1 Coatings Program"
Attachments: Vogtle LAR-17-039 Unqualified Service Level 1 Coatings Program Draft RAI No1 2Qs.pdf

Ms. Chamberlain,

This draft RAI is designated "RAI #1" and contains 2 draft Questions related to your LAR-17-039, "Unqualified Service Level 1 Coatings Program."

We typically expect that the RAI response will be 1 month after the draft RAI is accepted by SNC as "final." In addition, the staff will not be able to complete the review approximately 1 month after receipt of an acceptable response or supplement. If the change is needed sooner than that date to support construction, please consider submitting a request for a PAR.

We do not believe that there is SUNSI information in this draft RAI, however, if we are incorrect please let me know immediately. If there is SUNSI information in the RAI response, please so state in the response letter and mark appropriately.

We will be available to support a meeting or conference call on this topic if desired.

Respectfully,

Billy

William (Billy) Gleaves
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Subject: Draft RAI #1 for LAR-17-039, "Unqualified Service Level 1 Coatings Program"
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Received Date: 2/23/2018 7:53:29 AM
From: Gleaves, Bill

Created By: Bill.Gleaves@nrc.gov

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Tracking Status: None
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Options

Priority: Standard
Return Notification: No
Reply Requested: No
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Vogtle Units 3 & 4
LAR-17-039, "Unqualified Service Level 1 Coatings Program"
Draft Request for Additional Information
February 23, 2018

Regulatory Bases for Request for Additional Information

The NRC staff have reviewed and evaluated the information provided by SNC for this LAR, and has determined that the following information is needed in order to complete its review of the request. The information is needed to determine if the proposed allowance of unqualified IOZ inside containment will meet Part 50 of Title 10 of the *Code of Federal Regulations* (10 CFR), Appendix A, General Design Criteria 1, 4, 35, and 38, and 10 CFR 50.46, as they relate to the effects of debris on the operation of the emergency core cooling system and long-term core cooling.

RAI 1, Question 1

The NRC staff is unclear on the scope of the request, therefore, please address the following regarding nonconforming coatings and Service Level I epoxy coatings:

- a. The request proposes to add the following paragraph to the end of Subsection 6.1.2.1.5 in Tier 2 of the Updated Final Safety Analysis Report (UFSAR): "Nonconforming coatings that cannot be qualified as Service Level I are evaluated on a case basis relative to impact on plant safety. The total inventory of unqualified coatings (coatings which cannot be qualified as Safety-Service Level I) within Service Level I areas combined with the total amount of coating debris fines that can be generated by a LOCA [loss of coolant accident] jet is restricted to the limits established in Subsection 6.3.2.2.7.1." It is the NRC staff's understanding that the proposed amendment is for coatings that could have been qualified as Service Level I but qualification cannot be verified. If the request is for more than coatings that could have been qualified as Service Level I but whose qualification could not be verified, please provide examples so that the NRC staff can fully understand the scope of this request.
- b. Please explain the applicability of this request to any epoxy coatings designated as Service Level I. The request appears to consider only IOZ, but the proposed changes to Tier 2 of the UFSAR are not limited to IOZ. For example, the proposed text for Subsection 6.1.2.1.5 in Tier 2 of the UFSAR seems to apply to all Service Level I coatings and does not suggest that it applies only to IOZ coatings that are not qualified as Service Level I. If the absence of Service Level I epoxy is a result of differences between VEGP, Units 3 and 4, and the AP1000 certified design, please identify and explain those differences.

RAI 1, Question 2

The LAR proposes to add a sentence regarding the monitoring of unqualified coatings inside containment to the fifth paragraph of Subsection 6.1.2.1.6 in Tier 2 of the UFSAR. It is unclear to the NRC staff if the reference to American Society for Testing and Materials (ASTM) "ASTM D7491" is referring to "ASTM D 7491-08," or if it is referring to a different version or what is meant by the non-specific reference.

DRAFT