

## **Vogle PEmails**

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**From:** Kallan, Paul  
**Sent:** Wednesday, March 07, 2018 12:41 PM  
**To:** Vogle PEmails  
**Subject:** Draft RAI for LAR 18-005  
**Attachments:** Drat RAI for Vogle 3-4 LAR 18-005.docx

**Hearing Identifier:** Vogtle\_COL\_Docs\_Public  
**Email Number:** 233

**Mail Envelope Properties** (CY1PR09MB098737AA602CD3D86192BE30F6D80)

**Subject:** Draft RAI for LAR 18-005  
**Sent Date:** 3/7/2018 12:40:39 PM  
**Received Date:** 3/7/2018 12:40:42 PM  
**From:** Kallan, Paul

**Created By:** Paul.Kallan@nrc.gov

**Recipients:**  
"Vogtle PEmails" <Vogtle.PEmails@nrc.gov>  
Tracking Status: None

**Post Office:** CY1PR09MB0987.namprd09.prod.outlook.com

Files	Size	Date & Time
MESSAGE	3	3/7/2018 12:40:42 PM
Draft RAI for Vogtle 3-4 LAR 18-005.docx		19792

**Options**  
**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
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## Draft RAI for LAR 18-005

The Code of Federal Regulations, 10 CFR 50.36(c)(2)(i) states that technical specification (TS) limiting conditions for operation (LCOs) are the lowest functional capability or performance levels of equipment required for safe operation of the plant. It further requires that when an LCO is not met the licensee shall shut down the reactor or follow any remedial action permitted by the technical specification until the condition can be met. In addition, TS are required to include surveillance requirements, in accordance with 10 CFR 50.36(c)(3) which states that, "surveillance requirements are requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met."

In LAR 18-005, notes are proposed to be added to SR 3.1.4.1 and SR 3.1.7.1. It proposes to revise SR 3.1.4.1 with a "corollary" note, reading "Not required to be performed for rods associated with inoperable DRPI or demand position indication," and to revise SR 3.1.7.1 to add a note, reading, "Not required to be met for DRPI associated with a rod that does not meet LCO 3.1.4, Rod Alignment Limits." These notes are not needed for the following reasons:

- 1) Surveillances do not have to be performed on inoperable equipment in accordance with SR 3.01, therefore the notes are not necessary;
- 2) The notes may imply that the LCOs are otherwise met and therefore the appropriate Conditions do not have to be entered; this is not the case, the appropriate Conditions need to be entered and the associated remedial actions need to be taken.

Additional clarification is requested for why these notes are needed or request that the proposed notes be removed.