

## Vogle PEmails

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**From:** Habib, Donald  
**Sent:** Tuesday, March 13, 2018 1:28 PM  
**To:** WASPARKM@southernco.com; ptapscot@southernco.com; Chamberlain, Amy Christine; neil.haggerty@excelservices.com; Thomas, Corey (SNC)  
**Cc:** Dixon-Herrity, Jennifer; Patel, Chandu; Ashley, Clinton; Cranston, Gregory; Vogtle PEmails  
**Subject:** Discussion Topics for Vogtle Units 3 and 4, 3/15/18 Public Meeting (LAR 17-037, Tier 2\* Departure Process)

Wes et al. –

Below are discussion topics for the upcoming public meeting on 3/15/18. These topics pertain to LAR 17-037 Qualifying Criterion 4, “Adversely affects the debris screen design criteria,” which was based upon 10 CFR Part 52 Appendix D, Paragraph VIII.B.6.b(7), “Screen design criteria.”

Please contact me if you have any questions.

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- Regarding VIII.B.6.b(7), “Screen design criteria,” the analysis summary provided in LAR Enclosure 5 states “Paragraph VIII.B.5 may not work well in all cases..”
  - What is meant by “Paragraph VIII.B.5 may not work well in all cases”? An example would be helpful.
- LAR Enclosure 1, page 12 of 19, provides detailed guidance for Qualifying Criterion 4. The detailed guidance consists of two parts:
  1. An adverse change is any change that would be considered a non-conservative change of a debris value established in the UFSAR;
  2. An adverse change would be any change that changes any element of the evaluations used to determine the design of the debris screens.
    - Explain how the detailed guidance was developed and why these **two** items are sufficient to assess whether a change is adverse in this safety significant area. Will the detailed guidance be incorporated into a procedure upon LAR approval?
    - For item 1,
      - What debris values established in the UFSAR are subject to Qualifying Criterion 4?
      - What would be considered a non-conservative change of a debris value?
      - What would be considered a conservative change of a debris value?
      - Explain whether an increase or decrease in a debris value established in the UFSAR “would be considered a non-conservative change of a debris value established in the UFSAR” that would result in assessing the change as adverse.
    - For item 2,
      - What debris screens are subject to this criterion?
      - What is considered to be an element of the evaluations used to determine the design of the debris screens?

- Explain whether a decrease or increase in strainer area (frontal face or screen surface) “would be considered a change to an element of the evaluations used to determine the design of the debris screens” that would result in assessing the change as adverse.
  - Explain whether an increase or decrease in strainer mesh size “would be considered a change to an element of the evaluations used to determine the design of the debris screens” that would result in assessing the change as adverse.
  - Explain how changes to information associated with VIII.B.6.b item 7 contained in UFSAR section 6.3.2.2.7.1 (e.g., ZOI and use of MRI) would be assessed by this new process. Are these items considered to be an element of the evaluations used to determine the design of the debris screens?
- The CFR refers to “screen design criteria.” The LAR refers to “...debris screen design criteria” (Qualifying Criterion 4).
    1. Please explain why the word “debris” was added in the LAR description.
    2. Detailed guidance (discussed above) refers to debris values and design of debris screens. However Qualifying Criteria 4 appears to be limited to “debris screen design.” Why the difference? Should Qualifying Criteria 4 be updated to reflect these two areas (debris values and design of debris screens) that are expressed in the detailed guidance?
  - LAR Enclosure 6 provides an example where a Tier 2\* departure would not require prior NRC approval. In answering the question posed by Qualifying Criterion 4 (adversely affects the debris screen design criteria?), the LAR states that Qualifying Criterion 4 poses a question “regarding impacts... to the PXS recirculation screen design.” Qualifying criterion 4 is more than just impacts to PXS recirculation screen design. It is also about debris values. Therefore, based on the “reviewers aid” provided in LAR Enclosure 6, if the process was applied as shown, could it lead to an unacceptable outcome?

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**From:** Habib, Donald

**Sent:** Monday, March 12, 2018 10:34 AM

**To:** 'WASPARKM@southernco.com' <WASPARKM@southernco.com>; 'ptapscot@southernco.com' <ptapscot@southernco.com>; 'Chamberlain, Amy Christine' <ACCHAMBE@southernco.com>; 'neil.haggerty@excelservices.com' <neil.haggerty@excelservices.com>; 'Thomas, Corey (SNC)' <BRCThoma@southernco.com>

**Subject:** Update on LAR 17-037 (Tier 2\* Departure Process)

Wes et al. –

This is just a heads-up that I expect to have a staff question ready to send to you in the next day or two, pertaining to this LAR, for discussion at the public teleconference this Thursday. The question(s) relate to criterion #4.

Thanks  
Don

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