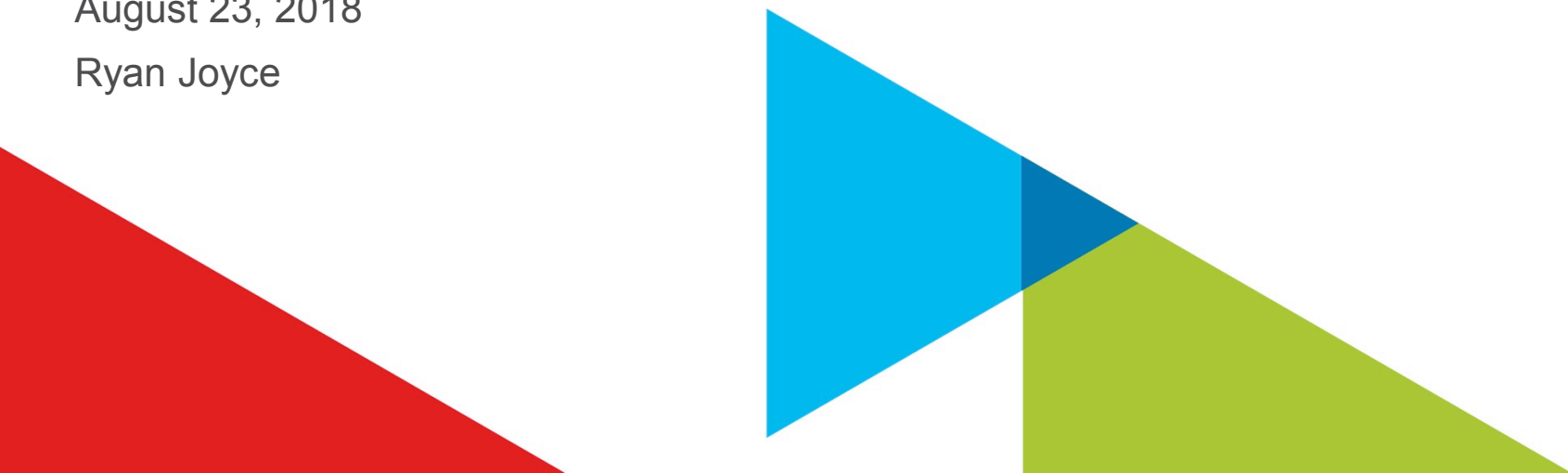


NRC-Pre Submittal Meeting

TSTF-51 for Hatch and TSTF-51 and -471 for Farley

August 23, 2018

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Agenda Items



1. Introductions
2. Meeting Kick-off
3. Purpose for the License Amendment Request
4. Overview of the Hatch (HNP) and Farley (FNP) Offsite and Control Room Dose Analyses
5. License Amendment Request Content

Purpose for the License Amendment Request

Purpose of License Amendment Request (LAR)



- Southern Nuclear (SNC) intends submit a LAR to adopt Technical Specification Task Force (TSTF)-51 in the Fall 2018 for Hatch Units 1&2
- SNC intends submit a LAR to adopt TSTF-51 and -471 in the Fall 2018 for Farley Units 1&2.
- Vogtle Units 1&2 are currently under evaluation.

Background



- By letter dated November 7, 2013 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML13246A358), the U.S. Nuclear Regulatory Commission (NRC) staff identified potential operating issues with the continued adoption of TSTF-51, TSTF-286, and TSTF-471 (which have already been incorporated into the Standard Technical Specifications (NUREG-1430 to 1434) related to core monitoring instrumentation and dose consequences. It was suggested in this 2013 letter that licensees not submit amendments to adopt these three Travelers until a final resolution was achieved.
- Per NRC/TSTF discussion (refer to draft letter ADAMS Accession No. ML18221A561), the NRC is prepared to rescind the request from the 2013 letter and resume receiving LARs associated with adoption of TSTF-51 and TSTF-471.

TSTF-51



- Removes certain Technical Specification (TS) requirements for engineering safety features (ESF) (e.g., primary/secondary containment, standby gas treatment (SGT), isolation capability) to be Operable when moving irradiated fuel after sufficient radioactive decay has occurred, provided off-site doses and control room doses remain below the NUREG-0800 (SRP) limits and 10 CFR 50.67 limits.
 - TS will continue to be applicable for fuel movement prior to the amount of decay occurring.
- Associated with this change is the deletion of Operability requirements during Core Alterations for certain ESF mitigation features.

TSTF-471



Removes additional requirements related to Core Alterations which were overlooked in TSTF-51. FNP plans to adopt applicable portions of TSTF-471.

TSTF-471 does not apply to HNP (BWR), which still contains a few instances of the use of Core Alterations.

Overview of the HNP and FNP FHA Analyses of Record

HNP Fuel Handling Accident (FHA) Analysis of Record (AOR)



- Utilizes Alternate Source Term (AST) – assumes a decay period of 24 hours
- Runs two cases –
 - Case 1 - Credits SGT system and secondary containment Operable.
 - Case 2 – No credit taken for filtration or holdup in secondary containment
- 2006-2008 Full NRC review of atmospheric dispersion analysis and FHA dose analysis to approve full scope implementation of AST at HNP
- LAR Enclosure will provide a discussion of differences between FHA analysis revision previously review by the NRC and the current FHA AOR

FNP FHA AOR



- Utilizes AST – evaluates decay periods of 70, 80, 90, and 100 hours
- Four cases –
 - Open Personnel Airlock; Open containment hatch
 - Closed Personnel Airlock; Open containment hatch
 - Open Personnel Airlock; Closed containment hatch
 - SFP Area
- 2016-2017 Full NRC review of Atmospheric Dispersion analysis and FHA dose analysis to approve full scope implementation of AST at FNP and support TSTF-448 - Control Room Habitability.

FNP FHA AOR



- LAR Enclosure will provide a discussion of any technical differences between FHA analysis revision previously review by the NRC (Enclosures 5 and 7 of AST LAR) and the current FHA AOR
- Doses provided in LAR Enclosure will assume a decay time of 70 hours instead of 100 hours provided in the AST LAR.

License Amendment Request Content

License Amendment Request Content



A separate LAR is planned for HNP and FNP.

Each LAR will consist of:

- Enclosure: Basis for Proposed Change
 - Attachment 1: Marked-up TS Pages
 - Attachment 2: Clean typed TS Pages
 - Attachment 3: Marked-up TS Bases pages (For Information Only)

License Amendment Request Content



Enclosure: Basis for Proposed Change

- TS changes and deviations from TSTFs
- Fuel Handling Accident (FHA) Accident Source Term (AST) analysis discussion
 - Summary discussion on confirmation that the proposed changes in TSTF-51 and/or TSTF-471 will not cause the resultant radiological doses at the onsite and offsite boundaries from dropping a load during core alterations to exceed those recorded in the FHAAOR, taking into account only those safety systems required to be Operable by the proposed TSs.
 - FNP and HNP also intend to provide a discussion providing confirmation that the length of time defined as "recently" is less than the time required to remove the reactor vessel head and internals and expose the irradiated fuel after a shutdown.

Proposed HNP Deviations for TSTF-51



Because the FHA continues to credit the main control room emergency ventilation system (MCREV), the following TSs are not being modified:

- LCO 3.7.4 – MCREC System – (instrumentation is modified because FHA assumes manual actuation of MCREV)
- LCO 3.7.5 – Control Room AC
- LCO 3.8.2 – AC Sources Shutdown
- LCO 3.8.5 – DC Sources Shutdown
- LCO 3.8.8 – Dist. Syst. Shutdown

Proposed FNP Deviations for TSTF-51



Because the FHA continues to credit the control room emergency filtration (CREF) and penetration room filtration (PRF) systems, the following TSs are not being modified:

- LCO 3.3.7 – CREFS Actuation Instrumentation – only automatic actuation. Applicability for manual channels will remain the same
- LCO 3.3.8 – PRF Instrumentation – only automatic actuation. Applicability for manual channels will remain the same
- LCO 3.7.10 – Control Room
- LCO 3.7.11 – CRACS
- LCO 3.7.12 – PRF System
- LCO 3.8.2 – AC Sources Shutdown
- LCO 3.8.5 – DC Sources Shutdown
- LCO 3.8.8 – Inverters Shutdown
- LCO 3.8.10 – Dist. Syst. Shutdown



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