

NRR-DMPSPeM Resource

From: Galvin, Dennis
Sent: Thursday, January 10, 2019 1:03 PM
To: Arthur.Zaremba@duke-energy.com
Cc: Mark Turkal (Mark.Turkal@duke-energy.com); Grzeck, Lee (Lee.Grzeck@duke-energy.com)
Subject: Brunswick RAIs – LAR to Revise TSs to Adopt TSTF-439, "Eliminate Second Completion Times Limiting Time From Discovery of Failure To Meet an LCO" (EPID L 2018-LLA-0220)
Attachments: Brunswick TSTF-439 Final RAI 2019-01-10 L-2018-LLA-0220.pdf

Mr. Zaremba,

By letter dated August 14, 2018 (Agencywide Documents Access and Management System Accession No. ML18227A535), Duke Energy Progress, LLC (the licensee) submitted a license amendment request (LAR) for Brunswick Steam Electric Plant Unit Nos. 1 and 2 (Brunswick). The proposed amendments would modify the Brunswick Technical Specifications (TSs) to adopt TSTF-439, "Eliminate Second Completion Times Limiting Time from Discovery of Failure to Meet an LCO [limiting condition for operation]."

The U.S. Nuclear Regulatory Commission (NRC) staff has determined that additional information is needed to complete its review. The enclosed RAI was e-mailed to the licensee in draft form on December 21, 2018 (ADAMS Accession No. ML18360A036). A clarification call was held on January 10, 2019. The licensee agreed to provide responses to the RAI by February 11, 2019. The NRC staff agreed with this date.

If you have any questions, please contact me at (301) 415-6256.

Respectfully,

Dennis Galvin
Project Manager
U.S Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Division of Operating Reactor Licensing
Licensing Project Branch 2-2
301-415-6256

Docket No. 50-325, 50-324

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Created By: Dennis.Galvin@nrc.gov

Recipients:

"Mark Turkal (Mark.Turkal@duke-energy.com)" <Mark.Turkal@duke-energy.com>
Tracking Status: None
"Grzeck, Lee (Lee.Grzeck@duke-energy.com)" <Lee.Grzeck@duke-energy.com>
Tracking Status: None
"Arthur.Zaremba@duke-energy.com" <Arthur.Zaremba@duke-energy.com>
Tracking Status: None

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REQUEST FOR ADDITIONAL INFORMATION
RELATED TO LICENSE AMENDMENT REQUEST TO ADOPT TSTF-439, REVISION 2,
“ELIMINATE SECOND COMPLETION TIMES LIMITING TIME FROM
DISCOVERY OF FAILURE TO MEET AN LCO”
DUKE ENERGY PROGRESS, LLC
BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324

Introduction

The licensee proposed changes eliminating second completion times (CT) limiting time from discovery of failure to meet a limiting condition for operation (LCO) for Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2. In the license amendment request (LAR) dated August 14, 2018 (ADAMS Accession No. ML18227A535), the licensee stated these changes are consistent with NRC-approved Technical Specification Task Force (TSTF) Traveler TSTF-439, Revision 2, “Eliminate Second Completion Times Limiting Time From Discovery of Failure To Meet an LCO” (ML051860296).

In Section 2.2 of the LAR, Variations and Other Administrative Changes, the licensee identifies proposed changes not found in NUREG-1433, “Standard Technical Specifications General Electric Plants BWR/4.” The licensee also stated that since the current BSEP TSs 3.7.2, “SW [Service Water] System and UHS [Ultimate Heat Sink],” and 3.8.1, “AC [alternating current] Sources—Operating,” 3.8.7, “Distribution Systems—Operating,” contain second CT, it falls within the scope of the proposed change and has been included as a variation.

Regarding proposed changes to TS LCO 3.7.2, the licensee states:

The second Completion Time was added to the BSEP TSs as part of the conversion to ITS [Improved TSs]. NUREG-1433, Revision 1 did not contain a second Completion Time within this specific section, however, BSEP adopted this restrictive change.

Regarding proposed changes to TS LCO 3.8.1, the licensee states:

After the ITS conversion, a BSEP-specific amendment was issued for TS 3.8.1, “AC Sources – Operating,” and TS 3.8.7, “Distribution Systems – Operating,” as amendments 205 and 235 for BSEP Units 1 and 2, respectively, on April 15, 1999. Due to the shared configuration of the BSEP electrical distribution systems, these amendments introduced new TS Conditions (i.e., only applicable with one unit operating and the other unit shutdown) to allow extended Completions Times necessary to allow performance of preventive maintenance on buses, transformers, breakers, and other related electrical equipment in the

shutdown unit. The Completion Times for these conditions also introduced plant-specific second Completion Times.

Regarding proposed changes to TS LCO 3.8.7, REQUIRED ACTION A.1, the licensee states:

After the ITS conversion, a BSEP-specific amendment was issued for TS 3.8.1, "AC Sources – Operating," and TS 3.8.7, "Distribution Systems – Operating," as amendments 205 and 235 for BSEP Units 1 and 2, respectively, on April 15, 1999. Due to the shared configuration of the BSEP electrical distribution systems, these amendments introduced new TS Conditions (i.e., only applicable with one unit operating and the other unit shutdown) to allow extended Completion Times necessary to allow performance of preventive maintenance on buses, transformers, breakers, and other related electrical equipment in the shutdown unit. The Completion Times for these conditions also introduced plant-specific second Completion Times.

Regarding proposed changes to TS LCO 3.8.7, Required Action D.1, the licensee states:

The onsite DC electrical power distribution system is divided into redundant and independent DC electrical power distribution subsystems, due to the unique shared electrical system at BSEP. Because each DC subsystem can be powered by a normal and alternate DC source, this specific TS Required Action covers the loss of one or more DC electrical power distribution subsystems for reasons other than the loss of the normal DC source (i.e., TS 3.8.7, Required Action C.4).

Regulatory Analysis Basis

Title 10 of the Code of Federal Regulations (CFR) Part 50.36 (c)(2)(i) state the following:

Limiting conditions for operation are the lowest functional capability or performance levels of equipment required for safe operation of the facility. When a limiting condition for operation of a nuclear reactor is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the technical specifications until the condition can be met.

The staff's request is needed to understand the basis for the deletion of the second CT in BSEP TSs identified as variations.

Request for Additional Information

TSTF-439, Revision 2 provides a discussion of each of the specifications affected by the TSTF that justifies deleting the second CTs from the specification in NUREG-1433. The licensee's application does not provide a comparable discussion for the proposed variations. For the specifications listed in the BSEP variations, TS 3.7.2, TS 3.8.1, and TS 3.8.7, provide a discussion similar to that in TSTF-439 for each specification to justify proposed deletions of second CTs. In particular, this plant-specific justification should address the following:

- a. For TS 3.7.2, Required Actions B.1, C.2¹, and E.1, the identified more restrictive change;
- b. For TS 3.8.1, Required Actions B.3, C.3, and D.5, as applicable, unique TSs due to the BSEP's shared electrical distribution systems configuration and the reference to LCO 3.8.1 NOTES a or b;
- c. For TS 3.8.7, Required Actions A.1, B.1, C.4, and D.1, as applicable, unique TSs due to the BSEP's shared electrical distribution systems configuration.

¹ During the review of the application, the NRC staff noted that the variances table in Section 2.2 of the LAR refers to TS 3.7.2, Required Action C.3. The Brunswick TS do not contain a TS 3.7.2, Required Action C.3. As shown the TS markups in Attachments 1 and 2, the proposed change is to TS 3.7.2, Required Action C.2. Accordingly, the RAI refers to TS 3.7.2, Required Action C.2.