

NRR-DRMAPEm Resource

From: Schaaf, Robert
Sent: Friday, July 5, 2019 1:06 PM
To: 'Wells, Russell Douglas'
Cc: Hulvey, Kimberly Dawn; Brown, Michael Anthony; 'Edmondson, Carla'; Saba, Farideh; Shoop, Undine
Subject: Watts Bar Nuclear Plant - Correction to Final Request for Additional Information Related to Application to Adopt 10 CFR 50.69 (EPID L-2018-LLA-0493)

Russ,

By letter dated November 29, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18334A363), the Tennessee Valley Authority (TVA) submitted a license amendment request (LAR) for the Watts Bar Nuclear Plant (WBN), Units 1 and 2. The requested amendments would modify the WBN Facility Operating Licenses to implement the provisions of 10 CFR, Part 50.69, "Risk-Informed Categorization and Treatment of Structures, Systems and Components for Nuclear Power Reactors."

By electronic mail dated June 18, 2019 (ADAMS Accession No. ML19169A359), the U.S. Nuclear Regulatory Commission (NRC) staff transmitted final requests for additional information (RAIs) regarding TVA's request. During its preparation of responses to the NRC RAIs, TVA identified a potential inconsistency with RAIs previously issued to TVA for a similar LAR for the Sequoyah Nuclear Plant, and requested clarification.

Specifically, as transmitted to TVA, Question RAI-01 currently reads, in part, as follows:

- b. Appendix X guidance states in part, [t]he relevant PRA documentation should be complete and have been incorporated into the PRA model and supporting documentation prior to closing the finding. For closure after the on-site review, Appendix X guidance further states, "[t]he host utility may, in the time between the on-site review and the finalization of the Independent Assessment team report, demonstrate that the issue has been addressed, that a closed finding has been achieved, and that the documentation has been formally incorporated in the PRA Model of Record [MOR]."

Attachment 2 of the LAR states, the internal events (including internal flooding) PRA (IEPRA) models to be used in categorization for Units 1 and 2 are both Revision 3, dated March 2017 for the respective MORs. The NRC staff notes that the F&O closure review for the internal events, including internal flooding, PRA occurred in June 2017.

- i. Confirm that all model changes associated with the closure of all F&Os reviewed during the Independent Assessment performed in June 2017 for the IEPRA (includes internal floods) model were incorporated into the PRA models and/or the supporting documentation at the time of the finalization of the Independent Assessment team report, consistent with the staff's acceptance and conditions provided in the letter dated May 3, 2017.

OR

- ii. Perform a subsequent Independent Assessment for F&O closure and/or addendum to the Independent Assessment F&O closure report to address the identified inconsistency with Appendix X, as accepted, with conditions, by the NRC staff in letter dated May 3, 2017. Provide any F&Os that remain open as a result of this review. For each F&O and/or item that remains open, provide its associated disposition to demonstrate that it has no adverse impact on the 10 CFR 50.69 risk-informed application.

- iii. Alternatively, propose a mechanism that assures all the PRA model and documentation changes reviewed by the Independent Assessment team for the closure of all F&Os in the final Independent Assessment report are incorporated into the MOR(s) prior to implementation of the 10 CFR 50.69 risk-informed categorization.

The construction of this question in the RAI is in error. The question should include an "OR" between items b.ii., and b.iii. In other words TVA has the option to respond to either RAI-01 item b.i., OR item b.ii., OR item b.iii.

The staff regrets any inconvenience this error may have caused. Please contact me at 301-415-6020 if you have any questions regarding this clarification.

Regards,

Robert G. Schaaf

Senior Project Manager

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U.S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Division of Operating Reactor Licensing
Mail Stop O-8B1A

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