



Pre-Submittal Meeting for:
COMANCHE PEAK NUCLEAR POWER PLANT
DOCKET NOS. 50-445 AND 50-446
February 12, 2020

License Amendment Request for Changes
to Certain Emergency Action Levels

Participants

- Comanche Peak
 - Jeff Hull, CPNPP EP Manager
 - Jim Barnette, CPNPP Licensing
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- NRC
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AGENDA

- Current EAL Basis and Reason for Proposed Amendment
- Description of Proposed EAL Changes
- LAR Format
- LAR Schedule
- Conclusions
- Questions?

Current EAL Basis and Reason for Proposed Amendment

- CPNPP's currently approved EAL scheme is based on the guidance established in NEI 99-01, Revision 6.
- In a letter dated June 14, 2016, the NRC approved an amendment supporting the implementation of this NEI 99-01, revision 6 EAL scheme at CPNPP Units 1 and 2.
- Subsequent industry operating experience has resulted in several EPFAQs, as well as approval of other beneficial differences and deviations from the guidance of NEI 99-01 Revision 6 in later licensee submittals.
- Based on feedback from the site users since implementation of the current scheme, CPNPP also proposes to further clarify several EALs in order to ensure all users correctly classify any potential emergency condition at the site.

Description of Proposed EAL Changes

1 - Incorporate EPFAQs

- Since the NRC endorsement of the NEI 99-01, Rev 6 guidance in March 2013, NEI has been working with the NRC in efforts to further enhance the guidance based on clarifications provided by the NRC through the Emergency Preparedness Program Frequently Asked Question (EPFAQ) process.
- Specifically, two of the proposed changes involve revising the EALs based on the clarifications provided through EPFAQs 2015-013 and 2016-002 as accepted by the NRC.
 - EPFAQ 2015-013, option not to include EAL HG1 in the site specific scheme, and
 - EPFAQ 2016-002, ICs CA6 and SA9 “Hazardous event affecting a SAFETY SYSTEM needed for the current operating mode” and the definition of VISIBLE DAMAGE
- CPNPP proposes to adopt the updated IC/EALs and clarifying guidance provided in these EPFAQs into its currently approved EAL scheme.

Description of Proposed EAL Changes

2 - Remove MSL radiation monitors

- Remove consideration of the Main Steam Line (MSL) radiation monitors from Table R-1, "Effluent Monitor Classification Thresholds" of the CPNPP EALs RU 1.1, RA 1.1, RS 1.1, and RG 1.1.
- Calculation of a single threshold value for these EALs requires multiple simultaneous assumptions (e.g., primary to secondary leak rate, effluent pathway, and release rate) which could easily result in an incorrect assessment of these EALs in several potential accident scenarios.
- Monitors will still be used for dose assessment using real time met information in the event of a SGTR.
- System design is very similar to plants such as Vogtle, Farley, and Point Beach which have removed precalculated threshold values for the MSL monitors.

Description of Proposed EAL Changes

3 - Consideration of Tech Spec Completion Times

- CPNPP proposes to ensure Technical Specification (TS) allowed completion times are taken into account by the decision makers when assessing EAL SU4.1, “Reactor coolant activity greater than Technical Specification allowable limits.”
- Clarifies that classification using this EAL is not warranted for momentary spikes in reactor coolant activity that are addressed by the required actions of the TS.

Description of Proposed EAL Changes

4 - Alternate EAL for Seismic Event IC

- CPNPP proposes to add an additional or alternate EAL to IC HU2, “Seismic event greater than OBE level.”
- The current EAL IC HU2 is solely dependent on the installed Seismic Instrumentation at CPNPP and evaluation of this EAL is not possible during periods when the seismic monitor is out of service.

Description of Proposed EAL Changes

5 - Clarify Crediting of Alternate Power Supplies

- CPNPP proposes to add the following additional statement to EALs CA2.1, SS1.1, SG1.1, and SG1.2 (SG8 in NEI 99-01, Rev 6) Basis discussions to clarify to the decision makers that the use of other than normal power supplies can be credited in the evaluation of these ICs/EALs:
 - *If mitigative strategies establish emergency power to any bus listed in the EAL, the EAL threshold for this Initiating Condition is not met.*

Description of Proposed EAL Changes

6 – Correction of Minor Editorial and Typographic Errors

- CPNPP proposes to address a range of minor inconsistencies between the Bases document and the EAL wallcharts to prevent potential user confusion.
 - For example, in IC/EAL RU1.2 the Bases document uses “>” and the wallchart uses “greater than”
 - Change would make both read the same
- Each minor change is listed captured on a Table in the amendment request which also shows how it is resolved.

Planned LAR Schedule

- Submittal of LAR by **March XX, 2020**
- Request approval by **March 30, 2021**
- Proposing a 180 day implementation period

Conclusions

- Evaluation of the proposed changes was performed pursuant to 10 CFR 50.54, “Conditions of Licenses,” paragraph (q), “Emergency Plans,” using the guidance specified in Regulatory Issue Summary (RIS) 2003-18, Supplement 2, “Use of Nuclear Energy Institute (NEI) 99-01, Methodology for Development of Emergency Action Levels.”
- Evaluation determined that several of the proposed changes to the EALs would be considered “Deviations” from the NRC-endorsed guidance provided in NEI 99-01 Revision 6, and in some cases would reduce the multiple and diverse means available to decision-makers in assessing whether or not an Initiating Condition exists, and that therefore these proposed changes would require NRC review and approval prior to implementation.
- The proposed changes to the specific ICs/EALs do not reduce the capability to meet the applicable emergency planning requirements established in 10 CFR 50.47 and 10 CFR 50, Appendix E, and will continue to meet the NRC-endorsed NEI 99-01, Revision 6 guidance.

Questions?

