

July 26, 2000

MEMORANDUM TO: Raj Anand, Project Manager  
License Renewal and Standardization Branch  
Division of Regulation Improvement Program  
Office of Nuclear Reactor Regulation

FROM: Eric W. Weiss, Section Chief **/RA/**  
Fire Protection Engineering and Special Projects Section  
Plant Systems Branch  
Division of Systems Safety and Analysis  
Office of Nuclear Reactor Regulation

SUBJECT: COMMENTS ON THE DRAFT TECHNICAL EVALUATION REPORT  
FOR THE REVIEW OF WESTINGHOUSE GENERIC TECHNICAL  
REPORT WCAP-14756 (TAC No. M97765)

In response to your request, we have reviewed the draft technical evaluation report (DTER) prepared by Brookhaven National Laboratory and its related documentation, Westinghouse Generic Technical Report WCAP-14576. Our review concludes that the scoping portion evaluation of the DTER is acceptable with comments. Our comment is addressed in the Attachment.

Attachment: As stated

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(301) 415-1816

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ORIGINATOR: JIN-SIEN GUO

SECRETARY: LISA KOENICK

DATE: July 28, 2000

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Comments on the Draft Technical Evaluation Report (DTER)  
prepared by Brookhaven National Laboratory (Project No. 686)

The staff finds the draft Technical Evaluation Report acceptable for the scoping of the containment aging management evaluation prepared by the Westinghouse Generic Technical Report (GTR) WCAP-14576 with the following comments:

1. In Section 2.1.1, Intended Functions (on DTER, page 7), the GTR indicated intended functions are not specific for the containment structures. However, the following functions should be added:
  - (1) Provides structural or functional support of safety-related systems, structures, and components following a design basis accident (DBA). The post-tensioning prestress tendons will contribute to this function.
  - (2) Serves as an external missile barrier. The containment structure is designed for all missile forces.
  - (3) Provides a heat sink during a DBA or station blackout. The containment structure serves as passive heat sink in addition to the spray system.
2. Section 2.1.2 Containment Structure Components (on page 9), which addressed three configurations of the PWR containment types. Westinghouse divided the PWR containment into ten containment structural components that are common to all Westinghouse reactor containment structures. However, specific components for each containment configuration should also be addressed in the GTR.
3. Section 3.1.2.1.3, Steel-Lined Reinforced Concrete Containment with Post-Tensioning (on page 16), in which the DTER asked whether the tendon access gallery is part of the containment and subject to aging management review. In its response to RAI No. 9, Westinghouse indicated that tendon access galleries are not generally considered to be part of the containment, and therefore, are only subject to an aging management review if they are considered to support the integrity of the prestress system. Actually, the tendon access gallery is part of the containment structure. The reason for not requiring an aging management review is that they do not perform the containment intended function. The licensees may perform aging management review if they determine that the tendon gallery is important to the post-tension prestress system.
4. Section 3.1.2.2 states that PWR containment foundation typically consists of a reinforced mat (page 16). This statement should be clarified to state "a reinforced concrete mat."
5. Section 3.1.2.10, Equipment and Personnel Hatches that Include Seals (on page 23), states that the scope of the GTR includes each entire airlock including the equalizing valves, handwheel shaft seals, and door seals. Electrical penetrations of the airlock bulkheads are not included. Any component not included in the scope for license renewal, for example, electrical penetrations, should provide a basis, why it does not perform the airlock's intended function.