

October 15, 2001

MEMORANDUM TO: File

FROM: Robert M. Pulsifer, Project Manager, Section 2 /RA/
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: DRAFT REQUEST FOR ADDITIONAL INFORMATION - CONSTANT
PRESSURE POWER UPRATE - GE NUCLEAR ENERGY
(TAC NO. MB2510)

The attached draft request for additional information (RAI) was transmitted by e-mail on October 2, 2001, to James Klapproth of GE Nuclear Energy. The review of the RAI would allow the licensee to determine and agree upon a schedule for responding to the RAI. This memorandum and the attachment do not convey a formal request for information or represent an NRC staff position.

Project No. 710

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Request for Additional Information

Section 10.5.3 Operator Response - Section 10.5.3 states that the increase in power level results in changes to event dynamics. CPPU reduces certain operator response times which could decrease operator reliability. Based on PRA experience for uprated BWRs, some effect is expected on PRA results (such as CDF and LERF). The CPPU effect will be determined when the plant specific PRA is revised.

The staff believes that the results of the plant specific PRA, by themselves, would not provide sufficient information to support a safety evaluation concerning the effect of CPPU on operator response. The staff will expect the plant-specific submittal to explain and justify any changes in plant risk that result from changes in risk-important operator actions. The submittal should describe any new risk-important operator actions required as a result of the proposed power uprate and changes (e.g., reduced time available or additional time required) to any current risk-important operator actions that will occur as a result of the power uprate. The submittal should describe the specific procedural steps involved in these actions. The submittal should also address any operator workarounds that might affect these response times and identify any operator actions that are being automated as a result of the power uprate. Please state how the guidance to be provided by GE will be consistent with the staff's expectations for the plant specific submittal?

Section 10.6 Operator Training and Human Factors - Section 10.6 states that classroom training will address "various aspects of CPPU." Although examples of training topics are provided, it is not clear what selection criteria would be used to identify the material that will be addressed in training. Please describe the criteria for selecting the training topics or how the guidance to be provided by GE will be consistent with the selection of training topics in accordance with a systems approach to training.

Section 10.6 states that simulator changes and fidelity revalidation will be performed in accordance with ANSI/ANS 3.5-1985. Please describe the schedule for these activities relative to the implementation of the associated simulator training and uprated power operation. The staff notes that the topical report guidance, as presently written, commits licensees to use ANSI/ANS 3.5-1985. More recent revisions of this standard that have been endorsed by the NRC (including the 1998 revision for which NRC endorsement is expected in the near-term) would also be acceptable and may be preferable. Please state why the topical report guidance is limited to the 1985 revision of ANSI/ANS 3.5.

The report does not identify the human factors changes that will be necessary to support CPPU. The staff will need to know the changes that will be made to control room displays, controls, and alarms and how the operators will be tested to determine that they can use the instruments reliably. Please provide this information or the bases for a conclusion that necessary human factors changes will be identified and implemented as part of a licensee's preparation for CPPU.

Section 10.9 Emergency Operating Procedures - In addition to emergency operating procedures the report should address any changes to abnormal operating procedures. Please describe the effect of CPPU on abnormal operating procedures and the basis for GE's disposition.