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Subject: Fwd: RAI relating to STP -Loss of Power amendment
Creation Date: 10/22/03 3:05PM
From: David Jaffe

Created By: DHJ@nrc.gov

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From: David Jaffe
To: awharrison@stpegs.com
Date: 10/22/03 3:05PM
Subject: Fwd: RAI relating to STP -Loss of Power amendment

Please call me. Thanks

From: John Knox
To: Minns, John
Date: 10/16/03 4:18PM
Subject: RAI relating to STP -Loss of Power amendment

Proposed questions are attached. Formal responses are needed to complete the SE.

In our review of a similar amendment request relating to loss of power instrumentation at Millstone, Ronaldo Jenkins raised a concern relating to the appropriateness of declaring the DG inoperable when the loss of power instrumentation is inoperable. There is nothing wrong with the DG; thus, it is inappropriate to declare the DG inoperable.

>>> David Jaffe 10/15/03 02:33PM >>>

Section 2.0 ends with Table 1. Section 3.0 is "Background" but the forgot the "3.0". OK?

>>> John Knox 10/15/03 01:10PM >>>

In regard to STP's letter dated September 22, 2003 (Ref:NOC-AE-03001578) relating to proposed change to loss of power instrumentation TS, attachment 1 is missing part of sections 2.0 and 3.0. I do not need this information to write the rejection SE. It is already written and you have the SE, but we should have their complete submittal. Currently, Additional questions are being prepared based on information in their new submittal.

>>> John Minns 10/15/03 09:34AM >>>

Please note that J Knox has informed me that the STP Loss of Power amendments will required an additional Tacs. Th licensee has submitted two different documents for the loss of power amendment. Thanks John

CC: Jaffe, David; Jenkins, Ronaldo

1. Response to question 1 (attachment 4) states "...the loss of power instrumentation relays perform a support function for the sequencer only for its functions to start and/or load its associated standby diesel generator (SDG) for those events involving a loss of off-site power. With the loss of power relays inoperable, the sequencer is still able to perform its function to sequence on safety injection loads for accidents not involving a loss of off-site power." With no loss of off-site power and with inoperable loss of power instrumentation (that is the loss of power instrumentation has failed such that it is doing its support function of sending a signal to start and load the DG), explain how the sequencer is still able to perform its function to sequence on safety injection loads for accidents not involving a loss of off-site power.
2. Response to question 1 (attachment 4) states "STPNOC's position is that the sequencer does not perform a support function for the offsite power." Pursuant with this position, provide a description of the analysis and its results demonstrating the offsite system is in compliance with the requirements of Criterion 17 of 10 CFR Part 50, Appendix A, without the support of the sequencer. Provide the description of the analysis and its results using applicable marked up FSAR pages.
3. The TS amendment request states that one channel of loss of power instrumentation has been removed from the scope of the Technical Specifications. Provide the basis and justification for this removal of one channel from Technical Specification pursuant to Criteria 1, 2, 3, and 4 of 10 CFR 50.36(c)(2)(ii).
4. Response to question 2 (attachment 4) states: "Even though the capability to trip the supply breaker is lost during a degraded or loss of voltage event due to an inoperable sequencer, the power distribution system is not inoperable as long as adequate voltage is supplied from the offsite system." Provide a description of the analysis and its results demonstrating that the power distribution system is in compliance with the requirements of Criterion 17 of 10 CFR Part 50, Appendix A, even though the capability to trip the supply breaker is lost during a degraded or loss of voltage event due to an inoperable sequencer. Provide the description of the analysis and its results using applicable marked up FSAR pages.
5. The TS amendment request indicates that the loss of power relays perform a support function for the sequencer only for its functions to start and/or load its associated standby diesel generator (SDG) for those event involving a loss of off-site power. STPNOC considers opening of the offsite power supply breaker to be a function the sequencer performs as part of its function to start and load its associated SDG. Inoperable loss of power instrumentation cause the sequencer and the offsite supply breaker to be inoperable; however, the ultimate effect of inoperable loss of power instrumentation is that the associated standby diesel generator will not load and is therefore inoperable. When loss of power instrumentation is inoperable, current TS cover the inoperable DG as well as the sequencer and offsite supply breaker. The proposed TS limits itself to an inoperable DG for the case when loss of power instrumentation is inoperable. The proposed TS does not cover the inoperable sequencer and offsite supply breaker. Provide the basis and justification for this removal of the sequencer and offsite supply breaker from Technical Specification pursuant to Criteria 1, 2, 3, and 4 of 10 CFR 50.36(c)(2)(ii) for when loss of power instrumentation is inoperable.