

From: Stacey Imboden
To: jim.knorr@nmcco.com
Date: 10/12/04 3:15PM
Subject: Fwd: Point Beach Follow-up items

Jim,

Attached are some items raised during last week's conference call on the Point Beach SAMA RAI responses. I will get back to you regarding your question about the 10d response. These are not new RAIs, but are clarifications requested by NRC staff on the original SAMA RAI responses submitted. I am also attaching the rest of the clarifications requested during the conference call. Please provide responses by e-mail to me (in the interest of time) and by letter. I have also left you a voicemail about this.

Thanks,
Stacey

CC: Cristina Guerrero

From: Robert Palla
To: Stacey Imboden
Date: 10/12/04 2:49PM
Subject: Point Beach Follow-up items

During the call last week, the licensee noted that the SGTR release fractions for Point Beach were in fact similar to those for Ginna (calling into question the premise for our follow-up on RAI 9). We agreed to check into this following the call and get back to them. We also asked a few clarifying questions at the end of the call. We indicated that we would document these. Below is a summary. Note that item 4 was not discussed. Hopefully this will not require another call.

1. Drop the Question related to RAI 9, but specifically consider SGTR related SAMAS from other plants in the PBNP response to our Question related to RAI 6.

2. Clarify whether there are two PRAs (Unit 1 and Unit 2), or if there is just one PRA that is being applied to both Units. If there are two PRAs, which is given in the results provided in the ER and the RAI responses.

3. In Section 4.20.5 of the ER, PBNP identifies that there were 9 SAMA candidates which required further identification. Please identify these nine SAMAs.

4. In the PBNP RAI response to Question 2.a, please provide further information on:

Compartment 187: A cost-benefit assessment of adding Automatic Suppression and any other actions considered, relative to the PBNP statement "No other actions have been identified."

Compartment 326: Rationale for the statement, "No further action is necessary."

Compartment 319: What modification was installed to correct the situation, and how that modification makes "No further action necessary."

5. Clarification to 10d - to be provided by PNNL (with cc to Stacey) by COB

CC: Fred.leverenz@pnl.gov

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Subject: Fwd: Point Beach Follow-up items
Creation Date: 10/12/04 3:15PM
From: Stacey Imboden

Created By: SXF@nrc.gov

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| nmcco.com jim.knorr (<u>jim.knorr@nmcco.com</u>) | Transferred | 10/12/04 03:15PM |

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Comments on Point Beach RAI Responses

RAI 1.a.iii - The utility reports that the revision of the HRA per the peer review would have impacted two SAMAs -- a new SAMA relative to operator action to cross-tie 480VAC power and an existing SAMA (180) would be more cost beneficial. For other human error events, NMC reports implementation of "procedure mark offs". Do the procedures relative to these two items implement this "procedure mark off"? If not, explain why these should not be further assessed as potential cost-beneficial SAMAs. The response also states that there is no way of reducing the impact of human error except automation, which is too costly. Further justify this premise, especially, since other SAMA analyses were not reviewed as part of the SAMA identification process (see RAI 6 below).

RAI 1.a.v - A date of 10/12/2001 is provided for Rev. 3.00 (the PRA version that was peer reviewed). This date is later than the date of the peer review, which was said to have been conducted in June 2001. Explain.

RAI 1.b - CDF and population dose (rem) information provided in the second and third table can be used to determine the population dose (per event) for each event type. The population dose values obtained this way do not agree with the values in ER Table F.1-4. Also, use of the CDF values in the RAI response, in conjunction with the dose and dollar values in ER Table F.1-4, do not yield the same annual dose and offsite economic cost values as used in the ER. Explain.

RAI 1.e - ER Table F.1-2 and F.1-4 provide information for only 4 release categories. Early SGTR and ISLOCA are grouped together in Table F.1-2, but ISLOCA results are not shown in Table F.1-4. Per the RAI response, ISLOCA consequences were assumed to be 6X larger than the SGTR values, but it is not clear whether both the person-rem and dollar values for ISLOCA were increased in this manner. Provide a separate breakout of the ISLOCA consequences.

RAI 3 - The response does not provide the one-to-one cross reference requested. Please indicate which SAMA number from Table F.2-1 considers each of the dominant contributors. For each dominant contributor from Attachment 1 that does not tie to a SAMA in Table F.2-1, justify why no SAMA was identified and evaluated.

RAI 4 - Based on the response, the costs per unit for SAMA 169 could be conservatively estimated at \$100K (1/2 of the reported value). This SAMA would appear cost beneficial at 3% discount rate or when uncertainties are considered. Provide additional justification why this SAMA should not be implemented (including a more realistic estimate of costs or benefits, if appropriate).

RAI 6 - The response does not address the request to consider low-cost options identified in Ft. Calhoun, R.E. Ginna, and D.C. Cook. This information is needed to conclude the adequacy of the set of candidate SAMAs evaluated in the ER.

RAI 9 - The response did not address the question regarding the differences in release fractions between Point Beach and Ginna. In the absence of this information, justify that no SGTR-related SAMAs would be become cost-beneficial if the fission product releases for SGTR events were substantially higher, and similar to those for Ginna. Also address the implications of higher SGTR releases on the identification of cost-beneficial SAMAs for ISLOCA, since the

consequences for ISLOCA events are treated as a multiple of those for SGTR.

RAI 10b - Information requested in the first portion of this RAI has not been provided (details of the benefit assessment for selected SAMAs, description of the modifications considered, and explanation why human error probability could not be reduced by other means). This information is needed to conclude the adequacy of the set of candidate SAMAs evaluated for SGTR events.

RAI 10d - The response does not address the request to provide the residual benefit after implementation, and an explanation why further actions would not be cost-beneficial. (We are unconvinced that any further enhancements would need to involve replacing human action with an automated system. In fact, based on scoping calculations, the change in human errors by a factor of 3 does not change the importance measure of any of the highest (RRW) human errors.) Please provide the requested information.