



## RPS/ESPS Licensing Amendment Request

Oconee Nuclear Station April 6, 2005



## Agenda

- Opening Remarks
- Project Status
- RPS/ESPS Modification
- Diverse LPI actuation
- Discrepancy between TXS TR and SER
- Risk-informed D3
- NRC Questions
- Closing Remarks



## Opening Remarks

- Introductions
- Purpose of Meeting & Expected Outcome
  - Meeting Purpose
    - NRC questions
    - Communicate details of proposed LAR
  - Expected Outcome
    - Address preliminary questions from NRC
    - Good mutual understanding of proposed LAR and RPS/ES modification



## Project Status

- Project Activities Completed
  - > 30% Owners Review of FANP
    - Initial Scope Document
    - Engineering Turnover
    - Technical Issues Checklist (Multi-Discipline Interface Identifier)
    - Project Change Order Reconciliation
    - Design Document Red Marks
  - Procedure Writers Training
    - 3 Week Intensive training on TXS for procedure revisions



## Project Status

### Upcoming Major Project Activities

- ➢ Beznau NPP Benchmark Trip Mid July 2005
- > FANP-NGL Hardware FAT in Germany November 2005
- ➤ FANP-NGL TXS Equipment @ ONS December 2005
- > FANP-Alpharetta TXS FAT @ ONS January thru March 2006
- FANP Lynchburg RCPPM & NI FAT @ ONS January thru March 2006
- ➢ ONS SAT April 2006 through September 2006



## **Project Status**

- Upcoming Project Activities (Continued)
  - Procedure Verification & Validation August thru September 2006
  - ➤ Implementation October thru November 2006
  - ➤ Post Implementation Testing Late November 2006
  - ➤ Unit 1 Return to Service Early December 2006
- Numerous Internal Project Deliverables Through April 2006



#### RPS/ESPS Mod.

- Modification Description
  - Replacement of Analog Bailey RPS/ES with Digital FANP TXS
  - Replacement of some analog/solid state input signal components (RCPPM, NI modules)
- Modification Scope Review
  - R x R 9 RPS Cabinets, 7 ES Cabinets
  - Delete ES Bailey RZ Module interface panels
  - ➢ Add ES Component Status Panels
  - Add ES Channel Trip/Reset Pushbutton Station
  - > Add, Relocate some ES actuated component operator control interfaces
  - Additional Redundancy for RCPPM
  - NI Recorder replacement (Units 1 & 2)



#### ❖ FMEA

- ➤ Reliability Analysis for FANP TXS April 05
- FMEA for FANP TXS underway
- > Final FMEA for modification December 05

#### Instrument changes

- No field sensor replacements planned as part of RPS/ES modification
- Revision to instrumentation loop accuracy calculations underway



#### Mechanical changes

- Verification of acceptable heat loading from new TXS, RCPPM to Control Room and Cable Room underway
- Verification of acceptable heat rise in new TXS cabinetry included in FAT and post-implementation testing
- Verification of SBO Analyses



#### Electrical changes

- > System cabling requirements evaluation
- Power systems loading analysis
- > Human Factors evaluation underway for Control Room changes
- Modification documentation changes underway

#### Civil changes

- New cabinet seismic mounting design underway
- Cable tray and conduit installation evaluation underway
- > Review of seismic qualification of non-TXS equipment



#### Design criteria

- Electrical separation
- Cable and wiring Separation
- Use of fiber optics for Inter-Channel connections

#### Functional criteria

- > Equipment Specification Revision 1 approved March 2005
- ➤ Functional Requirements Specification approved March 2005
- ➤ Software Requirements Specification approval August 2005



- ❖ PRA
  - > PRA Input information development underway
- UFSAR Summary
  - ▶ UFSAR Changes in Draft (Red Marked) Stage
- Design Basis Documentation
  - > DBD Changes in Draft (Red Marked) Stage



### Diverse LPI Actuation

- Provided diverse LPI actuation design requirements in November
   17, 2004 meeting
- NRC concurred with design requirements
- Duke approval of FANP proposed design strategy March 2005
- Duke to provide additional details by June 2005



## Discrepancy between TXS TR and SER

- In one location, TXS Topical Report could be read as indicating that invariable data is stored in the EEPROM and is subject to cyclical redundancy checks (CRCs)
- TXS SER essentially repeats this
- No invariable (Non Changeable Parameter) data is stored in the EEPROMs
- CRCs are performed on EEPROMs only on use (anytime the data is moved from the EEPROM to RAM or RAM to EEPROM)



## Risk-informed D3

- Duke performed deterministic D3 assessment per BTP HICB-19 guidelines
- New EPRI guideline provides risk-informed method of performing parts of or all of D3 assessment
- Duke plans to use EPRI extended deterministic approach to demonstrate adequate defense against digital common cause failures and concurrent LBLOCA based on small change in risk
- Duke plans to submit by July 2005 and request approval within a year
- Upon approval, Duke would discontinue design/installation of diverse LPI actuation



## NRC Questions

- ❖ Informal NRC questions received March 30, 2005
- Plan to provide initial response electronically
- Follow-up with docketed response
- Discussion of NRC Questions



## Closing Remarks

Closing Remarks



# Technical Specification Change

- Combine current and proposed TS requirements by using qualifiers and notes
- Eliminate 12 hour Channel Checks
- Extend Channel Functional Test Intervals to 18 months