

NRCREP - Progress Energy Comments on Control Room Habitability CLIP (71 Fed. Reg. 61075 October 17, 2006)

From: "Miller, David (Bryan)" <David.Miller@pgnmail.com>
To: <CLIP@nrc.gov>
Date: 11/16/2006 2:17 PM
Subject: Progress Energy Comments on Control Room Habitability CLIP (71 Fed. Reg. 61075 October 17, 2006)

<<06-078 CRH CLIP Comments.pdf>>

Progress Energy Comments on Model Safety Evaluation on Technical Specification Improvement to Modify Requirements Regarding Control Room Envelope Habitability Using the Consolidated Line Item Improvement Process (71 Fed. Reg. 61075 October 17, 2006).

10/17/06

71 FR 61075

①

RECEIVED

2006 NOV 16 PM 4: 58

RULES AND DIRECTIVES
BRANCH
USNRC

SUVSI Review Complete
Template = ADM-013

FRIDS = ADM-03
Add =
O. Craig Harbuck
(OCH)

Mail Envelope Properties (455CB929.C54 : 7 : 27732)

Subject: Progress Energy Comments on Control Room Habitability CLIP (71
Fed. Reg. 61075 October 17, 2006)
Creation Date Thu, Nov 16, 2006 2:15 PM
From: "Miller, David (Bryan)" <David.Miller@pgnmail.com>
Created By: David.Miller@pgnmail.com

Recipients

nrc.gov
TWGWPO03.HQGWDO01
CLIP

Post Office

TWGWPO03.HQGWDO01

Route

nrc.gov

Files	Size	Date & Time
MESSAGE	290	Thursday, November 16, 2006 2:15 PM
TEXT.htm	830	
06-078 CRH CLIP Comments.pdf		85129
Mime.822	120229	

Options

Expiration Date: None
Priority: Standard
ReplyRequested: No
Return Notification: None

Concealed Subject: No
Security: Standard



PO Box 1551
411 Fayetteville Street Mall
Raleigh NC 27602

Serial: PE&RAS-06-078
November 16, 2006

Chief, Rulemaking, Directives, and Editing Branch
Division of Administrative Services
Office of Administration, Mail Stop: T-6 D59
United States Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: Comments on "Model Safety Evaluation on Technical Specification Improvement to Modify Requirements Regarding Control Room Envelope Habitability Using the Consolidated Line Item Improvement Process," 71 Fed. Reg. 61075 (October 17, 2006)

Ladies and Gentlemen:

Progress Energy is pleased to submit comments on the subject model safety evaluation. Progress Energy is aware of the considerable interaction that has taken place between the NRC staff and stakeholders over the last several years to address the control room envelope habitability issue. Progress Energy appreciates the efforts of those who have worked diligently to resolve this regulatory issue.

Progress Energy is providing the following comments for the staff's consideration.

- In Section 2.3 (page 61078), the model safety evaluation states:

Prior to incorporation of TSTF-448, Revision 3, the STS requirements addressing control room habitability resided only in the following CRE ventilation system specifications:

- NUREG-1430, TS 3.7.10, "Control Room Emergency Ventilation System (CREVS);"
- NUREG-1431, TS 3.7.10, "Control Room Emergency Filtration System (CREFS);"
- NUREG-1432, TS 3.7.11, "Control Room Emergency Air Cleanup System (CREACS);"
- REG-1433, TS 3.7.4, "[Main Control Room Environmental Control (MCREC)] System;" and
- NUREG-1434, TS 3.7.3, "[Control Room Fresh Air (CRFA)] System."

Other Technical Specifications currently exist that are directly related to control room habitability (e.g., NUREG-1430, TS 3.3.16, "Control Room Isolation - High Radiation," NUREG-1431, TS 3.3.7, "CREFS Actuation Instrumentation," and NUREG-1432, TS 3.3.8, "Control Room Isolation Signal (CRIS)").

It is recommended that the paragraph be revised as follows:

Prior to incorporation of TSTF-448, Revision 3, the STS requirements addressing control room ~~habitability-envelope boundary operability~~ resided only in the following CRE ventilation system specifications:

- Section 2.4 (page 61078) characterizes the six year surveillance frequency for demonstrating unfiltered leakage into the control room envelope (CRE) is within limits as a *relatively long test interval (frequency)*. When compared with the 15 year test frequency justified for the integrated leak rate test of containment, the six year frequency seems exceedingly short. This is particularly true given the safety (risk) significance of containment relative to the CRE boundary. Therefore, the bases for the six year frequency should be included in the model safety evaluation. Additionally, the model safety evaluation should allow sites the option to justify a site specific test frequency based on unique site characteristics using a risk-informed approach. (e.g., Regulatory Guide 1.177 - *An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications*)
- In Section 3.4 (page 61081), the model safety evaluation states:

The program shall ensure that adequate radiation protection is provided to permit access and occupancy of the CRE under design basis accident (DBA) conditions ...

The control room envelope boundary and programs to maintain it are providing the necessary radiological protection for occupancy of the control room. The program is independent of any ability to “access” the control room. Therefore, it is recommended that the sentence be revised as follows:

The program shall ensure that adequate radiation protection is provided to permit ~~access~~ and occupancy of the CRE under design basis accident (DBA) conditions ...

- Section 3.2 of the example application (page 61084) requires that the applicant make three commitments. Commitments 2 and 3 state:

2. [LICENSEE] will revise procedures to implement the new surveillance and programmatic TS requirements related to CRE habitability.

3. [LICENSEE] commits to Regulatory Positions C.1 and C.2 of Regulatory Guide 1.197, “Demonstrating Control Room Envelope Integrity at Nuclear Power Reactors,” Revision 0, May 2003, with the following exceptions: [Add descriptions of proposed exceptions.]

In the case of commitment 2, 10 CFR 50, Appendix B, Criterion V, “Instructions, Procedures, and Drawings,” already requires that, “Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.”

In the case of commitment 3, the commitment is specifically addressed by the wording that will be included in Technical Specifications per Technical Specification Task Force 448 (TSTF-448) Section 5.5.18c (5.5.15c for boiling water reactors) which states:

Requirements for (i) determining the unfiltered air leakage past the CRE boundary into the CRE in accordance with the testing methods and at the Frequencies specified in Sections C.1 and C.2 of Regulatory Guide 1.197, "Demonstrating Control Room Envelope Integrity at Nuclear Power Reactors," Revision 0, May 2003, and (ii) assessing CRE habitability at the Frequencies specified in Sections C.1 and C.2 of Regulatory Guide 1.197, Revision 0.

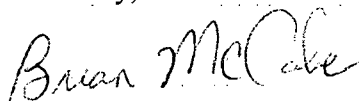
[The following are exceptions to Sections C.1 and C.2 of Regulatory Guide 1.197, Revision 0:

1. ; and]

Therefore, upon approval of the licensee's amendment request, proposed commitments 2 and 3 will be addressed through legally binding regulatory obligations (i.e., 10 CFR 50, Appendix B and Technical Specifications) making regulatory commitments duplicative and an unnecessary burden on the licensee. It is recommended that commitments 2 and 3 be deleted from the subject model safety evaluation.

Please contact me at (919) 546-4579 if you have any questions.

Sincerely,



Brian McCabe
Supervisor - Regulatory Affairs

DBM

United States Nuclear Regulatory Commission
PE&RAS-06-078

bc: Wes McGoun
Ray Crandall
Jim Riley (NEI)
Dave Corlett
Paul Infanger
Chuck Baucom
Annette Pope