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To: Sedney, Kathy K. (GE Infra, Energy)
Date: 11/28/2006 10:32:59 AM
Subject: RAI 16.2-65

Karen - Aron Lewin, reviewer for RAI 16.2-65, has unresolved questions (which are attached) and requests a telecon. Please reply with a potential teleconference date and time next week.
jg

CC: Amy Cubbage; Aron Lewin; Lawrence Rossbach

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Issues Regarding RAI Response to LCO 3.10.1_1.wpd		

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Issues Regarding RAI 16.2-65 GE Response

- The GE response does not address the RAI regarding the fact that hydrostatic and scram time testing could continue for extended periods of time when required LCOs are not met.

As an example, ESBWR TS 3.6.3.1, "Reactor Building", would allow testing to continue in Condition A for 7 days and would allow testing to continue in Condition B for 48 hours. Condition A is entered when one or more penetration flow paths have one Reactor Building boundary isolation damper inoperable, while Condition B is entered when one or more penetration flow paths have two Reactor Building boundary isolation dampers inoperable. For comparison purposes, BWR/6 STS 3.6.4.2, "Secondary Containment Isolation Valves (SCIVs)", lists an eight hour Completion Time for Condition A, and a four hour Completion Time for Condition B. Condition A is entered when one or more penetration flow paths have one SCIV inoperable, while Condition B is entered when one or more penetration flow paths have two SCIVs inoperable. Both LCOs are in place in order to satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

- The GE response of providing a note in TS 3.10.1 Required Action A.1 that says "Required Actions to be in Mode 3 include reducing average reactor coolant temperature to less than or equal to 200F within 36 hours" does not reflect the desired stated end state of being in Mode 5 with average reactor coolant temperature less than or equal to 200F should the LCO not be met.

For comparison purposes, BWR/6 STS 3.6.4.1, 3.6.4.2, and 3.6.4.3 have specific actions to be taken if operations with a potential for draining the reactor vessel (OPDRVs) are taking place. If Required Actions and Completion Times cannot be met during OPDRVs, the specific actions require suspension of testing, which should result in cold shutdown with average reactor coolant temperature being reduced to less than or equal to 200F. BWR/6 STS 3.3.6.2 refers to the above mentioned STS if Required Actions and associated Completion Times of STS 3.3.6.2 cannot be met.

In order to ensure that appropriate actions are taking place, recommend either modeling ESBWR TS after BWR STS regarding Applicability, Conditions, Required Actions and Completions Times during OPDRVs or eliminate ESBWR TS 3.10.1 Required Action A.1.