

**From:** David Jeng  
**To:** Jonathan Rowley  
**Date:** 10/04/2007 12:30:54 PM  
**Subject:** Re: Additional RAI Recommended for Issuance to VY Applicant to Provide Response

I read the "Response to Part C" on page 4 of 4 of the VY letter addressing the cooling tower RAI, and still maintain that the applicant should be requested to respond to item 2 below to indicate specific improvements/enhancements that will be implemented over the existing structure monitoring program applicable to C 2-1/C 2-2 in order to preclude occurrence of similar failure in the future. The staff should review the applicant's response to item 2 below and determine whether the improvements/enhancements proposed by the applicant are adequate and acceptable. The applicant should also be requested to provide response to item 1 below as I previously suggested for staff review.

David  
>>> Jonathan Rowley 10/04/2007 11:51 AM >>>  
David

Could you read the "Response to Part C" on page 4 of 4 of the VY letter addressing the cooling tower RAI? The response discusses the Structures Monitoring Program that will be used for inspecting the cooling towers.

>>> David Jeng 10/03/2007 2:21 PM >>>

I have reviewed the VY applicant's September 27, 2007 letter responding to staff RAI 2.4.4-2. Although, I have determined that the letter provided response generally consistent with what I have observed during my on site walkdown trip or information received from the VY site engineering staff, I believe the VY applicant should be requested to provide satisfactory response to the following questions to further support your effort of reaching a reasonable assurance of adequate safety conclusion:

1. VY applicant should provide an engineering analysis based justification for asserting that both C 2-1 and C 2-2 will maintain their structural integrity under the combined loading of design basis earthquake plus the hydrodynamic effect/load of the pouring water resulting from a joint rupture of the 60 " diameter fiber glass pipe unless the failure of the pipe joint under the design basis seismic load can be reasonably precluded.
2. The fact that failure did occur in C 2-4, which has been subject to the existing VY inspection program, does raise a concern that the similar failure could have occurred in C 2-1 and C 2-2 (the cells are basically of similar design). Therefore, VY applicant should reassess the current inspection program applicable to C 2-1/C 2-2, and determine if the program should be enhanced in terms of its inspection frequency/details etc, in order to reasonably preclude the occurrence of C 2-4 type unexpected failure.

Feel free to contact me if you have questions. Thanks.

David Jeng

**CC:** Laura Dudes; Sujit Samaddar

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**Subject:** Re: Additional RAI Recommended for Issuance to VY Applicant to Provide Response  
**Creation Date** 10/04/2007 12:30:52 PM  
**From:** David Jeng  
**Created By:** DCJ@nrc.gov

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