ESBWR COLA Technical Specification COL Holder Item Closure

TS Holder Item Closure: Objectives

- Confirm plan for addressing COL holder items in ESBWR Technical Specifications (TS) & TS Bases
- Obtain NRC feedback

TS Holder Item Closure: Background

- ESBWR DCD R5 TS and Bases contain COL holder items to be addressed after issuance of COLs
- ESBWR COLAs proposed that TS COL holder items be addressed as license condition
- ESBWR approach was consistent with RG 1.206 and SRP 16.0
- In September meeting, NRC stated that their position was being revised to require all TS COL items to be addressed prior to COL issuance

TS Holder Item Closure: Background

- ESBWR DCWG considered NRC's revised position, and developed approach to respond
- Recently, NRC issued COL/DC-ISG-8 to clarify position on resolution of all generic TS COL items before COL issuance
- NAPS RAI 16-1 provided additional NRC expectations regarding TS COL items

TS Holder Item Closure: Strategy

- TS and TS Bases will be revised to address each COL holder item using one of the following options:
 - Provide plant-specific value
 - Provide value that bounds plant-specific value, but by which the plant may be safely operated
 - Use the Plant TS Section 5.5.11, "Setpoint Control Program (SCP)"
- TS Bases and FSAR will contain supporting information, as applicable

Allowable Values

- Replace bracketed Allowable Values with: "In accordance with TS 5.5.11, Setpoint Control Program (SCP)"
- □ TS 5.5.11 refers to NEDE-33304P (in review by NRC)
 - TS will be revised after NRC issues SER to reflect NRC approval
- Affected Technical Specifications:
 - Various TS Section 3.3 Tables
 - SR 3.1.7.8, SR 3.7.1.9, SR 3.7.2.6, SR 3.7.6.6

- CRD Accumulator Pressure (Scram Operability)
 - Bounding values based on available ABWR design information
 - Affected Technical Specifications:
 - SR 3.1.5.1
 - SR 3.9.5.2

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Verify each control rod scram accumulator pressure is ≥ [12.76 MPaG (1850 psig)]

#### SRNM Minimum Count Rate for Operability

- Use "3 cps" based on ABWR and historically accepted SRNM minimum count-rate
- Affected Technical Specifications:
  - SR 3.3.1.6.3

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Verify count rate is \geq [3.0] cps

CRHAVS Filter Unit dP

- Bounding value
- Affected Technical Specifications:
 - **TS** 5.5.13.d

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Demonstrate for each of the ESF systems that the pressure drop across the combined HEPA filters, the prefilters, and the carbon adsorbers is less than the value specified ...

#### Battery Operating Limits / Monitored Parameters

- Use manufacturer's values for battery cell voltage and end-of-life capacity
- Affected Technical Specifications:
  - TS 3.8.3 Actions and Surveillances
  - TS 5.5.10.a

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- Verify each required battery pilot cell float voltage is ≥ [2.14] V
- With battery cell float voltage < [2.18] V, actions to restore cell(s) to ≥ [2.18] V and perform SR 3.8.3.5
- Verify each required battery capacity is ≥ [80]%

Bases Detailing Battery Fully Charged Condition

- Use manufacturer's recommended float current limits
- Affected Technical Specifications:
 - TS Bases 3.8.1, Action A
 - TS Bases 3.8.3, Action B
 - TS Bases SR 3.8.1.3

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... charging current has stabilized as indicated by three consecutive hourly current readings changing by < [0.5] amps ... Alternately, ... the float current is < [5.0] amps

### Battery Testing Flexibility

- Remove operational flexibility associated with Performance Discharge Test
- Affected Technical Specifications:
  - SR 3.8.1.3
  - SR 3.8.3.6

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The modified performance discharge test in SR 3.8.3.6 may be performed in lieu of SR 3.8.1.3

Battery Charger Design / Surveillance

- Use manufacturer's recommended battery charger test duration
- Affected Technical Specifications:
 - SR 3.8.1.2

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Verify each required battery charger supplies  $\geq$  rated amps at greater than or equal to the minimum established float voltage for  $\geq$  [4] hours

#### Pressure-Temperature Limits

- □ TS will include bounding curves to obtain COL
- □ LTR to support bounding curves (based on beltline) will be submitted 12/08
- □ PTLR methodology will not be included in TS (Methodology will be submitted in 1<sup>st</sup> quarter 2009 for future TS amendment— will cover all components)
- Affected Technical Specifications
  - TS 3.4.4 bounding curves will be included
  - TS 5.6.4 deleted

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RCS pressure, RCS temperature, and RCS heatup and cooldown rates shall be maintained within the limits specified in [the PTLR].

TS Holder Item Closure: Summary

- Plant TS will contain all site-specific information required to ensure plant operates within its design basis
- Plant TS Bases or FSAR will include supporting information, as required

TS Holder Item Closure

Questions/Feedback?