Accession No. ML083220972

From:	Peter Tam
Sent:	Monday, November 17, 2008 3:41 PM
To:	Jack Gadzala (jack.gadzala@dom.com); Thomas Breene (thomas.l.breene@dom.com); Craig Sly (craig.d.sly@dom.com)
Cc:	George Thomas (NRR); Robert Palla
Subject:	Kewaunee - Draft RAI on the PRA of proposed amendment re. extended ILRT interval (TAC MD9612)

Jack:

The PRA Licensing Branch (APLA) has reviewed Dominion Energy's risk analysis submitted in support of its request to extend the test interval for the Integrated Leakage Rate Test (ILRT) for Kewaunee Power Station. APLA has identified areas where additional information is needed to complete its review.

1. The baseline internal event core damage frequency (CDF) and large early release frequency (LERF) values used in the integrated leak rate test (ILRT) analysis (8.1E-5 per year and 9.9E-6 per year, respectively, based on PRA Version K107Aa dated July 2008) are about half the values reported in the recent Kewaunee severe accident mitigation alternative (SAMA) analysis (4.21E-5 per year and 4.86E-6 per year, respectively, based on PRA Version K101AASAMA dated May 2007). Provide a description of the major changes to PRA models and assumptions that account for these reductions.

2. Identify the version of the PRA subjected to the independent assessment performed in January 2008. Describe any assessment findings/issues in areas related to the aforementioned CDF and LERF reductions. Describe the resolution of these issues and the impact of any unresolved issues on the risk results for the requested change.

3. The fire LERF used in the ILRT analysis (3.18E-8 per year based on a December 2003 RAI response) is lower than the value reported in the SAMA analysis (4.90E-8 per year). Describe the evolution of the fire LERF value from the IPEEE to present. Justify the fire LERF value used in the ILRT analysis in view of the results from the most recent internal event and fire assessments.

Please contact me to set up a conference call where we will discuss disposition of these drat questions.

The sole purpose of this e-mail is to prepare you and others for the proposed conference call. **It does not formally request for additional information, and it does not convey a formal NRC staff position**.

Peter S. Tam, Senior Project Manager
Plant Licensing Branch III-1
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E-mail Properties

Mail Envelope Properties (C56E360E9D804F4B95BC673F886381E717F7B2E8F1)

Subject: Kewaunee - Draft RAI on the PRA of proposed amendment re. extended ILRT interval (TAC MD9612)
Sent Date: 11/17/2008 3:41:16 PM
Received Date: 11/17/2008 3:41:00 PM
From: Peter Tam

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Files	Size	Date & Time
MESSAGE	9818	11/17/2008

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Priority: olImportanceNormal
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Return Notification: False

Sensitivity: olNormal
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