

PMNorthAnna3COLPEmails Resource

From: Ronaldo Jenkins
Sent: Friday, February 27, 2009 1:57 PM
To: Mark Tonacci
Cc: Thomas Kevern; Michael Eudy; Dennis Galvin; Jeffrey Cruz; Stephanie Coffin; Laura Dudes; Amar Pal; NorthAnna3COL Resource
Subject: RE: Electrical GDC Questions - North Anna
Attachments: RESPONSE TO NEI 011209.doc; RE: Offsite power update

Mark,

The basis for the GDC 2 and 4 decision is described in ML090260030 (one of your attachments). I attached DE's one pager that we used during the Division Director's Meeting on this topic. EEB had developed narrower supplemental RAIs to develop a technical basis for disposition purposes but the decision was made not to send them out (I had discussed this approach with Stephanie and Jeff -see attached e-mail).

The good news is that the number of open items is down to a very manageable level - 3 for Chapter 8 and 1 for Chapter 14 so I am comfortable going to ACRS with the SE w/ OI (This statement is preliminary because I have not had a chance to review and comment on Rev. 1 SE w/OI). The November 2008 Rev. 0 SE w/OI had 11 open items.

Given that this call is for North Anna issues only then the larger DCWG 'departure from GDC 17' approach will not be discussed. I do not know what we need to discuss about the GDCs since the decision has been made for GDC 2 and 4 but I will be glad to talk about GDC 5. Please give me a call on Monday and we can discuss this matter further.

Thanks for all of your hard work bringing this together.

Ronaldo

From: Mark Tonacci
Sent: Friday, February 27, 2009 10:20 AM
To: Ronaldo Jenkins
Cc: Thomas Kevern; Michael Eudy; Dennis Galvin; Jeffrey Cruz; Stephanie Coffin; Laura Dudes; Amar Pal; NorthAnna3COL Resource
Subject: Electrical GDC Questions - North Anna

Ronaldo,

As you know by now - we are "on" for the ESBWR call for Tuesday at 11:15 and Tom K sent the calendar appointment. The purpose of the call is to define where we disagree on the issues and clearly define them in preparation for a public meeting. If we can close the issues - all the better. There are no Design Cert issues in this area - only the COLA.

Below you will see a request from North Anna (RCOL) in preparation for the call asking for the basis of the management decision for the GDCs. I do not have the basis for the GDC 2/4 or 5 decision. Do you have it or can you get it from Laura and send to me so I can forward to North Anna?

Also attached is background material for your review prior to the call:

1. Excel file showing the 4 open RAIs to discuss,
2. North Anna RAI responses that we did not deem satisfactory for questions 8.02-16, 27, 29, and 33,
3. Staff open RAI on 8.02-33 (8.02-16 Supplement 1)
4. Staff open RAIs on 8.02 questions 38 (27S1) and 39 (29S1)
5. Staff open RAI on 14.03.06 question 1 (preliminary response given in DCWG -is it OK?)

6. Management GDC decision,
7. Industry position on GDCs.

As I told North Anna - I want to focus on the GDC issues first. Although we will likely have a room full on Tuesday, I assume you will do most of the talking and I will facilitate. My counterpart at North Anna will attempt to do the same.

Let's hope we have a productive call. Do you need anything more from me??

Mark

From: Regina.Borsh@dom.com [mailto:Regina.Borsh@dom.com]
Sent: Thursday, February 26, 2009 7:01 PM
To: Mark Tonacci
Cc: NorthAnna3COL Resource; John Disosway; Tom Hicks; Marc Hotchkiss; Spence Semmes; Joe Hegner; Norm Peterson; bugocill@dteenergy.com; Lashawn Green; John Hayden; Thomas Kevern
Subject: Re: Electrical GDC Questions

Thanks for the list, Mark.

We'd like to discuss all four RAIs that you consider open:

GDC 5 applicability (RAIs 8.2-33): In order to discuss GDC 5, we would like to know the basis for the NRC's decision that GDC 2 and 4 are not applicable. If possible, could you please provide this information to us before the call, so that we can review it?

Impact of U3 trip on switchyard (RAI 8.2-38): We'd like to know what level of detail is being requested.

Underground cable and testing (RAI 8.2-39): We do not have any operating experience that indicates that this is an issue for high voltage cable. We'd like to review the data that supports your statement.

Offsite power ITAAC (RAI 14.3.6-1): Our RAI response will provide essentially the same ITAAC that we presented in the NRC - DCWG meeting on this topic, with some modifications of the terms onsite and offsite power (vs. PPS). In our call, we'd like to know if you have any comments on the proposal we presented in the meeting.

Please let me know if you have any questions on the above.

Thanks,

Gina

From: Mark Tonacci [Mark.Tonacci@nrc.gov]
Sent: 02/26/2009 12:52 PM EST
To: Regina Borsh
Cc: NorthAnna3COL Resource <NorthAnna3COL.Resource@nrc.gov>
Subject: Electrical GDC Questions

Ginna,

Attached is a list of 4 RAIs on offsite power (8.2) that are currently open for North Anna. I think only the first two are related to the GDC issues we have been working on.

Please take a look at the list and let me know which ones you think are related to the escalated GDC issues we are working on and where we may not be in agreement. I do not mind discussing others but want to focus first on the tough issues we have been discussing for months. I am optimistic that you will say we only have 1 or 2 RAIs to discuss.

Please let me know as soon as you can so we can both prepare for Tuesday's 11:15 call.

Mark

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Email Number: 673

Mail Envelope Properties (CEEA97CC21430049B821E684512F6E5EB70A7D1930)

Subject: RE: Electrical GDC Questions - North Anna
Sent Date: 2/27/2009 1:56:50 PM
Received Date: 2/27/2009 1:56:54 PM
From: Ronaldo Jenkins

Created By: Ronaldo.Jenkins@nrc.gov

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Files	Size	Date & Time
MESSAGE	6100	2/27/2009 1:56:54 PM
RESPONSE TO NEI 011209.doc		36858
RE: Offsite power update	15622	

Options

Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received:

RESPONSE TO NEI ON APPLICABILITY OF GDC 2, 4 and 5 TO THE OFFSITE POWER SYSTEM (OPS)

Office of New Reactors
Division of Engineering
Electrical Engineering Branch

Issue	Assertion that the recent revision of SRP Chapter 8 constitutes an unwarranted change in the NRC staff's position and is inconsistent with the NRC's previous position on the applicability of GDC 2, 4 and 5 to the OPS.
Background	The staff has been requesting the DC/COL applicants to address questions to demonstrate that the OPS designs meet GDC 17 by citing GDCs 2, 4 and 5 to address design-preventable hazards (e.g. propane tank farm near offsite power lines) which may affect OPS performance.
Safety Significance	<p>The OPS and the emergency onsite power system (EOPS) together constitute under GDC 17 the systems necessary to provide electric power for safe operation and accident mitigation. The OPS is a non-Class 1E system that is electrically connected to the design and performance of the EOPS. Operating experience has shown that a reliable OPS is important to the safe operation of nuclear power plants.</p> <p>The DCD for the AP 1000 and ESBWR have deferred significant responsibility for the OPS to the COL Holder. This responsibility includes a number of interface criteria that must be met in order for the OPS to function together with the EOPS in accordance with GDC 17. As an example of an important interface criterion, an AP 1000 COL Action Item specifies that the grid (i.e., OPS) will remain stable and the reactor coolant pump bus voltage will remain above the voltage necessary to maintain the flow assumed in the Chapter 15 analyses for a minimum of 3 seconds following a turbine trip.</p>
Discussion	<p>Several operating plant FSARs cite compliance with GDC 2, 4 or 5 as applicable to the OPS. The subject operating plants did not have to meet design requirements significantly different from that proposed by COL Applicants for passive plants. Specifically, they did not have to meet a requirement that their OPS withstand earthquakes, tornados, hurricanes, etc.</p> <p>Although SRP Section 8.2, Revision 3, contains materially the same guidance to the staff as stated in Revision 4 to address design preventable failures and hazards for the OPS, better clarification is needed to avoid further misunderstanding on this topic.</p>
Recommendations	The staff will withdraw those RAIs which reference GDC 2, 4 or 5. Any new RAI will explicitly request specific information that is needed in order to determine the acceptability of the design in accordance with GDC 17.