

EAL draft RAIs.txt

From: Jason Paige
Sent: Thursday, February 26, 2009 2:15 PM
To: Bob_Tomonto@fpl.com
Cc: Si va Li ngam
Subject: EAL draft RAIs
Attachments: Turkey Point_EAL_Upgrade_RAIs - DRAFT.DOC

Bob, attached are the draft RAIs for the EAL submittal. Please review and notify me when TP is ready to discuss with the NRC.

Thank you,
Jason

Received: from HQCLSTR02.nrc.gov ([148.184.44.77]) by TWMS01.nrc.gov ([148.184.200.145]) with mapi; Thu, 26 Feb 2009 14:15:29 -0500
Content-Type: application/ms-tnef; name="winmail.dat"
Content-Transfer-Encoding: binary
From: Jason Paige <Jason.Paige@nrc.gov>
To: "Bob_Tomonto@fpl.com" <Bob_Tomonto@fpl.com>
CC: Si va Li ngam <Si va.Li ngam@nrc.gov>
Date: Thu, 26 Feb 2009 14:15:27 -0500
Subject: EAL draft RAIs
Thread-Topic: EAL draft RAIs
Thread-Index: AcMYRpV3YPIQ/qd0SHSgFd0Za8VRJA==
Message-ID: <DC2088DF7F51A8499309AA4A35D0C1E01CEF81AF1B@HQCLSTR02.nrc.gov>
Accept-Language: en-US
Content-Language: en-US
X-MS-Has-Attach: yes
X-MS-Exchange-Organization-SCL: -1
X-MS-TNEF-Correlator: <DC2088DF7F51A8499309AA4A35D0C1E01CEF81AF1B@HQCLSTR02.nrc.gov>
MIME-Version: 1.0

Turkey Point
 NRC Request for Additional Information (RAI)
 DRAFT

RAI #	EAL	Question
	GENERIC	<p>It is expected that licensee's adhere to endorsed guidance, particularly for Initiating Conditions and Definitions, with no differences or deviations other than those related to a licensee's particular design. This is to ensure regulatory stability of the EAL scheme by enforcing the expectation that licensees adhere to NRC reviewed and endorsed guidance with no non-design related deviations and little to no differences.</p> <p>This also ensures that, as stated in 10 CFR 50.47(b)(4), licensees implement a "...standard emergency classification and action level scheme...."</p> <p>While the NRC is not enforcing strict verbatim compliance with the endorsed guidance, where applicable, the NRC will be pointing out areas where we expect compliance with the endorsed guidance to ensure implementation of a standard scheme. This is primarily based upon industry and NRC experience with issues related to the particular EAL.</p>
	BASES INFORMATION	<p>Staff has noted discrepancies between the proposed Bases Information wording and the endorsed Bases Information wording. Incorporate the endorsed wording to ensure a standard emergency classification and action level scheme or provide detailed justification for not doing so in each case.</p>

Turkey Point
NRC Request for Additional Information (RAI)
DRAFT

RAI	EAL	Question
1	ATT. 6	<ol style="list-style-type: none"> 1. Add the Fission Barrier Matrix to the list of discretionary EALs found in the last paragraph dealing with multiple events and emergency class upgrading. 2. Follow the expectations as stated in the endorsed guidance to ensure a standard emergency classification and action level scheme or provide detailed justification for not doing so in each case. All of the parts of Attachment 6 are, for the most part, inconsistent with the endorsed guidance. Use the endorsed guidance, or provide additional information to support the staff's consideration of these deviations. For consistency, it is expected that licensees adopt the intent, if not the exact wording, of the endorsed guidance for all of Attachment 6. 3. The 3rd paragraph of the "Multiple Events..." section requires additional justification to support the deviation. Explain how the regulatory requirements would be met if one unit is at a GE when the other unit meets the criteria for a GE (separate events); how would this be declared and how would a classification downgrade for the unit that declared the GE impact the unit that still meets the criteria for a GE but never actually declared it? 4. This attachment is inconsistent with Sections 3.10, 3.11, and 3.12. Explain the inconsistency or revise to ensure a standard emergency classification and action level scheme or provide detailed justification for not doing so in each case.
2	SECT 3.5	Incorporate information from NEI 99-01 R5 related to the digital I&C example.
3	SECT 3.9	The first paragraph is not in accordance with NEI 99-01 R5. Remove this paragraph and replace it with the 1 st paragraph of Section 3.9 from NEI 99-01 R5 to ensure compliance with the standard emergency classification and action level scheme.
4	SECT. 5.2	<ol style="list-style-type: none"> 1. Add the definition for "Extortion," "Hostage," "Intrusion," "Sabotage," and "Strike Action" to ensure compliance with the standard emergency classification and action level scheme. 2. Is the term "power block" defined in your FSAR? In addition, this term is too all encompassing for effective use in the EALs. In addition, this term appears to be inconsistently used throughout the document. Staff expects area determination to be consistent with the endorsed guidance without adding any other areas that may lead to unnecessary EAL declarations. 3. For the terms "Containment Closure" "Protected Area," and "Vital Areas," use your site-specific definition, not the generalized wording from NEI 99-01 R5.
5	SECT 5.3 (NEI)	Incorporate Section 5.3 from NEI 99-01 R5 to ensure adequate understanding.

Turkey Point
NRC Request for Additional Information (RAI)
DRAFT

6	RU1	Add 3 rd paragraph from endorsed EAL basis to ensure compliance with the standard emergency classification and action level scheme.
7	RA1	<ol style="list-style-type: none"> 1. Value and time in RA1.3 is incorrect; it should be "...200 times..." and "...15 minutes..." please correct this error. The justification matrix you provided has the correct information. 2. Add 3rd paragraph from endorsed EAL basis to ensure compliance with the standard emergency classification and action level scheme. 3. For PRMS-R-14, PRMS-3(4)-R-15, PRMS R-18 and PRMS-3(4)-R-19: How do you differentiate between "Off scale High" and instrument failure? 4. RAI values are expected to be 100X greater than the RU1 values. Explain why this is not the case for your RU1/RA1. Either correct the values or ensure the IC wording is consistent with how you plan to implement these EALs.
8	RA3	Explain why you added the TSC and SAS? Are these areas requiring continuous occupancy that, if evacuated, would impede operation of systems required to maintain plant safety functions or perform a safe shutdown? Fully justify their inclusion or remove to ensure compliance with the standard emergency classification and action level scheme.
9	RS1 RG1	For PRMS-R-14 and PRMS-3(4)-R-15: How do you differentiate between "Off scale High" and instrument failure?
10	CU1	Add the endorsed information related to relief valves to ensure compliance with the standard emergency classification and action level scheme.
11	CU2	<ol style="list-style-type: none"> 1. The threshold numbering goes from (1), to (1), to (2). Please explain the numbering convention used for this EAL, or revise the apparent error. In addition, the Bases information will need to be revised accordingly. 2. Use the wording from the endorsed guidance in the Bases information, particularly paragraph 2, to ensure compliance with the standard emergency classification and action level scheme.
12	CU3	Use the wording from the endorsed guidance in the Bases information to ensure compliance with the standard emergency classification and action level scheme.
13	CU4	Remove the word "Unplanned" from threshold 2 to ensure compliance with the standard emergency classification and action level scheme.
14	CU6 SU6	Is the LGR system a viable method for communicating with the NRC? If not, justify its inclusion on this list or remove it.

Turkey Point
NRC Request for Additional Information (RAI)
DRAFT

15	CU7	<ol style="list-style-type: none"> 1. Remove the word "Unplanned" from the IC to ensure compliance with the standard emergency classification and action level scheme. 2. How was "...ANY 2..." determined to be an acceptable alternative to the expectation that the site-specific busses be listed? Justify or revise accordingly to ensure compliance with the standard emergency classification and action level scheme.
16	CA4	<ol style="list-style-type: none"> 1. The expectation is to adhere to the defined EAL threshold as defined in the endorsed guidance for CA4.1. Justify why consideration should be given for the proposed deviation or revise to ensure compliance with the standard emergency classification and action level scheme. 2. Is the 10-psi value in CA4.2 within the calibrated range of the instrumentation used in these operating modes? What are the scale markings for these indicators?
17	CS1	<p>Verify that the stated level values are equivalent to the expected values from the endorsed guidance. Specifically address the values and the indicators stated, in particular, explain why the EAL thresholds are limited to specific indicators.</p>
18	CG1	<ol style="list-style-type: none"> 1. The expectation is for the value in CG1.1a to be the same as CS1.2. Explain why consideration should be given for this deviation from the standard emergency classification and action level scheme as endorsed. 2. Explosive mixture in containment is an expected criterion for indications of containment challenges. Explain, in greater detail, why consideration should be given for this deviation. Your justification (Att 14) stated that the exemption would be handled separately; however, the staff cannot find this exemption. In addition, the stated amendment changed the equipment classification to RG 1.97 Cat 3 (from Cat 1), but does not allude to this equipment being unavailable. In addition, pg 2 of the Safety Evaluation (paragraph 4) still states the basis for the H2 monitors (ADAMS Accession No. ML013550500). In summary, the staff finds no regulatory basis for allowing this deviation, please provide more detailed explanation to justify its exemption, or revise to ensure compliance with the standard emergency classification and action level scheme.

Turkey Point
NRC Request for Additional Information (RAI)
DRAFT

19	FB MATRIX	<ol style="list-style-type: none"> 1. The note at the bottom of the IC Matrix is not needed if the logic flow diagram is implemented at the site. 2. For Cont Barrier PL2: Explosive mixture in containment is an expected criterion for indications of containment challenges. Explain, in greater detail, why consideration should be given for this deviation. Your justification (Att 14) stated that the exemption would be handled separately; however, the staff cannot find this exemption. In addition, the stated amendment changed the equipment classification to RG 1.97 Cat 3 (from Cat 1), but does not allude to this equipment being unavailable. In addition, pg 2 of the Safety Evaluation (paragraph 4) still states the basis for the H2 monitors (ADAMS Accession No. ML013550500). In summary, the staff finds no regulatory basis for allowing this deviation, please provide more detailed explanation to justify its exemption, or revise to ensure compliance with the standard emergency classification and action level scheme. 3. For RCS Barrier PL1: Explain why "...maximum charging..." is equivalent to "...one charging pump...", or revise to ensure compliance with the standard emergency classification and action level scheme. 4. For Fuel Clad Barrier PL1: This level seems inconsistent with other EAL thresholds that use a value equivalent to TOAF. Explain the inconsistency or revise all applicable thresholds to ensure compliance with the standard emergency classification and action level scheme. 5. Provide more justification to explain why you do not have any thresholds for #7 (from the endorsed guidance). It is expected that licensees adopt thresholds that equate to loss or potential loss of the applicable fission barrier. The endorsed guidance intends for licensees to provide other indicators here, or provide additional justification detailing the considerations that went into the decision to not add additional indicators. 6. For RCS Barrier PL1 bases: Incorporate the language from the endorsed guidance to ensure compliance with the standard emergency classification and action level scheme. 7. For Cont Barrier PL2, L2, and language for #4 bases: Incorporate the language from the endorsed guidance to ensure compliance with the standard emergency classification and action level scheme.
20	HU1	<ol style="list-style-type: none"> 1. HU1.1: Explain how the first criteria would work to ensure a timely EAL declaration. Is this available in the control room without any operator/technician interaction? 2. HU1.2: Is 145 mph within the calibrated range of the instrumentation used to measure wind speed? 3. Where is the internal flooding threshold? Provide additional justification for its removal, or revise to ensure compliance with the standard emergency classification and action level scheme. 4. The bases information for threshold #4 needs to be specific to your site, not a regurgitation of the generic information from the endorsed guidance.

Turkey Point
NRC Request for Additional Information (RAI)
DRAFT

21	HU2	<ol style="list-style-type: none"> 1. Add the note from the endorsed guidance to ensure compliance with the standard emergency classification and action level scheme. 2. See RAI related to use of the term “power block” and justify its use in this EAL.
22	HU4	Add the note from the endorsed guidance to ensure compliance with the standard emergency classification and action level scheme.
23	HA1	<ol style="list-style-type: none"> 1. HA1.1: Explain how the first criteria would work to ensure a timely EAL declaration. Is this available in the control room without any operator/technician interaction? Where is the wording related to indication of degraded performance? Provide additional justification for its removal, or revise to ensure compliance with the standard emergency classification and action level scheme. 2. HA1.2: Is 145 mph within the calibrated range of the instrumentation used to measure wind speed? 3. HA1.3: Explain why you did not use the term Vital Areas as expected from the endorsed guidance. If sufficient justification is given to allow the staff to reach a similar conclusion, explain why these are the only two areas listed for this threshold, particularly given the bases for the threshold as defined in the endorsed guidance. 4. HA1.4 and HA1.5: See RAI related to use of the term “power block” and justify its use in this EAL. 5. Explain in greater detail why a threshold for turbine failure is not provided in this EAL or revise to ensure compliance with the standard emergency classification and action level scheme. 6. The bases numbering is inconsistent with the actual EAL numbering, correct the discrepancies. In addition, the bases information uses the term “vital areas” whereas the actual threshold uses “power block”, correct the discrepancies (staff prefers the use of the term “vital areas” to ensure consistency in implementation of the endorsed guidance, however, licensees can provide justification for the deviation for staff review).
24	HA2	<ol style="list-style-type: none"> 1. See RAI related to use of the term “power block” and justify its use in this EAL. 2. The expectation is for a specific list of areas this EAL would be applicable to. Justify the deviation or revise to ensure compliance with the standard emergency classification and action level scheme.
25	HA3	<ol style="list-style-type: none"> 1. While the use of the term “vital areas” meets the staff’s expectations, it does highlight the inconsistency in the use of this term versus “power block” in the proposed EAL scheme. 2. Add the note from the endorsed guidance to ensure compliance with the standard emergency classification and action level scheme. 3. Add paragraphs #3 and #4 from the endorsed guidance to ensure compliance with the standard emergency classification and action level scheme.

Turkey Point
NRC Request for Additional Information (RAI)
DRAFT

26	HA4	<ol style="list-style-type: none"> 1. Add the note from the endorsed guidance to ensure compliance with the standard emergency classification and action level scheme. 2. Incorporate the bases wording from the endorsed guidance for threshold #1 to ensure compliance with the standard emergency classification and action level scheme.
27	HS2	<ol style="list-style-type: none"> 1. Incorporate the bases information from the endorsed guidance into paragraph #1. 2. Explain how “Emergency Coordinator” equates to “ED” as stated in the 4th paragraph of the bases.
28	ALL “S” IC’S	The header is incorrect for all the “S” Initiating Conditions, correct the errors.
29	SU3 SA4 SS6	<ol style="list-style-type: none"> 1. Provide additional justification for the removal of thresholds/bases information related to “indication” as this is an expectation from the endorsed guidance. 2. Incorporate the rest of the bases information from the endorsed guidance to ensure compliance with the standard emergency classification and action level scheme. 3. [SA4/SS6 only] Why define “significant transient” in the Definitions section, then define it again in this EAL?
30	SA2 SS2	<ol style="list-style-type: none"> 1. In order to ensure consistency and compliance with 10 CFR 50.47(b) (4) for a “...standard emergency classification and action level scheme...” provide additional justification to support the deviations in this EAL, including the bases wording. In particular, justify why you do not use the term “reactor control console,” or the equivalent for your site. It is not the expectation to allow all action(s) in the control room to suffice for this EAL. Incorporate the wording from the endorsed guidance, or provide additional justification to support the staff’s consideration of this deviation. 2. Provide more information related to the suitability of “CSF Status Tree Subcriticality – Red Conditions Met” and why you feel it is acceptable for use in this EAL. 3. Incorporate the rest of the bases information from the endorsed guidance to ensure compliance with the standard emergency classification and action level scheme.
31	SA5	<ol style="list-style-type: none"> 1. Explain why you use the term “station blackout” in the IC and “unit blackout” in the EAL. 2. Explain why you incorporated guidance related to SBO crossties in this EAL and not in SU1, what procedure controls this crosstie activity, and why is it not referenced in this EAL. 3. Incorporate the rest of the bases information from the endorsed guidance to ensure compliance with the standard emergency classification and action level scheme.

Turkey Point
NRC Request for Additional Information (RAI)
DRAFT

32	SS1	Explain why you incorporated guidance related to SBO crossties in this EAL and not in SU1, what procedure controls this crosstie activity, and why is it not referenced in this EAL.
33	SG1	The "8 hours" for buss restoration is higher than the typical time frame for this EAL. Provide additional justification for the acceptability of this value in this EAL.
34	SG2	Paragraphs #2 and #3 in the bases section is not applicable for this EAL and needs to be removed to ensure compliance with the standard emergency classification and action level scheme.