

From: Tam, Peter
Sent: Thursday, July 02, 2009 2:37 PM
To: 'Pointer, Kenneth'; 'Gunderson, Lynne'; 'Salamon, Gabor'
Cc: Naeem Iqbal
Subject: Monticello Extended Power Uprate - An open issue in the draft SE re. fire protection (TAC MD9990)

Ken:

Our Fire Protection Branch reviewer was reviewing your 5/13/09 response to an RAI, and found that some information is lacking for him to complete his draft safety evaluation. Thus, the pertinent paragraphs of the draft now reads (below in *blue*):

In RAI # 3, the staff noted that Enclosure 5 to L-MT-08-052, Section 2.5.1.4, "Fire Protection," states that the Appendix R fire event was analyzed for the two cases at EPU conditions. The licensee stated that the operator actions required to mitigate the consequences of a fire are not affected nor is there a need for any new operator actions. The staff requested the licensee to verify that additional heat in the plant environment from the EPU will not (1) interfere with required operator manual actions being performed at their designated time, or (2) require any new operator actions. By letter dated May 13, 2009, the licensee provided following response.

The licensee indicated that there are no new operator actions required as a result of the proposed EPU to mitigate the Appendix R fire event, and the existing assumptions for the timing of the required operator actions during an Appendix R event were not changed for EPU. Further, the licensee stated that the governing procedure for operator actions during an Appendix R event is Abnormal Operating Procedure C.4-C, "Shutdown Outside of the Control Room." The remote shutdown is accomplished at Alternate Shutdown System (ASDS) Panel C-292 on the third floor of the EFT Building, which is accessed via the Plant Administration Building. The operator actions to place the reactor in a cold shutdown condition are performed at this panel. The EPU does not present conditions that interfere with or change the operator actions necessary to achieve cold shutdown for the Appendix R event.

The licensee's response partially addresses the staff's concerns. For the EPU condition, the licensee updated the fire safe-shutdown analysis. The licensee identified that the proposed EPU does not present conditions that interfere with or change the operator actions necessary to achieve cold shutdown for the Appendix R event. The staff noted that, the licensee did not identify conditions that interfere with or change the operator actions necessary to achieve and maintain hot shutdown for the Appendix R event. Based on its review, the licensee's response to RAI # 3 partially acceptable.

Please set up a conference call with me to discuss how we can resolve this apparent discrepancy. **The sole purpose of this e-mail is to prepare you and others for the requested conference call. This e-mail does not formally request for additional information, and does not convey a formal NRC staff position.**

Peter S. Tam

Senior Project Manager
(for Kewaunee and Monticello)

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