

From: Poole, Justin
Sent: Wednesday, September 09, 2009 2:00 PM
To: 'Hale, Steve'; COSTEDIO, JAMES
Subject: Draft discussion topics from Reactor Systems regarding Alternate Source Term

Steve,

I was contacted by the Reactor Systems reviewer for the AST and he would like to discuss, if possible, the items below during tomorrows call 10am call.

This e-mail aims solely to prepare you and others for the proposed conference call. It does not convey a formal NRC staff position, and it does not formally request for additional information.

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#### DRAFT

The following are in reference to the analysis of SG Overfill during an SGTR (Question 3 response in letter dated June 1, 2009). The issues are as follows.

- (1) the analysis does not consider the limiting single failure
- (2) the analysis uses nominal initial plant conditions
- (3) it does not apply increased conservatism on initial SG secondary mass
- (4) what is the effect of the loss-of-offsite power on the margin of the SG overfill
- (5) what are the bases for the operator actions and required times in Table 1
- (6) how is the plant cooled down and depressurized from the full power conditions to the safe shutdown conditions? what are the systems or components and their associated qualifications (safety or nonsafety grade) for consequence mitigation? discuss the need of inclusion of the mitigation systems in the TS in meeting the 10 CFR 50.36(d)(2)(ii)(C) requirements
- (7) what is the role of the PORV in the intact SG for plant cooldown and depressurization? what is the contingency plan if the SG PORV is credited for intact SG cooldown but fails to achieve its designed function?
- (8) list all the conservative assumptions used in the analysis that assures a minimum margin to SG overfill.

DRAFT