

San Onofre Nuclear Generating Station (SONGS)
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.</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 the endorsed guidance to be used to ensure implementation of a standard scheme. This is primarily based upon industry and NRC experience with issues related to the particular EAL.</p> <p>While formatting is usually not technically relevant to the staff's review of EALs, when inconsistent formatting may result in potential misunderstanding, an RAI will be developed to correct the formatting or to obtain additional information in support of the deviation.</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> <p>Staff noted that differences and deviations made by SONGS to the Bases Information were not consistently highlighted nor justified.</p>
1	GENERAL	<p>Verify that all stated values, set points, and indications provided are within the calibrated range of the applicable instrumentation. Offscale high or low thresholds are not within the calibrated range of instrumentation.</p>
2	SECT 1.0	<p>While no specific section in NEI 99-01 R5 documents the purpose of the EAL Technical Bases Document (EAL TBD), it can be implied from statements made in Sections 4.2, 5.1, and particularly 5.3. Revise the purpose statement in SONGS Section 1.0 to align with NEI 99-01 R5 or provide justification why this is not necessary.</p>
3	SECT 3.0	<p>The staff requests that the ADAMS Accession Number of ML080450149 is used to reference NEI 99-01 R5 to ensure that the multiple draft copies of this document that are in ADAMS are not inadvertently referenced. Please revise Section 3 to reference this ADAMS Accession Number</p>
4	SECT 4.0	<p>It is expected that definitions are to be verbatim to the endorsed guidance to ensure implementation of a standard emergency classification and action level scheme. Revise Section 4 to include CIVIL DISTURBANCE and ISFSI or provide justification why this is not necessary.</p>

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5	AU1.1 AA1.1 AS1.1 AG1.1	<ol style="list-style-type: none"> 1. What is the timeframe for obtaining the readings from the Remote Display Unit (RDU) on Radiation Monitoring Panel 2/3L104 and the Wide Range Radiation Monitoring System Panel, 2/3L405 for event classification? 2. Could access to these panels be impacted by a radiological release in progress, therefore impacting the ability to classify an event?
6	AU1.2 AA1.2	The inclusion of the statement "...divided by the applicable administrative factor..." requires additional information to justify the deviation. The intent of this EAL is to make a declaration when the ODCM limit is exceeded by the stated amount. Provide more detailed information for the staff to review or justify why this is not necessary
7	AU2.1	It is expected that this EAL AU2.1 would include the listing of ARMs. Provide the site-specific list of ARMs or justify why this is not necessary.
8	TABLE A-2	Should Table A-2 include Monitor 2/3RE7813?
9	CU6.1 SU6.1	Provide detailed justification to support the inclusion of the "Two-Way Radio System" to the list of on-site communication methods, in particular, explain how this system will maintain effective communication between the CR, TSC, and the plant or justify why this is not necessary.
10	CU6.2 SU6.2	Provide detailed justification to support the inclusion of the "Two-Way Radio System, SOES Blue Phone, and Facsimile Machines" to the list of off-site communication methods, in particular, explain how these systems will maintain effective communication between site and the NRC.
11	CA1.1	Explain how you differentiate between "Offscale low" and instrument failure. Provide more supporting justification for this deviation.
12	CA4.2	Explain where this 10-PSI value is read, and if it is within the calibrated range of the instrumentation used. Note that only indications within the calibrated range, and no less than ½ of the scale graduation (marking), are considered acceptable for analog instrumentation.
13	CS1.1	Explain why you state HJTC #7 as being chosen in the EAL TBD when you have selected HJTC #8 in the EAL.
14	CG1.1 CG1.2	The EAL TBD provides 60 PSIG as a condition associated with a challenge to containment integrity when in fact it is ANY unplanned rise in Containment pressure that is one of the indicators of Containment challenge. It is unclear to the staff whether or not the 60 PSIG is the EAL threshold for these EALs. Provide more detailed information on whether it is the unplanned rise in Containment pressure or 60 PSIG Containment pressure for declaration of these EALs.
15	FISSION BARRIER MATRIX	Explain why you did not use safety function acceptance criteria in the FB Matrix as indications of barrier loss or potential loss. While the staff agrees that you cannot implement indicators based upon CSFSTs, it is expected that you develop indicators using criteria applicable to your design.

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16	HU1.1 HA1.1 (Q2)	<ol style="list-style-type: none"> 1. This EAL is intended to be declared based upon "...any two of the following..." three conditions, and it is stated this way in the EAL. However, the EAL TBD states that it is based upon the annunciator and control room operators agreeing they felt the seismic event. This is not the staff's expectation. The expectation is that ANY two of the three indicators being met qualifies this EAL for declaration. Revise the EAL TBD or provide sufficient site-specific justification to support the deviation. 2. Explain the paragraph in the EAL TBD that discusses the Operator or STA being dispatched to the seismic instrumentation to analyze the data. What impact does this have on the timing of the EAL? Provide justification to support this deviation.
17	HU1.2 HA1.2	<p>The EAL TBD states," Displays on CFMS and RADDPOSE-V accept 0.5 - 125 MPH. The real-time indication DDR10 chart recorder and display in the Control Room hallway are limited to 0 - 50 MPH."</p> <ol style="list-style-type: none"> 1. What is the timeframe of obtaining the wind speed >100 for classification purposes? 2. Where are the CFMS and RADDPOSE-V displays located and are they functional at all times?
18	HU4.1 HU4.2	<p>These EALs are not consistent with NEI 03-12 and Regulatory Guide 5.54. The guidance provided in these documents was developed to ensure timely and accurate communications between Security Shift Supervision and the Control Room. Revise to incorporate the endorsed wording to ensure a standard emergency classification and action level scheme or provide detailed justification for not doing so.</p>
19	HU4.1 HU4.2 HU4.3	<p>Insert the note from the endorsed guidance related to communication between the Control Room and Security or provide justification why this is not necessary.</p>
20	HU5.1	<p>Revise the last paragraph to incorporate the endorsed wording to ensure a standard emergency classification and action level scheme or provide detailed justification for not doing so.</p>
21	HA1.5	<p>Explain the deviation in the EAL TBD related to the types of vehicle crashes this EAL is applicable to, specifically, planes, helicopters and barges. How will these be differentiated from security events?</p>
22	HA1.6	<p>The EAL TBD states the specific severe weather of concern for this EAL. The staff expects this information to be contained in the EAL, revise accordingly.</p>
23	HA2.1	<p>Incorporate the EAL TBD information related to "visible damage' from the endorsed guidance to ensure a standard emergency classification and action level scheme or provide detailed justification for not doing so.</p>

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24	HG1.1	This EAL deviation is not adequately supported by the justification provided. The staff expects adoption of the endorsed guidance to ensure a standard emergency classification and action level scheme or provide detailed justification for not doing so.
25	SU5.2	Incorporate the EAL TBD information related to 'relief valve' operation or provide detailed justification for not doing so.
26	SA2.1 SS2.1 SG2.1 (Q2, Q3)	<ol style="list-style-type: none"> 1. Only actions immediately available to the Operator are considered 'manual actions' for this EAL. Revise the EAL and EAL TBD to incorporate the endorsed wording to ensure a standard emergency classification and action level scheme or provide detailed justification for not doing so. 2. Explain how 4.65% power was calculated (provide the approved calculation or technical specification) and what instrumentation is capable of reading this specific value. Explain why 5% is not used as this is the power level for your operating mode transition. 3. The EAL TBD information related to manual actions and what is, or is not, considered, is not applicable to this EAL. Remove this information from the first paragraph in the EAL TBD or provide detailed justification for not doing so.