

PMComanchePeakPEm Resource

From: Monarque, Stephen
Sent: Monday, October 05, 2009 2:30 PM
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Cc: Takacs, Michael; ComanchePeakCOL Resource
Subject: Comanche Peak RCOLA - Section 16.1 - RAI # 120
Attachments: RAI 3834 (RAI 120).doc

The NRC staff has identified that additional information is needed to continue its review of the combined license application. The NRC staff's request for additional information (RAI) is contained in the attachment. Luminant is requested to inform the NRC staff if a conference call is needed.

This is a supplement to RAI Number 91. Therefore, the response to this RAI should be provided as part of your response to RAI Number 91.

thanks,

Stephen Monarque
U. S. Nuclear Regulatory Commission
NRO/DNRL/NMIP
301-415-1544

Hearing Identifier: ComanchePeak_COL_Public
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Request for Additional Information (RAI) No. 3834

RAI # 120

10/5/2009

Comanche Peak Units 3 and 4
Luminant Generation Company, LLC.
Docket No. 52-034 and 52-035
SRP Section: 16 - Technical Specifications
Application Section: 16.1

QUESTIONS for Technical Specification Branch (CTSB)

16-17

By letter dated September 29, 2009, the NRC staff sent RAI letter No 91 (3315) to Luminant. In question 16-16 (13138) of RAI No. 91, the NRC staff discussed Interim Staff Guidance (ISG) Document DC/COL-ISG-8, 'Necessary Content of Plant-Specific Technical Specifications When a Combined License is Issued,' dated December 9, 2008. This ISG stated that combined license applicants (COLA) could resolve all generic technical specification COL action items before COL issuance by using one of three options. In the NRC staff's discussion of Option 3 to the ISG, the NRC staff requested that for an applicant selecting Option 3, the applicant model the Setpoint Control program (SCP) Specification, based on the SCP Specification developed in the ESBWR DC review, with suitable terminology changes to conform to the Comanche Peak, Units 3 and 4 setpoint methodology.

The NRC staff had included an example of a setpoint control program specification as part of question 16-16; however, this example was inadvertently omitted from the NRC staff's letter to Luminant. The setpoint control program specification is shown below and is provided to Luminant as an example when providing a response to RAI Number 91.

Example Setpoint Control Program Specification (Comanche Peak - Units 3 & 4 COLA)

5.0 ADMINISTRATIVE CONTROLS

5.5 Programs and Manuals

The following programs shall be established, implemented, and maintained.

5.5.XX Setpoint Control Program (SCP)

- a. The Setpoint Control Program (SCP) implements the regulatory requirement of 10 CFR 50.36(c)(1)(ii)(A) that technical specifications will include items in the category of limiting safety system settings (LSSS), which are settings for automatic protective devices related to those variables having significant safety functions.
- b. The Limiting Trip Setpoint (LTSP), Nominal Trip Setpoint (NTSP), Allowable Value (AV), As-Found Tolerance (AFT), and As-Left Tolerance (ALT) for each Technical Specification required automatic protection instrumentation function shall be calculated in conformance with the instrumentation setpoint methodology previously reviewed and approved by the NRC in [Title, Revision No., dated Month dd, yyyy, (MLxxxxxxxx)] and the conditions stated in the associated NRC safety evaluation, [Letter to MHI from NRC, Title, dated Month, dd, yyyy, (MLxxxxxxxx)].
- c. For each Technical Specification required automatic protection instrumentation function, performance of a CHANNEL CALIBRATION surveillance shall include the following:
 1. The as-found value of the instrument channel trip setting shall be compared with the previous as-left value or the specified NTSP.
 - i. If the as-found value of the instrument channel trip setting differs from the previous as-left value or the specified NTSP by more than the pre-defined test acceptance criteria band (i.e., the specified AFT), then the instrument channel shall be evaluated to verify that it is functioning in accordance with its design basis before declaring the surveillance requirement met and returning the instrument channel to service. This condition shall be dispositioned by the plant's corrective action program.
 - ii. If the as-found value of the instrument channel trip setting is less conservative than the specified AV, then the surveillance requirement is not

met and the instrument channel shall be immediately declared inoperable.

2. The instrument channel trip setting shall be set to a value within the specified ALT around the specified NTSP (a trip setting as or more conservative than the specified LTSP) at the completion of the surveillance; otherwise, the surveillance requirement is not met and the instrument channel shall be immediately declared inoperable.
- d. The difference between the instrument channel trip setting as-found value and either the previous as-left value or the specified NTSP, for each Technical Specification required automatic protection instrumentation function shall be trended and evaluated to verify that the instrument channel is functioning in accordance with its design basis.
- e. The SCP shall establish a document containing the current values of the specified LTSP, NTSP, AV, AFT, and ALT for each Technical Specification required automatic protection instrumentation function, and references to the calculation documentation. Changes to this document shall be governed by the regulatory requirements of 10 CFR 50.59. In addition, changes to the specified LTSP, NTSP, AV, AFT, and ALT values shall be governed by the approved setpoint methodology. This document including any midcycle revisions or supplements shall be provided upon issuance for each reload cycle to the NRC.

-----REVIEWER'S NOTE-----

The referenced NRC approved setpoint methodology shall meet the following guidance, and shall be applicable to Technical Specification required automatic protection instrumentation function surveillances that require verification that setpoints (or channel outputs) are within the necessary range and accuracy (e.g., CHANNEL CALIBRATIONS):

1. The methodology allows little variation in the values calculated by different analysts using identical input values (such as uncertainties and channel calibration drift).
2. The as-left value of the instrument channel trip setting shall be the value at which the channel was set at the completion of the surveillance with no additional adjustment of the instrument channel.
3. The as-found value of the instrument channel trip setting shall be the trip setting value measured during the subsequent performance of the surveillance before making any adjustment to the instrument channel that could change the trip setting value.

4. If the requirements of 5.5.XX.c.1 include an allowance for the as-found value to be compared with the specified NTSP, the following conditions shall be applied:
 - a. The setting tolerance band (i.e., the specified ALT) must be less than or equal to the square root of the sum of the squares of reference accuracy, measurement and test equipment errors, and readability uncertainties;
 - b. The setting tolerance band (i.e., the specified ALT) must be included in the total loop uncertainty; and
 - c. The pre-defined test acceptance criteria band (i.e., the specified AFT) for the as found value must include either the setting tolerance band (the specified ALT) or the uncertainties associated with the setting tolerance band (the specified ALT), but not both of these.
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