

Recommended Template for Responding to NRC
Generic Letter (GL) 2008-01, "Managing Gas Accumulation in Emergency Core Cooling,
Decay Heat Removal, and Containment Spray Systems"
(3 Month Letter)

Executive Summary

This template was prepared as guidance when preparing plant specific responses to NRC GL 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems."

In GL-2008-01, the NRC identified the following four principle areas to be addressed:

- Licensing Basis
- Design
- Testing
- Corrective Actions

The NRC requested that each licensee evaluate its ECCS, DHR system, and Containment Spray System licensing basis, design, testing, and corrective actions to ensure that gas accumulation is maintained less than the amount that challenges operability of these systems, and that appropriate action is taken when conditions adverse to quality are identified.

GL 2008-01 requires licensees to provide a written response in accordance with 10 CFR 50.54(f) that includes (a) A description of the results of evaluations that were performed pursuant to the requested actions of the GL. This description should provide sufficient information to demonstrate that you are or will be in compliance with the quality assurance criteria in Sections III, V, XI, XVI, and XVII of Appendix B to 10 CFR Part 50 and the licensing basis and operating license as those requirements apply to the subject systems of the GL; (b) A description of all corrective actions, including plant, programmatic, procedure, and licensing basis modifications that you determined were necessary to assure compliance with these regulations; and, (c) A statement regarding which corrective actions were completed, the schedule for completing the remaining corrective actions, and the basis for that schedule.

In GL 2008-01, the NRC requested the following response from each licensee:

"Within 9 months of the date of this GL, each addressee is requested to submit a written response consistent with the requested actions and information. If an addressee cannot meet the requested response date, the addressee shall provide a response within 3 months of the date of this GL and is requested to describe the alternative course of action that it proposes to take, including the basis for the acceptability of the proposed alternative course of action."

This response template addresses the 3 month response (due on or before April 11, 2008) to address actions that cannot be completed by October 11, 2008. The industry (Owners Groups, NEI, and Westinghouse) have prepared guidance for the evaluations required to be performed by GL 2008-01. The evaluation guidance includes a list of activities recommended to complete the evaluations required by the NRC. The

evaluation guidance prepared by the industry also identifies which of the individual evaluation activities are expected to be complete by October 11, 2008 (9 months from the date of the GL). The 9 month response letter must contain two items: 1) a summary of all required evaluations to respond to the GL, and 2) a summary of all corrective actions which were identified from those evaluations. A 3 month response letter is necessary if all the required evaluations and a summary of the resulting corrective actions from those evaluations will not be completed by October 11, 2008. The 3 month response should describe the proposed alternative course of action, the basis for acceptability of the proposed alternative course of action, and the proposed schedule.

NOTE

Based on the feedback obtained at the meeting between NEI, the Industry and NRC held on March 11, 2008, extensions beyond the first refueling outage after October 11, 2008 will not be received favorably.

Date: [within 3 Months of issuance of NRC Generic Letter 2008-01 on/before April 11, 2008]

ATTN: Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Comment [BSF1]: See 10 CFR 50.4 for the correct address to use.

Subject: [Plant]
Docket No(s). [50-XXX]
Three Month Response to NRC Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems"

- References:
1. NRC Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems" dated January 11, 2008.
 2. NRC Generic Letter 1988-17, "Loss of Decay Heat Removal," dated October 17, 1988.
 3. NRC Generic Letter 97-04, "Assurance of Sufficient Net Positive Suction Head for Emergency Core Cooling and Containment Heat Removal Pumps," dated October 7, 1997.
 4. NUREG-0897, "Containment Emergency Sump Performance- Technical Findings Related to USI A-43," dated October 1985.
 5. [Plant specific references.]

- Attachments:
1. NRC Generic Letter 2008-01 Requested Information for a 3 Month Response
 2. Other plant specific attachments]

The Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 2008-01 (Reference 1) to request that each licensee evaluate the licensing basis, design, testing, and corrective action programs for the Emergency Core Cooling Systems (ECCS), [Decay Heat Removal (DHR) system or Residual Heat Removal (RHR) system], and Containment Spray system, to ensure that gas accumulation is maintained less than the amount that challenges operability of these systems, and that appropriate action is taken when conditions adverse to quality are identified.

The NRC, in GL 2008-01, requested each licensee to submit a written response in accordance with 10 CFR 50.54(f) within 9 months of the date of the GL to provide the following information:

"(a) A description of the results of evaluations that were performed pursuant to the requested actions of the GL. This description should provide sufficient information to demonstrate that you are or will be in compliance with the quality assurance criteria in Sections III, V, XI, XVI, and XVII of Appendix B to 10 CFR Part 50 and the licensing basis and operating license as those requirements apply to the subject systems of the GL;

(b) A description of all corrective actions, including plant, programmatic, procedure, and licensing basis modifications that you determined were necessary to assure compliance with these regulations; and,

(c) A statement regarding which corrective actions were completed, the schedule for completing the remaining corrective actions, and the basis for that schedule."

Additionally, the NRC requested that if a licensee cannot meet the requested response date, the licensee "shall provide a response within 3 months of the date of this GL". In the 3 month response, the licensee was requested to describe the alternative course of action that it proposes to take, including the basis for the acceptability of the proposed alternative course of action.

The attachment to this letter contains the [Licensee] 3 month response to the Requested Information in NRC GL 2008-01.

[This letter contains the following new commitments:]

[This letter must be submitted under oath or affirmation.]

This response to Generic Letter (GL) 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," addresses the 3 month response requested in NRC GL 2008-01, which was dated January 11, 2008. This response discusses:

- 1) the required evaluations that will not be complete by October 11, 2008 (9 months from the date of GL 2008-01),
- 2) the alternative course of action planned, and
- 3) the basis for the acceptability of the alternative course of action.

**[EXAMPLES OF EVALUATIONS THAT MAY NOT BE COMPLETE
BY OCTOBER 11, 2008]**

- [1. [Example of a design evaluation that may not be complete by October 11, 2008]

The Requested Information in GL 2008-01 includes "A description of the results of evaluations that were performed...." The evaluations performed are those required to ensure that gas accumulations are maintained less than the amount that challenges operability of these systems. For some piping segments the existing drawings may not be sufficiently accurate to complete the required evaluations and it may not be possible to perform the walkdown(s) on these piping segments before October 11, 2008 because of the need for a refueling outage to perform the walkdown(s). Therefore, the requested evaluations for these piping segments will not be complete by October 11, 2008 due to the inability to finish the walkdown(s) for these piping segments. The walkdown(s) for these piping segments will not be completed due to the following reasons.

[For example:

- Scaffolding needs to be erected,
- Insulation needs to be removed from piping,
- High radiation areas during power operation need to be entered, or
- Prolonged containment entries during power operation need to be made.]

[Discuss the proposed schedule and basis (e.g., need of refueling outage, limited removal of insulation due to EQ requirements (heat load) and ALARA concerns) for delaying the completion of system walkdown(s)].

[Discuss the basis for the acceptability of the alternative course of action (i.e., delayed system walkdowns). Items to be discussed here can include the adequacy of the current design basis (previous drawing reviews and/or design basis verifications), plant specific operational experience (no past problems with gas voids), the successful performance of surveillance requirements, the results of any previous system inspections, previous issues related to gas voids that were successfully resolved, compensatory actions that may be implemented (i.e., increased use of UT for void detection, additional training, revised venting procedures, additional pump monitoring to trend pump vibration, discharge pressure, amps, etc.).]

[2. [Example of a testing evaluation that may not be complete by October 11, 2008.]

The Requested Information in GL 2008-01 includes "A description of all corrective actions, including plant, programmatic, procedure, and licensing basis modifications that you determined were necessary to assure compliance with these regulations;..." The requested description of all corrective actions pertaining to procedure modifications would require that a review of all applicable procedures be complete by October 11, 2008. Therefore, the requested description of all corrective actions that result from the procedure reviews will not be entirely complete by October 11, 2008 due to the large number of plant procedures to be reviewed. The scope of procedures that may be affected by the evaluation(s) requested in GL 2008-01 includes:

- Maintenance,
- Testing (e.g., all pump tests including restoration to standby conditions), and
- Plant evolutions (e.g., suction source change such as tank to suppression pool or RWST to containment sump or evolutions involving idle train startup)]

[Discuss the proposed schedule and basis (e.g., approximately [xxxx] procedures need to be reviewed, the need to train reviewers prior to beginning the reviews, and the need to augment plant staff) for delaying the completion of procedure reviews.]

[Discuss the basis for the acceptability of the alternative course of action (i.e., delayed procedure reviews). Items to be discussed here can include such things as compensatory measures taken, including additional pre-job briefing/training, and additional UT measures taken to identify gas voids.]

[3. **INSERT DESCRIPTIONS OF OTHER PLANT SPECIFIC EVALUATION(S)
THAT MAY NOT BE COMPLETE BY OCTOBER 11, 2008**