

From: Thompson, Jon
Sent: Thursday, October 21, 2010 3:42 PM
To: Ashe, Ken; Hentz, Lee A
Subject: RAI REGARDING LICENSE AMENDMENT TO RELOCATE SPECIFIC SURVEILLANCE FREQUENCY REQUIREMENTS TO A LICENSEE-CONTROLLED PROGRAM USING A RISK-INFORMED JUSTIFICATION

Mr. Hentz,

The following RAI from the Nuclear Regulatory Commission (NRC) staff pertains to the LAR to relocate specific surveillance frequency requirements to a licensee-controlled program using a risk-informed justification for McGuire 1 and 2 as described in the letter dated March 31, 2010 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML100920160), submitted by Duke Energy Carolinas, LLC (the licensee):

1. Table 2-1 of Attachment 2 identifies specific unresolved “gaps” of the McGuire Nuclear Station probabilistic risk assessment (PRA) internal events model to meeting the American Society of Mechanical Engineers PRA standard Capability Category II supporting requirements. In the column labeled “Importance to 5b Application,” the licensee asserts, for some specific supporting requirements which are not met at Capability Category II, that:
 - i) Certain gaps will be assessed on a case-by-case basis
 - ii) The gap has no or minimal impact on surveillance test exceptions.

Asserting that certain gaps are to be assessed on a case-by-case basis is inconsistent with Nuclear Energy Institute (NEI) 04-10, Revision 1, which specifically requires Capability Category II. Further, NEI 04-10 requires all gaps to Capability Category II to be assessed via sensitivity studies. This position was accepted by the NRC staff in its safety evaluation of NEI 04-10 Revision 1. Therefore, notwithstanding the assertions in Table 2-1 regarding Capability Category I, each supporting requirement not meeting Capability Category II must be further evaluated by sensitivity studies when applying the internal events PRA model for this application.

With regard to item ii above, the gaps cannot be dispositioned a priori, since this would also conflict with NEI 04-10 which did not identify any supporting requirements that were not required for this application. Again, such gaps must be evaluated by sensitivity studies for each surveillance frequency change.

The licensee is therefore requested to confirm that their plant program for control of surveillance frequencies includes a requirement to assess all open gaps to Capability Category II of the standard via sensitivity studies for each application of the NEI 04-10 methodology, and does not rely upon any a priori assessment of the relevance of the supporting requirement.

2. In Table 2-1, Attachment 2 of the submittal, gap #14 identifies twelve supporting requirement deficiencies to the model. The licensee dispositions this gap as documentation issues. The NRC staff requires a detailed clarification for all supporting requirements that were assessed against Capability Category II technical requirements and characterized as model documentation issues.

Please contact me, if you are not able to respond to these RAIs within 30 days.

Sincerely,

Jon Thompson, Project Manager
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

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Sent Date: 10/21/2010 3:35:21 PM

Received Date: 10/21/2010 3:41:00 PM

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Files	Size	Date & Time
MESSAGE	11948	10/21/2010

Options

Expiration Date:

Priority: olImportanceNormal

ReplyRequested: False

Return Notification: False

Sensitivity: olNormal

Recipients received: