

Official Transcript of Proceedings  
NUCLEAR REGULATORY COMMISSION

Title: Advisory Committee on Reactor Safeguards  
Westinghouse AP1000 DCD: Open Session

Docket Number: (n/a)

Location: Rockville, Maryland

Date: Wednesday, November 3, 2010

Work Order No.: NRC-529

Pages 1-48

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ADVISORY COMMITTEE ON REACTOR SAFEGUARDS

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UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

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ADVISORY COMMITTEE ON REACTOR SAFEGUARDS

(ACRS)

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SUBCOMMITTEE ON THE WESTINGHOUSE AP1000 DCD

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OPEN SESSION

+ + + + +

WEDNESDAY

NOVEMBER 3, 2010

+ + + + +

ROCKVILLE, MARYLAND

+ + + + +

The Subcommittee met at the Nuclear  
Regulatory Commission, Two White Flint North, Room  
T2B1, 11545 Rockville Pike, at 8:30 a.m., Harold B.  
Ray, Chairman, presiding.

SUBCOMMITTEE MEMBERS:

HAROLD B. RAY, Chairman

SAID ABDEL-KHALIK, Member

J. SAM ARMIJO, Member

DENNIS C. BLEY, Member

MARIO V. BONACA, Member

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1 SUBCOMMITTEE MEMBERS: (cont.)

2 CHARLES H. BROWN, Member

3 JOY REMPE, Member

4 MICHAEL T. RYAN, Member

5 WILLIAM J. SHACK, Member

6 JOHN D. SIEBER, Member

7 JOHN W. STETKAR, Member

8

9 CONSULTANTS:

10 THOMAS S. KRESS

11 GRAHAM B. WALLIS

12

13 DESIGNATED FEDERAL OFFICIAL:

14 WEIDONG WANG

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P-R-O-C-E-E-D-I-N-G-S

8:29 a.m.

CHAIRMAN RAY: The meeting will now come to order. This is the second day of the meeting of the AP1000 Reactor Subcommittee as standing subcommittee of the Advisory Committee on Reactor Safeguards.

I'm Harold Ray, Chairman of the subcommittee. ACRS members in attendance are Jack Sieber, Dennis Bley, Sam Armijo, Said Abdel-Khalik, Mike Ryan, Bill Shack, Joy Rempe, Mario Bonaca, John Stetkar and Charles Brown, and their attendance is very much appreciated.

We're going to - let me do a couple other things here that are pro forma as well. As I stated yesterday, we will be hearing presentations from the DCD applicant for Revision 17 of AP1000 DCD.

At mid-morning here, another hour or so, the meeting will be closed in order to hear proprietary information that will be presented by Westinghouse pursuant to 5 USC. And attendance at the closed portion of the meeting dealing with such information will be limited to Westinghouse representatives, the NRC staff and its consultants and those individuals and organizations who have entered into an appropriate Confidentiality Agreement with

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1 them.

2 Consequently at that time, we will need to  
3 confirm we have only eligible observers and  
4 participants in the room for the closed portions of  
5 the meeting. This meeting is scheduled to run until  
6 noon today.

7 We're going to be continuing to gather  
8 information and analyze relevant issues and facts and  
9 formulate proposed positions and actions that are  
10 appropriate for deliberation by the full committee.

11 The rules for participation in today's  
12 meeting have been announced as part of the notice of  
13 this meeting previously published in the Federal  
14 Register.

15 Weidong, we have an open line at this  
16 time, do we?

17 MR. WANG: Let me just check and make sure.

18 CHAIRMAN RAY: Okay. There is a transcript  
19 being kept and it will be made available, as stated in  
20 the Federal Register Notice. Therefore, we request  
21 that participants in this meeting use the microphones  
22 located throughout the meeting room.

23 When addressing the subcommittee, the  
24 participants should first identify themselves and  
25 speak with sufficient clarity and volume so that they

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1 may be readily heard.

2 Now, yesterday we had, among other things,  
3 discussion of the topic of aircraft impact. Let me  
4 just say that upon deliberating and recognizing the  
5 staff's review isn't yet complete so that we can hear  
6 their final input on that subject and given the  
7 otherwise character of the subject, we have concluded  
8 that we'll be looking to write a separate letter on  
9 aircraft impact from the comprehensive letter that we  
10 are targeting to be able to write in December.

11 And, therefore, we will produce the ACRS  
12 letter on AP1000 aircraft impact when we're able and  
13 ready to do so.

14 We'll continue on with the other items  
15 that are on our agenda aiming toward the December full  
16 committee meeting, as I indicated.

17 We're going to begin that process or  
18 resume that process, I should say, with another action  
19 item that will be discussed this morning because of  
20 staff availability. That item is as noted on the  
21 screen.

22 We'll not begin the I&C portion of the  
23 meeting until - it's scheduled for 9:45, I think.

24 MR. WANG: 9:45, yes.

25 CHAIRMAN RAY: Yes. That's going to limit

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1 the time available. So, I want to make sure that we  
2 start timely then regardless, because it's very  
3 important that we have the opportunity. And, as I  
4 say, time is limited to explore the issues involved  
5 there.

6 As time permits after the discussion of  
7 this item and any other specific items that we have,  
8 we will also want to review briefly the entire list of  
9 action items remaining just to make sure that we are  
10 on track toward closure of those items.

11 There will be a three-day AP1000  
12 subcommittee meeting later this month at which the  
13 bulk of the heavy lifting that remains needs to be  
14 completed, and it behooves us not to have any  
15 miscommunications about where we stand.

16 One other item that I want to note here is  
17 that yesterday there was some further review  
18 opportunity of the classified material that  
19 Westinghouse provided. And that has led to some  
20 further discussion between at least one of the members  
21 here, perhaps others as well, and Westinghouse.

22 Ed, you know what I'm talking about, do  
23 you?

24 MR. CUMMINS: Yes, I do.

25 CHAIRMAN RAY: All right. Do you

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1 anticipate that will occur yet this week or at some  
2 later time?

3 MR. CUMMINS: I think at a later time.

4 CHAIRMAN RAY: I see. All right.

5 Well, that and the fact that the staff  
6 hasn't finished their review, both of them lead to the  
7 conclusion that I stated, which is that we will have  
8 an AIA letter when it's ready to write, but it won't  
9 hold up proceeding on toward a December letter on the  
10 DCD application - amendment, I mean, generally.

11 Okay. All of that having been said, I'll  
12 ask my colleagues if they have any comment they'd like  
13 to make to start with, please.

14 MEMBER ABDEL-KHALIK: Mr. Chairman, just  
15 for the record, Joy's last name is Rempe rather than  
16 Rempke.

17 CHAIRMAN RAY: Ah, that's my mistake.

18 MEMBER ABDEL-KHALIK: With a difficult last  
19 name, I'm always sensitive to the pronunciation of  
20 people's names.

21 CHAIRMAN RAY: Yes, that was a - that was  
22 my fault.

23 Something about Rempke that just -

24 MEMBER ARMIJO: We all knew Rempkes.

25 MEMBER STETKAR: You'll just have to change

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1 it, Joy.

2 MEMBER REMPE: It's my husband's name.

3 (Laughter.)

4 CHAIRMAN RAY: All right. Any other  
5 important information?

6 With that, then, we'll turn to  
7 Westinghouse.

8 MR. SEELMAN: Thank you, Mr. Chairman. My  
9 name is Bob Seelman from NPP Licensing, Westinghouse.  
10 To my right is John Ewald, NPP Engineering.

11 John is the subject matter expert for this  
12 item, reactor circuit breaker testing. This is ACRS  
13 Action Item Number 41.

14 In this slide, I restate the action item.  
15 Again, it deals with testing frequency and it  
16 involves - we'd like to know more information on the  
17 operating experience on the circuit breakers. And in  
18 addition to that, discussions on yearly testing -  
19 focus on yearly testing.

20 Now, I'll turn this over to John. This  
21 slide here talks about the history from the last ten  
22 years, basically. 2000 to present.

23 MR. EWALD: Okay. As Bob stated, we did a  
24 database search on the INPO database and pulled the -  
25 every breaker failure or fault that occurred in the

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1 last ten years on Westinghouse plants. And we came up  
2 with 17 cases of issues that occurred with reactor  
3 trip circuit breakers.

4 And I started out with we had three cases  
5 of reactor trip circuit breaker failure to trip, and  
6 I've categorized these as to what the end result was.

7 One was an undervoltage trip failed during testing  
8 due to an undervoltage coil issue, but the shunt trip  
9 still worked.

10 So, the breaker still would have tripped  
11 on the dual undervoltage shunt trip arrangements that  
12 we use.

13 We had one trip fail during a shutdown  
14 testing due to mechanical failure of the breaker. I  
15 identified that as the one case where the breaker  
16 actually failed to trip regardless of what we would  
17 have done.

18 And we had one other failure to trip due  
19 to a UV driver which is basically the - on the auto  
20 side of those - that particular system that we're  
21 using in that plant, which would have prevented an  
22 auto trip, but not a manual trip.

23 In other words, I wouldn't really have  
24 considered that a breaker failure. More of a driver  
25 failure that prevented the breaker from tripping.

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1           Then the other cases that we had which are  
2 the majority of the cases you happen to see with most  
3 reactor trip circuit breakers, we had five cases where  
4 the reactor trip circuit breaker failed to close or  
5 reset. And there was various reasons for that, but  
6 all of those - and all of these actually occurred  
7 during some type of reactor trip circuit breaker  
8 testing that we were doing either during a routine  
9 tripping of the breakers or during an extended  
10 shutdown, do an extensive maintenance inspection on  
11 the breakers.

12           MEMBER BLEY: When you say "reset," is that  
13 the relays failed to reset in time?

14           MR. EWALD: There was multiple - when I say  
15 "close" or "reset," I mean either some of these have -  
16 they have a charging motor that will charge the  
17 springs, and then you can reset.

18           Sometimes that didn't reset. Sometimes  
19 the springs failed or - the end result was either the  
20 breaker couldn't be reset or recharged in order to re-  
21 shut it. Or when it did re-shut, it either had a  
22 mechanical failure, a latch failure of some sort or  
23 the charging motor didn't charge, so he couldn't shut  
24 it.

25           And I had five cases of inadvertent trip

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1 of reactor circuit breakers during maintenance. And  
2 most of those were procedural issues where someone  
3 skipped a step in the procedure and tripped a breaker  
4 before they expected it to trip during testing.

5 Also had four cases which I couldn't  
6 really fit into any other categories, defects  
7 identified during shutdown maintenance. And those  
8 were either clearances in the mechanical linkage,  
9 inspections that showed degradation in the physical  
10 quality of the breaker.

11 None of them that would have affected  
12 tripping, but - and in most of those cases if you dig  
13 deep into the details, most of them would probably  
14 been an issue with resetting and shutting the breaker.

15 So, that's my entire history. So, based  
16 on that - that's the last ten years in particular  
17 Westinghouse plants. And I have a - my summary of  
18 that would be in the last ten years we had one case of  
19 where a breaker would have failed to trip.

20 MEMBER STETKAR: John?

21 MR. EWALD: Yes.

22 MEMBER STETKAR: This is interesting  
23 information for the numerator of the failure rate.

24 Do you have any sense of what the  
25 denominator is, the actual number of circuit breaker

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1 valid demands to open?

2 Are we talking about a hundred, 10,000, a  
3 million?

4 MR. EWALD: That's a good question.

5 (Off the record comments.)

6 MR. EWALD: Yes, if you figure - does  
7 anybody know exactly how many Westinghouse plants we  
8 have?

9 (Laughter.)

10 MR. CUMMINS: 60

11 MR. EWALD: Do we have 60?

12 MEMBER BROWN: How many breakers per plant?

13 MR. EWALD: Four.

14 MEMBER BROWN: That's the existing.

15 MR. EWALD: Existing plants, right. The  
16 AP1000 obviously has eight.

17 MEMBER BROWN: Right.

18 MR. EWALD: And understand that the four  
19 breakers in an existing plant, two of those are bypass  
20 breakers for testing the normal breaker that's in  
21 service. Because if you open it, you trip the plant.

22 So, you have a bypass breaker that you put  
23 in place while you're testing that breaker, and you  
24 test the bypass breaker.

25 MEMBER STETKAR: Do people have to report

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1 failures of the bypass breaker?

2 MR. EWALD: Yes, the - some of these are  
3 bypass breaker issues. Okay. A couple of these if  
4 you read the reports, was actually bypass breaker  
5 testing.

6 Actually, one of these I recall, they were  
7 racking a bypass breaker in and the racking bar  
8 crossed the, you know, caused a short in the supply to  
9 the CRDMs and dropped a bunch of rods.

10 So, what you get from this history kind of  
11 goes back to why we came up with the particular design  
12 of the eight breakers we have in AP1000.

13 MEMBER ABDEL-KHALIK: But to answer John's  
14 question, it would seem that the failure rate would be  
15 a few times ten to the minus four.

16 MEMBER STETKAR: I'm trying to get that  
17 from that.

18 MR. CUMMINS: This is Ed Cummins. We don't  
19 have the pure answer, but we could discuss what the  
20 basis of the answer is that the surveillance is  
21 basically every 90 days, we think, for most of them.

22 So, 60 plants or 50 plants times four per  
23 year for surveillance, plus one for shutdown, let's  
24 say, every year and maybe one more, and then times 60  
25 and that's the basis of your number of demands in

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1 total, I think.

2 MR. EWALD: And the ten years.

3 MR. CUMMINS: Times ten years. Ten years  
4 times 60 plants or -

5 MR. EWALD: So, ten to the minus fourth is  
6 pretty close.

7 MEMBER STETKAR: Okay. Thanks. That's all  
8 I was looking for, you know.

9 MR. EWALD: Okay.

10 MEMBER STETKAR: Precision is not  
11 necessary, Ed.

12 MR. EWALD: Precision is not necessary.

13 MEMBER STETKAR: Reasonable accuracy is  
14 accepted.

15 MEMBER BROWN: The manual trip, the third  
16 bullet you have there -

17 MR. EWALD: Correct.

18 MEMBER BROWN: - was that an electrical  
19 manual trip or was that a walk to the breaker and -

20 MR. EWALD: That was an electrical manual  
21 trip.

22 MEMBER BROWN: Okay.

23 MR. EWALD: Because -

24 MEMBER BROWN: So, it actually exercised  
25 the same coil to -

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1 MR. EWALD: It actually exercised -

2 MEMBER BROWN: - the manual trip circuit -

3 MR. EWALD: Which is why I eliminated it,  
4 yes. They actually had the UV -

5 MEMBER BROWN: What kind of breakers?

6 Are these the molded case-type breakers,  
7 air circuit breakers?

8 MR. EWALD: These were all multi-case, I  
9 believe.

10 MEMBER BROWN: Molded?

11 MR. EWALD: Molded case, yes.

12 MEMBER BROWN: Okay. Standard small size  
13 distribution panel-type breakers, not the big 2,000 -  
14 these are 250s, 400s.

15 MR. EWALD: They're 250s, 400s.

16 MR. BROWN: Okay.

17 MEMBER STETKAR: They're not what you'd  
18 normally think of as multi-case breakers.

19 MR. EWALD: No, not what you'd normally  
20 think on -

21 MEMBER BROWN: No, I understand that.

22 MEMBER STETKAR: They're better  
23 characterized as an air circuit breaker, but not the  
24 way you think of those.

25 MEMBER BROWN: All breakers are air -

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1 they're all air circuit breakers.

2 (Simultaneous speaking.)

3 MEMBER BROWN: They come in a molded case  
4 or they're just in a metal frame.

5 MR. EWALD: They're just in a metal frame.

6 MEMBER BROWN: Okay, but they're small  
7 rated.

8 MR. EWALD: They're smaller breakers.

9 I guess compared to the rest of the  
10 breakers in a conventional plant, they're small.

11 MEMBER STETKAR: They're typically about  
12 380 volts contact. It's a different voltage that they  
13 run the CRD power supplies with. They're like a 480  
14 volt.

15 MEMBER BROWN: Yes, well, I mean, I'm just  
16 looking for the same rates. The ones I was familiar  
17 with are 600-volt rate, 250, 400 amp-type breakers.  
18 They've got a very tight case because they're meant to  
19 be compact. And these don't have to be compact,  
20 that's all.

21 MEMBER SIEBER: It's like a wall switch.

22 MR. SEELMAN: The same subject was  
23 addressed - is addressed in the SER under open items  
24 SRP 7.2 ICE-03. And the staff considered this item  
25 resolved. And if you all read through it -

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1 MEMBER BROWN: Let me - if you don't mind  
2 me interrupting for a second, please, John asked a  
3 question. We were trying to get to a number.

4 Characterizing the failures that you had  
5 if you were only testing these once a year, what would  
6 that - and you had the same failures -

7 MEMBER STETKAR: It depends on the failure  
8 rate model that you use, but it would be approximately  
9 four times higher.

10 So, you'd be looking at sort of middle  
11 times ten to the minus four-ish depending on whose  
12 theories you work about latent incipient-type failures  
13 versus shock-type demand failures and all that kind of  
14 stuff.

15 It would essentially multiply it by about  
16 four.

17 MEMBER BROWN: Okay. All right. So,  
18 that's the way you would be thinking on that in your  
19 world.

20 MEMBER STETKAR: Yes, it's the way one  
21 could think about it.

22 MEMBER BROWN: Okay. Thank you.

23 MR. SEELMAN: I'll just read the words from  
24 the SER.

25 Westinghouse stated that each individual

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1 RTCB would be opened during a trip actuation device  
2 operational test once per year. In current licensed  
3 plants, the maximum length of time between openings of  
4 RTCBs, or equivalent, is typically 92 days. This  
5 issue is discussed in Chapter 16 of NUREG-1793 and  
6 this supplement. This issue was determined to be  
7 adequately addressed in Revision 15 of the DCD and no  
8 changes were made to the RTCB layout or design,  
9 including the periodicity of RTCB testing. Therefore,  
10 this open item is considered resolved.

11 MEMBER BROWN: The point of this one is  
12 that this was a pre-recertification or pre-amendment,  
13 whatever we want to call it, design and it has not  
14 been changed.

15 MR. EWALD: That's correct. In plain  
16 English, yes.

17 MEMBER BROWN: That's what I was trying to  
18 get down to, plain English.

19 MR. EWALD: That's plain English.

20 MEMBER ABDEL-KHALIK: Given the failure  
21 rates that we're talking about here, do you still  
22 consider this periodicity of annual versus quarterly  
23 to be still appropriate?

24 MR. EWALD: Yes.

25 MEMBER ABDEL-KHALIK: And on what basis is

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1 that "yes" reached?

2 MR. EWALD: That basis is because the  
3 AP1000 design is different than what the conventional  
4 plants are using.

5 In AP1000 we have - if you'll recall, we  
6 have eight breakers versus four. Eight that are in  
7 service. And you need two of the four divisions to  
8 open at least one of its breakers in order to trip the  
9 plant.

10 So, you need two out of eight breakers to  
11 work in order to trip the plant. So - and there's a  
12 little bit more that piles on in that and we can sit  
13 here and figure out all the different angles, but it's  
14 kind of a combination of more breakers and four  
15 divisions versus two that will cause a plant trip.

16 So, you have additional redundancy not  
17 only in your electronics, which one of those failures  
18 was due to the undervoltage trip unit control, but you  
19 also have more breakers available to trip the plant.

20 CHAIRMAN RAY: Well, that seems to me like  
21 a better rationale than the statistics we've been  
22 discussing. Although that's -

23 MR. EWALD: But the question came up.

24 CHAIRMAN RAY: Yes, I understand.

25 What I was going to say is it seems to me

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1 like this kind of testing is - can't presume  
2 uniformity of behavior.

3 In other words, what I'm considering is a  
4 defect in a particular model of a breaker that makes  
5 it an outlier in terms of the total set of breakers  
6 out there, and how do you detect the fact that it has  
7 this defect.

8 That's the way I would have approached  
9 thinking about why do we do this quarterly when the  
10 data don't seem to support it?

11 Answer: Because I may have a breaker in my  
12 plant that doesn't fit the data that we're talking  
13 about.

14 It seems to me like a response to that in  
15 this case would be well, but we have a much more  
16 robust arrangement of breakers, so I don't rely on as  
17 much reliability as others do.

18 In other words, I wouldn't want to take  
19 your data and apply it to the other plants that aren't  
20 of this design and say oh, well, just do it once a  
21 year or maybe every five years or whenever you feel  
22 like it, because it just doesn't seem to me like you  
23 can make the leap that I might not have something  
24 that's uniquely problematic with regard to the  
25 breakers that I have in my plant.

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1           But anyway, I just want to make that  
2 observation.

3           MEMBER BLEY: I'd make a slightly different  
4 observation in addition to that.

5           The one thing we have to be alert to when  
6 we do this, is that the - here are ten years, but  
7 actually more like 30, 40 years of experience with  
8 these breakers as being exercised quarterly, and now  
9 they won't be exercised quarterly.

10           They'll be exercised annually, and that  
11 means other failure modes might show up that aren't  
12 showing up because we're exercising them. So, we need  
13 to watch this pretty carefully as we go ahead.

14           And so you can't just extrapolate on the  
15 test frequency.

16           MEMBER BROWN: One of the issues we had  
17 with the breakers, we had if you didn't exercise them  
18 you had a tendency for them to not - you got a  
19 different failure history.

20           MEMBER BLEY: He had one manual failure - I  
21 mean one mechanical failure.

22           MEMBER BROWN: All I'm doing is emphasizing  
23 we actually saw that we failed to the - I don't want  
24 to say "fit." Poor word. We opted to test and  
25 continue testing at the quarterly rate just because of

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1 that particular thought process and condition.

2 One other thought - just let me throw one  
3 other thing. We're touting the new I&C systems that  
4 we have in here with all the self-diagnostic  
5 capabilities. So, we're testing the whole rest.

6 All the rest of the protection train is  
7 being continually tested all the time 360 days a year  
8 - 365 days a year. I'll get that right. 24 hours a  
9 day.

10 Yet for these, the last - the last door  
11 that has to be opened, we say oh, it's okay. We're  
12 just going to test those once a year.

13 It just seems to be counterintuitive when  
14 you - when you look at how do you want to make sure  
15 these things are working satisfactorily.

16 MEMBER STETKAR: Eventually we'll get you  
17 to think like a PRA guy once you realize that what you  
18 just -

19 MEMBER BROWN: Did I just now sound like  
20 one?

21 (Off the record comments.)

22 CHAIRMAN RAY: Okay, everybody. We've got  
23 a half-day meeting here. Let me ask them to move on.

24 MEMBER BLEY: Well, before we leave that, I  
25 want to make one comment about there is the opposite

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1 side of it that we all should stay aware of. And that  
2 is you identified five cases of inadvertent trips  
3 during maintenance.

4 I don't know how many of those tripped the  
5 plant, if any, but -

6 MR. CUMMINS: About three of them tripped  
7 the plant.

8 MR. BLEY: So, that's putting challenges on  
9 the plant. So, the more you test, the more those kind  
10 of challenges you'd see.

11 CHAIRMAN RAY: I'm sure that's in people's  
12 mind when they try and pick the right interval is to  
13 avoid inadvertent trips, as well as the maintenance  
14 time that's required to set up and conduct the task.

15 Okay. Please go ahead.

16 MR. EWALD: And I have a conclusion which I  
17 believe I've already stated, but there is - I have  
18 only one breaker failure in the Westinghouse operating  
19 fleet in the last ten years that would have prevented  
20 the opening of a reactor trip breaker.

21 In AP1000, we only need two out of the  
22 eight to function in order to ensure reactor trip, as  
23 I stated before.

24 And I believe based on the historical low  
25 failure rate of reactor trip circuit breakers

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1 combined, which was, I think, is the relevant point,  
2 which the increased redundancy in the AP1000 reactor  
3 trip circuit breaker configuration, it's a reasonable  
4 engineering judgment to conclude that the 92-day  
5 staggered testing frequency is acceptable.

6 CHAIRMAN RAY: Okay. Any further  
7 comments/questions?

8 I'm prepared to see us close this open  
9 item unless there's anyone who feels there's something  
10 more that needs to be done.

11 Hearing nothing, so be it.

12 Now, in addition to my failure to  
13 pronounce Member Rempe's name correctly, I failed to  
14 also note that we have consultants Graham Wallis and  
15 Tom Kress with us here at the table, which I should  
16 have done, but I was improvising from yesterday's  
17 script. Thank you, gentlemen.

18 Okay. Weidong and Eileen, what is next,  
19 if anything?

20 MS. MCKENNA: I'm going to ask was there  
21 any other action items that you had a specific  
22 presentation on?

23 MR. NELSON: I mean, that's it for action  
24 items other than looking at status and planning.

25 MS. MCKENNA: This might be then since

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1 we're going to wait a little later for the I&C, that  
2 this might be the right time to do the more  
3 comprehensive review of the action items that you had  
4 suggested.

5 CHAIRMAN RAY: We will do that then. All  
6 right.

7 Now, Weidong has been in communication  
8 with all of us seeking to make sure we've got the  
9 right timing and schedule for closing action items.

10 We'll probably have to continue to do  
11 that. There's a lot of coordination involved in doing  
12 it.

13 We're just today speaking to one of our  
14 consultants who has a conflict that's rather critical  
15 for us and we may wind up having that person on the  
16 line from overseas at the time when we try and address  
17 the issues that he's concerned with.

18 So, in any event, this will be the last  
19 time I believe I'll ask your indulgence to take a look  
20 with us at the action item list. Weidong passed out a  
21 copy yesterday. Anyone who doesn't have one, please  
22 indicate to him now that you need a copy and will take  
23 a look at it. And with Westinghouse participation as  
24 well.

25 So, we managed to close Item 2 yesterday.

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1 I don't want to revisit anything that we've closed.  
2 I've made that rule.

3 Item 4, however, reactor coolant pump  
4 flywheel, we have a schedule to address that, do we,  
5 and Westinghouse is prepared?

6 MS. MCKENNA: We are, but I think the staff  
7 is doing it in light of some of the calculations that  
8 were done for the lock rotor and we're not finished.  
9 But they will report back at one of the later days in  
10 November after they finish that review.

11 CHAIRMAN RAY: All right. Still open.

12 Six, we've had a lot of discussion about.  
13 We wound up with some remaining questions that are  
14 indicated here for Item 6. Sanjoy is not here quite  
15 yet. He'll be here later today.

16 Any comment anyone has on that, including  
17 of course you, Eileen, or Westinghouse?

18 MS. MCKENNA: I have no comment.

19 CHAIRMAN RAY: All right. Fine. Thank  
20 you.

21 Item 10, this - I think the only item that  
22 remained here was as indicated in the right-hand  
23 column.

24 What's the status, Graham, of this as you  
25 understand it?

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1 DR. WALLIS: I don't know of any status.  
2 Nothing has changed.

3 CHAIRMAN RAY: Well, okay. At the  
4 September meeting, it indicates that there was an  
5 exchange between you and Sanjoy.

6 DR. WALLIS: It says Westinghouse provide a  
7 reference. Is that - Sanjoy was looking for the  
8 reference.

9 CHAIRMAN RAY: No, on the right-hand column  
10 where it says September 21st subcommittee meeting  
11 Sanjoy asked to pass the consultant reports by Dr.  
12 Wallis to staff to address the -

13 MEMBER SHACK: Graham came up with the  
14 rationale.

15 DR. WALLIS: I came up with the rationale.  
16 That's all with that. I don't know what happened to  
17 it.

18 DR. KRESS: I've got a copy. I think I  
19 sent it to everybody.

20 CHAIRMAN RAY: All right. Weidong is -

21 MR. WANG: All I know is that consultancy  
22 reports I passed to the members and also the staff.

23 CHAIRMAN RAY: Okay. So, we need to have a  
24 slot at which we close that out scheduled. All right.  
25 I'm not going to try and do it here.

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1 MR. WANG: Closed.

2 MEMBER SHACK: Graham did it by Bayesian  
3 update. You can do it by maximum likelihood, but you  
4 come up with their formula, basically.

5 CHAIRMAN RAY: Okay. All right. Well,  
6 let's just do it when Sanjoy is here.

7 Item 11 I have addressed. It's neither  
8 open or closed at this point. It is simply a work  
9 item that we will address by letter when - the open  
10 item would consist basically of us hearing from staff  
11 about the conclusion of their - final conclusion of  
12 their review with closure of the item that Sam  
13 identified and reviewed last evening.

14 And so as I say it's open in that sense,  
15 but there isn't any other work pending that I'm aware  
16 of.

17 MEMBER ABDEL-KHALIK: In addition to the  
18 items that we talked about yesterday.

19 CHAIRMAN RAY: Yes, that's right. We did  
20 that in closed session at the end of the day. That's  
21 right, yes. Okay. So, in that sense I guess I should  
22 just say it remains open.

23 Item 37, Sam.

24 MEMBER ARMIJO: I think we're going to be  
25 addressing long-term cooling this week, right? In the

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1 full committee meeting.

2 CHAIRMAN RAY: Okay.

3 MEMBER ARMIJO: And I did get the reports  
4 and they address the issue. So, it just needs to be -  
5 to hear the staff from Westinghouse discuss those and  
6 talk -

7 CHAIRMAN RAY: Okay. So, we anticipate  
8 it's on course for conclusion.

9 MEMBER ARMIJO: Yes.

10 CHAIRMAN RAY: Thank you. We've just heard  
11 41 and closed it.

12 46.

13 MR. NELSON: This is Mike Nelson. We're  
14 scheduling 46 for the 17th, 18th and 19th. However,  
15 we were looking for any additional information on the  
16 PRA questions if anybody recalls as we prepare for the  
17 meeting.

18 CHAIRMAN RAY: Okay.

19 MR. NELSON: We checked the transcripts and  
20 still had trouble determining what the - we were  
21 looking to answer on the risk ranking for the MOVs and  
22 the POV testing.

23 If anything comes to mind, we'd appreciate  
24 it.

25 CHAIRMAN RAY: Well, let's ask John and

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1 Bill to provide any comments that they would like to  
2 at this point.

3 MEMBER SHACK: That's John's issue, I  
4 think.

5 MEMBER STETKAR: I'm trying to remember.  
6 If I recall, you know, you may have to prompt my  
7 memory, but I was looking for the basis, you know, how  
8 you used the PRA results to provide that risk ranking  
9 of the MOVs for the testing program, you know.

10 What I'm looking for, you know, did you  
11 use risk importance measures, specific numerical  
12 measures that came out of the PRA?

13 Was it more of a qualitative assessment  
14 or, you know, how was the PRA used, if it was, to  
15 determine that risk ranking of valves for the testing  
16 program?

17 CHAIRMAN RAY: All right. 48 is even more  
18 obscure to me. So, these ADS interlocks, I'm not even  
19 sure - Weidong, could you help clarify whose issue  
20 this was or is one of the members -

21 MS. MCKENNA: I went back and reviewed the  
22 transcript. I think this also was John Stetkar's  
23 issue. And I think Graham also might have had some -  
24 it was a question about whether if ADS 1, 2, 3 -  
25 there's kind of a time delay normally between how

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1 they're sequenced. And if ADS 1 was actuated, whether  
2 then ADS 2 and ADS 3 would also go off.

3 And I think that was - and was that  
4 covered by the analysis, because the analysis in  
5 Chapter 15, I believe, really looks at the ADS 1  
6 opening.

7 And that's the way from looking back at  
8 the transcript is how I understood the issue, but  
9 certainly we'd be welcome to have a clarification  
10 today.

11 MR. NELSON: We have a presentation for  
12 that when we were going to cover Chapter 15 last  
13 meeting - this is Mike Nelson again.

14 And when we do 15 on the - as we scheduled  
15 for these next three days, we'll have a presentation  
16 there to address that action.

17 MEMBER STETKAR: And I think, I'm trying to  
18 also remember, fogginess, but I believe it was - it  
19 was questions about exactly how the timing in the  
20 interlocks are set up both from the perspective of can  
21 you actuate later stages of ADS given failure, for  
22 example, an earlier stage, or could you spuriously  
23 actuate, for example, ADS 4 despite the fact that ADS  
24 1, 2 and 3, you know, were disabled for some reason.

25 That's also in the general sense of that

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1 interlock-type issue. It's more of trying to  
2 understand exactly how the system works.

3 CHAIRMAN RAY: And you guys plan to make a  
4 presentation that will allow that?

5 MR. NELSON: That's correct.

6 CHAIRMAN RAY: All right. Fine. Thank  
7 you.

8 All right. Now, Dr. Banerjee isn't, as I  
9 said, here yet. Item 49 concern is attributed to him  
10 and has a number of items identified.

11 Any comment, Eileen or Westinghouse, on  
12 49? I assume it's scheduled -

13 MR. NELSON: It would be part of Chapter  
14 15.

15 CHAIRMAN RAY: - as attendance in mind.

16 50 similarly. All right. 51, we've been  
17 talking about this just offline here recently.

18 Anybody need any clarification there? It  
19 seems straightforward enough.

20 MEMBER ARMIJO: Yes.

21 CHAIRMAN RAY: Go ahead.

22 MEMBER ARMIJO: Qualitatively I know what's  
23 going to happen, but I wouldn't mind having either a  
24 Westinghouse document or technical report on exactly  
25 what they're going to do so I could actually read it.

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1 CHAIRMAN RAY: What they're going to do in  
2 performing the welds or -

3 MEMBER ARMIJO: Yes, how are the welds  
4 going to be made, and what's the kind of inspection  
5 that's going to be done since there structurally has  
6 to be some volumetric-type inspection.

7 So, I'm presuming that Westinghouse  
8 already has documentation to that affect. So, I'd  
9 like to get copies.

10 MR. WANG: Actually, this is the one - yes,  
11 we have received the document and I'm going to put  
12 this together before you leave this week.

13 MEMBER ARMIJO: Okay. Thank you.

14 MR. WANG: And also the page numbers, I'm  
15 aware the documents will have that information on it.

16 MEMBER ARMIJO: Okay.

17 CHAIRMAN RAY: 52 and 53 the same, Weidong?

18 MR. WANG: Yes.

19 CHAIRMAN RAY: Okay. All right. Now, 55  
20 is back to the testing of the squib valves.

21 Charlie, do you have any comments you want  
22 to make?

23 MEMBER BROWN: Well, Sanjoy brought it up  
24 initially. And then my other comment was - okay. I'm  
25 supposed to look at my latest copy. Excuse me for a

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1 minute to make sure I'm - I know what I'm looking at  
2 here.

3 CHAIRMAN RAY: 55, Page 7.

4 MEMBER BROWN: Yes, yes, yes. Okay.

5 My interest there was what documents - the  
6 actual configuration testing of the squib valves. In  
7 other words, are they tested in the configuration  
8 under which they're actually expected to operate for  
9 the piping configuration, tanks, heads, stuff like  
10 that to see that they actually perform in the same  
11 plant configuration as are expected to operate.

12 CHAIRMAN RAY: Okay. Do you have any -

13 MEMBER BROWN: We haven't gotten anything,  
14 or at least I don't think we have. I haven't seen any  
15 subsequently.

16 CHAIRMAN RAY: Right.

17 MEMBER BROWN: So, we're supposed to -

18 CHAIRMAN RAY: Westinghouse, you okay with  
19 this item?

20 MR. NELSON: Yes.

21 CHAIRMAN RAY: Clearing it out in a three-  
22 day upcoming meeting?

23 MR. NELSON: And I appreciate the  
24 additional clarification, Charlie. That helps.

25 MEMBER BROWN: Yes, I thought we had it

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1 fairly clear. Literally, what's the configuration of  
2 it and how do we document their performance and the  
3 configuration of their testing, per se?

4 Is it equivalent to where it's applied in  
5 the plant? That's all.

6 MR. NELSON: I'd like to point you to some  
7 already documented information. So, we'll work on  
8 that right away.

9 MEMBER BROWN: Okay.

10 CHAIRMAN RAY: All right. Good. Thank  
11 you.

12 56 is yours also, Charlie.

13 MEMBER BROWN: I provided comments some  
14 time ago, didn't bring it with me today, have not seen  
15 any response to those comments.

16 CHAIRMAN RAY: Eileen, do you have any -

17 MS. MCKENNA: Yes, we do have the comments  
18 and we are actually looking into this and having some  
19 - I think there was - this brought up a potentially  
20 good issue here and we are having discussion with  
21 Westinghouse to make sure we understand exactly what  
22 overspeed protection they provided and how it provides  
23 sufficient inroads to itself. We'll have a few people  
24 come back later in November and be a part of the final  
25 story on that.

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1 CHAIRMAN RAY: All right. 57, is this -  
2 Charlie, look at this again and tell me - I've looked  
3 at this a number of times trying to figure out if it  
4 was still an issue.

5 MEMBER BROWN: Yes, there - let me see.  
6 I'm reading it again here. I remember the issue.  
7 There was the issue of contamination off the top  
8 surface of the tank that they brought up, not us.

9 And they said they were putting it about  
10 ten to 12 feet up. And I just asked the question  
11 what's the basis for ten or 12 feet as opposed to a  
12 few feet or -

13 CHAIRMAN RAY: Yes.

14 MEMBER BROWN: In other words, why was that  
15 far enough up to eliminate the problem that they  
16 brought up themselves.

17 MS. MCKENNA: And I spoke with Mr. Roach  
18 earlier this week and he's providing a written  
19 response that we will deliver to the committee as soon  
20 as we receive it.

21 CHAIRMAN RAY: Okay. All right. Weidong,  
22 note that in the comment section.

23 MEMBER ARMIJO: Is that the diesel  
24 generator exhaust or what exhaust is it?

25 CHAIRMAN RAY: Isn't it spent fuel?

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1 MR. CUMMINS: I think it's spent fuel.

2 CHAIRMAN RAY: Yes. Exactly.

3 MR. CUMMINS: Ventilation.

4 CHAIRMAN RAY: Right.

5 MEMBER ARMIJO: Oh, okay.

6 CHAIRMAN RAY: Yes, I mean, I was trying to  
7 see it - haven't we resolved this yet? But it sounds  
8 like there's something in the pipeline and it should  
9 be easily resolved soon.

10 60, we've had extensive discussion and  
11 presentation by Westinghouse. And I guess what is  
12 remaining here is mostly this information about - I  
13 know that the profile of the coating micrographs and  
14 the behavior of the coating, I guess I characterized  
15 it more generally, we had discussion - it's still  
16 open, is what I'm trying to say.

17 Yesterday we had quite a bit of discussion  
18 about water flow over the outside of the containment,  
19 what was assumed and so on.

20 And, Said, would you like to summarize  
21 where you think that stands on that point?

22 MEMBER ABDEL-KHALIK: There was a calc  
23 report or a calc note that Westinghouse was supposed  
24 to provide on the evaporation from the outside surface  
25 and the sensitivity to percentage of dry spots that

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1 Graham was going to review. I would be delighted to  
2 review it.

3 What concerns me is that no one has looked  
4 at the stability. I mean, everybody talks about the  
5 uniformity of the distribution from those rings, but  
6 no one has talked about the stability of the film.

7 This is a classic Marangoni instability  
8 that is caused by surface tension gradient. So, if  
9 someone can figure out - and I tried to lead the  
10 discussion in that direction by asking what the Delta  
11 T is between the hot and dry spot and all that stuff.

12 For the known film condition, meaning film  
13 thickness, film velocity, and the temperature  
14 difference between the hot and dry spot, what is the  
15 Marangoni number, is this film subject to Marangoni  
16 instability so that you will always form rivulets on  
17 the surface rather than a uniform surface?

18 CHAIRMAN RAY: Okay. Now, we - that's well  
19 stated, I think. And the only thing I would add to it  
20 is we do understand, and I think you said clearly as  
21 well, that that question isn't, as far as we can tell,  
22 affected by the amendment.

23 Therefore, it becomes an item that is a  
24 question that maybe should have been asked and  
25 answered earlier. Maybe it was asked and answered

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1 earlier. But it's a question, nevertheless, that we  
2 have to keep track of until we resolve it or decide  
3 we're not going to do anything about it.

4 But I just want Westinghouse to understand  
5 we do understand that this is the question that Said  
6 just described -

7 MEMBER ABDEL-KHALIK: Right. It's not  
8 caused by the -

9 CHAIRMAN RAY: It's not caused by the -

10 MEMBER ABDEL-KHALIK: - or change in the  
11 vent orientation or shape or anything.

12 CHAIRMAN RAY: Yes.

13 MEMBER ABDEL-KHALIK: How stable is this  
14 film given the sensitivity of evaporative cooling  
15 capability to the fraction of the surface that's  
16 assumed to be wet or dry?

17 CHAIRMAN RAY: Yes, go ahead, Sam.

18 MEMBER ARMIJO: I'm listed here as had  
19 questions on water management, and all of those  
20 questions have been answered. So, I don't have any  
21 open issues.

22 CHAIRMAN RAY: Thank you. All right.

23 So, what I'm going to do is parse this  
24 very carefully. Yesterday I indicated that I felt  
25 where we were was there were some items here that got

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1 my name associated with them that do go to the COL  
2 application.

3 We understand that. And so to that  
4 extent, they're not going to continue to be part of  
5 the DCD open items.

6 Then there's the one that Said just  
7 mentioned, and I won't try and restate it. I'll just  
8 tell you that we understand what bucket it belongs in,  
9 but it's still an outstanding issue that we will - if  
10 it's not further addressed, we'll have to identify it,  
11 I presume, as a concern.

12 And, therefore, leave it to you guys, Ed,  
13 to see if you want to say anything more to us. If you  
14 don't, I understand.

15 MR. CUMMINS: No, I think the clarification  
16 just now is even more helpful than - well, we'll take  
17 it under.

18 CHAIRMAN RAY: All right. And I would say  
19 the same thing to you, Eileen. If the staff has any  
20 insight as to how to respond to this concern that was  
21 just described, please bring it to our attention. All  
22 right?

23 MS. MCKENNA: Yes.

24 CHAIRMAN RAY: Okay. 62.

25 MR. SISK: Excuse me, Chairman.

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1 CHAIRMAN RAY: Yes.

2 MR. SISK: The Item 3 -

3 CHAIRMAN RAY: Okay, Rob.

4 MR. SISK: - on 60.

5 CHAIRMAN RAY: Yes. Yes, I'm sorry. Yes,  
6 I mentioned that and I failed to include it in my  
7 final summary.

8 As far as I know, again the same thing  
9 would apply to it. I don't believe there's anything  
10 that the amendment has done to affect the question of  
11 how this coating can be expected to perform, which is  
12 fundamentally what he's asking about based on what do  
13 we know about how it is bonded.

14 Now, one might say well, gee, that's  
15 really a COL question. I mean, the design is the  
16 design. How it actually ends up being verified, I  
17 guess, in the field is maybe something that one could  
18 say well, that's something we could ask the COL  
19 applicant.

20 But nevertheless, there is this question.  
21 I think it does - you're right to remind me that it's  
22 not yet resolved.

23 I want to try and close this bigger open  
24 item because it was so broad and had so much stuff in  
25 it, and try and narrow things down and put them in the

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1 right categories going forward. And that's what I'm  
2 trying to do here.

3 MEMBER ARMIJO: I think Sanjoy was really  
4 just asking for a document to show what Westinghouse  
5 knew about the interface bond between the coating and  
6 the steel.

7 CHAIRMAN RAY: Yes.

8 MR. SISK: Right -- was going to provide an  
9 item.

10 CHAIRMAN RAY: Yes.

11 MEMBER ARMIJO: So, I don't know if we've  
12 received that and --

13 CHAIRMAN RAY: I don't believe we have.  
14 At least not to my knowledge. In any event, we should  
15 track it and we will do so, but we're going to close  
16 this open item because it's got too many piece parts  
17 to it that I don't want to keep it hanging out there  
18 the way it is.

19 All right. 62.

20 MEMBER ABDEL-KHALIK: I'm sorry, sir.

21 CHAIRMAN RAY: Yes, sir. All right.

22 MEMBER ABDEL-KHALIK: So, you're going to  
23 replace this Item 60 with a follow-up item on the  
24 Marangoni instability -

25 CHAIRMAN RAY: I am.

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1 MEMBER ABDEL-KHALIK: Okay.

2 CHAIRMAN RAY: That's right. And a  
3 separate one on Sanjoy's question.

4 MEMBER ABDEL-KHALIK: Okay. Thank you.

5 CHAIRMAN RAY: Yes. It may seem like this  
6 is a lot of silly bookkeeping, but the point is it's  
7 really important that we, as we get down to the last  
8 night here, we know what bucket which thing is in and  
9 what it consists of.

10 Okay. 62 is - has to do with the seismic  
11 area. And I don't know - do we know anything,  
12 Weidong, about what the status of -

13 MR. WANG: For these, 62 and 63 is for the  
14 summer steel air. And 64 is -

15 CHAIRMAN RAY: All right. You're right. I  
16 should have noticed that. Sorry.

17 MR. WANG: And then right now I think still  
18 stable.

19 CHAIRMAN RAY: All right. I'm not worried  
20 about it if that's what it's for. I've sort of got  
21 the blinders on right now. And so that's true through  
22 to 64.

23 65 we're going to get to today.

24 MEMBER ARMIJO: Harold?

25 CHAIRMAN RAY: Yes.

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1 MEMBER ARMIJO: I'm listed as asking this  
2 question on Item 64.

3 CHAIRMAN RAY: Yes.

4 MEMBER ARMIJO: And I believe it was  
5 answered during the meeting. So, I don't have any  
6 issue -

7 CHAIRMAN RAY: Okay.

8 MEMBER ARMIJO: - about the handling of  
9 hydrogen and -

10 CHAIRMAN RAY: If nobody has any other  
11 objection, we'll close it then. All right.

12 65 we're going to deal with here shortly.

13 66, I believe that's true as well. 67 is - it says  
14 Westinghouse, but I thought I was -

15 MS. MCKENNA: That was to be a Vogtle item  
16 and staff is ready on that one when -

17 CHAIRMAN RAY: Okay. Great. Yes, let's  
18 changed the designation to Vogtle.

19 68, I believe this is GSI-191. And I need  
20 to check with Sanjoy as to whether there's - as far as  
21 I know, it remains an open item.

22 If anybody else who was present here could  
23 reduce it or modify it or clarify it, I'd be happy to  
24 take the input. But in his absence, I don't want to  
25 do anything to change it.

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1           There was a visitation to a Westinghouse  
2 facility since our last meeting. And Sanjoy is going  
3 to report on that.

4           69, that same thing is true. 70, Graham,  
5 is this yours?

6           DR. KRESS: That's mine.

7           CHAIRMAN RAY: I'm sorry. Tom, yes.  
8 That's right.

9           DR. KRESS: The issue there was for, in the  
10 core, the boron composite on the tubing -

11          CHAIRMAN RAY: Right.

12          DR. KRESS: But if the concentration of  
13 boron is lower than its precipitation level, it will  
14 just wash it off. And Westinghouse made an analysis  
15 and said yes, it was. But that analysis was strictly  
16 based on a 50 percent quality carryover of the liquid.

17           And it was correct for that 50 percent  
18 carryover, but it doesn't take much less carryover  
19 until you'd exceed the precipitation level at these  
20 temperatures.

21           So, my issue there was what's the basis of  
22 50 percent carryover? We need to look at that a  
23 little more carefully.

24           If it's a little bit less like 40 percent,  
25 well, then you're above the precipitation level and

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1 you could not wash the stuff of the tool and it could  
2 inhibit the cooling.

3 CHAIRMAN RAY: Yes.

4 DR. KRESS: That was the issue.

5 CHAIRMAN RAY: You were very clear about  
6 that, I thought.

7 Westinghouse, do you need any more input  
8 on that point?

9 MR. NELSON: We're planning to address -  
10 this is Mike Nelson.

11 We're planning to address - 17th through  
12 the 19th.

13 CHAIRMAN RAY: All right.

14 MR. NELSON: Including 71.

15 CHAIRMAN RAY: And 71, again, was what led  
16 to this visit that I mentioned that's occurred, but  
17 Sanjoy is not here at the moment. I believe it's  
18 still open. We'll leave it open.

19 All right. That completes the review of  
20 the action item list. It's 20 minutes after 9:00.  
21 Eileen, do you still want to wait until 9:45 to begin?

22 MS. MCKENNA: No, the staff is here and I  
23 believe Westinghouse is ready. So, we're prepared to  
24 begin the discussion of the follow-up issues. I think  
25 we are ready, and we just need to get some techs on

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1 line and check the room kind of thing because there is  
2 proprietary information.

3 CHAIRMAN RAY: Yes. Thank you. We'll do  
4 that. We're going to now enter closed session at  
5 which proprietary information will be discussed.

6 Westinghouse, I assume you're ready?

7 MS. SISK: We have to set up.

8 CHAIRMAN RAY: Okay. Fine. Weidong, will  
9 you let me know then - you guys can go ahead and take  
10 your places.

11 (Whereupon the open session was adjourned  
12 at 9:22 p.m.)

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# ACRS Action Item #41 Reactor Trip Circuit Breaker Testing

DCD Chapter 16 - Tech Specs

Bob Seelman – NPP Licensing

John Ewald – NPP ESI

November 03, 2010

WESTINGHOUSE NON-PROPRIETARY CLASS 3

# ACRS Action Item #41

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RTCB test frequency...

Need to know more in operating experience

Discuss basis for yearly testing

# RTCB History in Westinghouse Plants

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## ● INPO Westinghouse Plant History 2000 to Present

- 17 cases of RTCB issues
- 3 cases of RTCB failure to trip
  - *1 under voltage (UV) trip failed during testing, but shunt trip passed*
  - *1 trip failed during shutdown (S/D) testing due to mechanical failure of breaker*
  - *1 UV trip failed during S/D testing due to UV driver this prevented auto trip but not manual trip*
- 5 cases of RTCB failure to close or reset
- 5 cases of inadvertent trip of RTCBs during maintenance
- 4 cases of RTCB defects identified during S/D maintenance, none that would have prevented RTCB opening

# Reference OI-SRP7.2-ICE-03

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Westinghouse stated that each individual RTCB would be opened during a trip actuation device operational test once per year. In current licensed plants, the maximum length of time between openings of RTCBs (or equivalent) is typically 92 days. This issue is discussed in Chapter 16 of NUREG-1793 and this supplement. This issue was determined to be adequately addressed in Revision 15 of the DCD and no changes were made to RTCB layout or design, including the periodicity of RTCB testing. Therefore, OI-SRP7.2-ICE-03 is considered resolved.

# Conclusion

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- There was only one breaker failure in the Westinghouse operating fleet in the last 10 years that would have prevented the opening of the reactor trip breaker. In AP1000 we only need 2 breakers out of the eight to function in order to ensure a reactor trip.
- Based on the historical low failure rate of RTCBs, combined with the increased redundancy in the AP1000 RTCB configuration, it is reasonable engineering judgement to conclude that the 92 day staggered testing frequency is acceptable.

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# Questions?