Stamm, Eric

From: Michel, Eric <R2
Sent: Tuesday, August 25, 2009 10:55 AM
To: Franke, Mark
Cc: Riggs, Eric
Subject: FW: OCO phone call
Attachments: Document.pdf

Thanks.

Eric

From: Riggs, Eric
Sent: Tuesday, August 25, 2009 10:40 AM
To: Michel, Eric
Subject: RE: OCO phone call

Eric,

Sorry that I'm delayed in responding - came in late [due to a migraine.] EX. 6

Unit 2 entered the 7 day portion of TS 3.10.1 at 2113 on Aug 18, so the 7 day completion time expires at 2113 tonight. At that time, the unit will transition to condition F, which allows 45 days for maintenance per calendar year/ Per the bases, when condition F is entered, the start time is backed up to the original 7 day start time (Aug 18 at 2113). To be clear, each unit has its own 45 day clock per calendar year. So Unit 2 entering its 45 day AOT has no impact on Units 1 and 3.

Currently, Units 1 and 3 are in the same 7 day portions of TS 3.10.1 due to cutting the Unit 2 SSF ASW piping in the SSF pump room, which impacts the seismic qualification and restraint of the other two units' ASW piping. This condition was entered at 1400 on Aug 23. If for some reason, the piping was not restored and declared operable, Units 1 and 3 would transition to condition F on Aug 30 at 1400. This is an example of the units' using their individual clocks....

Thanks,

Eric

From: Michel, Eric
Sent: Tuesday, August 25, 2009 6:57 AM
To: Franke, Mark
Cc: Riggs, Eric
Subject: RE: OCO phone call

Mark,

Yes, it looks like they're in 3.0.3.

Eric R - am I reading that correctly?

Eric

From: Franke, Mark
Sent: Monday, August 24, 2009 5:59 PM

B/22

To: Michel, Eric
Subject: Re: OCO phone call

Thanks for the update. Is the 45 day clock a shutdown clock?

This email is being sent from an NRC Blackberry device.

From: Michel, Eric
To: Franke, Mark
Sent: Mon Aug 24 16:58:27 2009
Subject: OCO phone call

Mark,

Just to keep you up to speed, we had two calls regarding OCO's leaking SSF EFW piping. One internal and the other with the licensee. They plan on requesting "relief," although what exactly for I don't really follow. They want to use GL 90-05, but I don't think (and we've gotten some support from NRR on this) that it's applicable in this situation, because the repair does not require them to shut down. They claim they've done similar things in the past. They asked for the possibility of another call to help clear this up.

Over all it sounds like it'll be a Code repair. The "repair" is actually a modification, but the Code includes modifications in it's definition of repairs. The intent is to bypass the buried leg of pipe with a new run that isn't 24' underground. Timing seems to be the big issue.

There was a lot of discussion with the residents regarding their 45 day AOT for the SSF.

Eric

3.10 STANDBY SHUTDOWN FACILITY

3.10.1 Standby Shutdown Facility (SSF)

LCO 3.10.1 The SSF Instrumentation and the following SSF Systems shall be OPERABLE:

a. SSF Auxiliary Service Water System;

b. SSF Portable Pumping System;

c. SSF Reactor Coolant Makeup System; and

d. SSF Power System.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

NOTE
LCO 3.0.4 is not applicable.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. SSF Auxiliary Service Water System inoperable.	A.1 Restore SSF Auxiliary Service Water System to OPERABLE status.	7 days
B. SSF Portable Pumping System inoperable.	B.1 Restore SSF Portable Pumping System to OPERABLE status.	7 days

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. SSF Reactor Coolant Makeup System inoperable.	C.1 Restore SSF Reactor Coolant Makeup System to OPERABLE status.	7 days
D. SSF Power System inoperable.	D.1 Restore SSF Power System to OPERABLE status.	7 days
E. SSF Instrumentation inoperable.	E.1 Restore SSF Instrumentation to OPERABLE status.	7 days
F. Required Action and associated Completion Time of Condition A, B, C, D, or E not met when SSF Systems or Instrumentation are inoperable due to maintenance.	F.1 Restore to OPERABLE status.	----------NOTE---------- Not to exceed 45 days cumulative per calendar year ---------- 45 days from discovery of initial inoperability
G. Required Action and associated Completion Time of Condition F not met. OR Required Action and associated Completion Time of Condition A, B, C, D, or E not met for reasons other than Condition F.	G.1 Be in MODE 3. AND G.2 Be in MODE 4.	12 hours 84 hours

BASES (continued)

APPLICABILITY

The SSF System is required in MODES 1, 2, and 3 to provide an alternate means to achieve and maintain the unit in MODE 3 with average RCS temperature ≥525°F (unless the initiating event causes the unit to be driven to a lower temperature) following 10 CFR 50 Appendix R fire, turbine building flood, sabotage, SBO and tornado missile events. The safety function of the SSF is to achieve and maintain the unit in MODE 3 with average RCS temperature ≥ 525°F (unless the initiating event causes the unit to be driven to a lower temperature); therefore, this LCO is not applicable in MODES 4, 5, or 6.

ACTIONS

The exception for LCO 3.0.4, provided in the Note of the Actions, permits entry into MODES 1, 2, and 3 with the SSF not OPERABLE. This is acceptable because the SSF is not required to support normal operation of the facility or to mitigate a design basis accident.

A.1, B.1, C.1, D.1, and E.1

With one or more of the SSF Systems inoperable or the required SSF instrumentation of Table B 3.10.1-1 inoperable, the SSF is in a degraded condition and the system(s) or instrumentation must be restored to OPERABLE status within 7 days. The 7 day Completion Time is based on the low probability of an event occurring which would require the SSF to be utilized.

F.1

If the Required Action and associated Completion Time of Condition A, B, C, D, or E are not met when SSF Systems or Instrumentation are inoperable due to maintenance, the unit may continue to operate provided that the SSF is restored to OPERABLE status within 45 days from discovery of initial inoperability.

This Completion Time is modified by a Note that indicates that the SSF shall not be in Condition F for more than a total of 45 days in a calendar

BASES

ACTIONS

F.1 (continued)

year. This includes the 7 day Completion Time that leads to entry into Condition F. For example, if the SSF ASW System is inoperable for 10 days, the 45 day special inoperability period is reduced to 35 days. If the SSF ASW System is inoperable for 6 days, Condition A applies and there is no reduction in the 45 day allowance. The limit of 45 days per calendar year minimizes the number and duration of extended outages associated with exceeding the 7 day Completion Time of a Condition.

G.1 and G.2

If the Required Action and associated Completion Time of Condition F are not met or if the Required Action and associated Completion Time of Condition A, B, C, D, or E are not met for reasons other than Condition F, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to MODE 3 within 12 hours and MODE 4 within 84 hours. The allowed Completion Times are appropriate, to reach the required unit conditions from full power conditions in an orderly manner and without challenging plant systems, considering a three unit shutdown may be required.

SURVEILLANCE REQUIREMENTS

SR 3.10.1.1

Performance of the CHANNEL CHECK once every 7 days for each required instrumentation channel ensures that a gross failure of instrumentation has not occurred. A CHANNEL CHECK is normally a comparison of the parameter indicated on one channel with a similar parameter on other channels. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations between the two instrument channels could be an indication of excessive instrument drift in one of the channels or of something even more serious. A CHANNEL CHECK will detect gross channel failure; therefore, it is key in verifying that the instrumentation continues to operate properly between each CHANNEL CALIBRATION. This SR is modified by a Note to indicate that it is not applicable to the SSF RCS temperature instrument channels, which are common to the RPS RCS temperature instrument channels and are normally aligned through a transfer isolation device to each Unit control room. The instrument string to the SSF control room is checked and calibrated every 18 months

Agreement criteria are determined based on a combination of the channel instrument uncertainties, including indication and readability. If a