PMTurkeyCOLPEm Resource

From: Comar, Manny
Sent: Tuesday, July 26, 2011 5:14 PM
To: orthen, Richard; Raymond Burski; Steve Franzone; STEVEN.HAMRICK; TurkeyCOL Resource; William Maher
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Subject: Draft RAI 5682 related to SRP Section 14.03.10 - Emergency Planning - ITAAC for the Turkey Point Units 6 and 7 combined license application.
Attachments: draft RAI 5682_TPN.doc

To All,

Attached is the Draft RAI 5682 related to SRP Section 14.03.10 - Emergency Planning - ITAAC for the Turkey Point Units 6 and 7 combined license application.

If you need a conference call to discuss the question(s) of the draft RAIs please contact me at 301-415-3863. Unless you request additional clarification we will normally issue the RAI as final within 3 to 5 days, from today.

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Turkey Point Units 6 and 7
Florida P and L
Docket No. 52-040 and 52-041
SRP Section: 14.03.10 - Emergency Planning - Inspections, Tests, Analyses, and Acceptance Criteria
Application Section: Part 10: ITAAC

QUESTIONS for Licensing and Inspection Branch (NSIR/DPR/LIB) (EP)

14.03.10-***

Part 10, Tier 1/ITAAC - COL application Part 10, "License Conditions and ITAAC" (Revision 2, December 21, 2010), includes emergency planning (EP) ITAAC in Table 3.8-1, "Emergency Plan Inspections, Tests, Analyses, and Acceptance Criteria." Please address the following comments by making the identified revisions (including any other conforming or necessary changes), or explain why the revisions are not appropriate:

a. In ITAAC 1.1.1, revise the inspections, tests, analyses to replace "each control room, the" with "the control room," and replace "from each unit" with "for the unit". In addition, revise the acceptance criterion to replace "each control room" with "the control room", and replace "from each unit" with "for the unit". Since the EP ITAAC table will be duplicated and attached to the combined license (COL) for both Unit 6 and Unit 7, the appropriate reference should be to a single control room, rather than control rooms.

b. In ITAAC 2.1, revise the acceptance criterion to replace "each control room" with "the control room".

c. In ITAAC 3.1, revise the EP program element to replace "control rooms" with "control room". Revise the inspections, tests, analyses to replace "from each control room" with "from the control room", and replace "with each control room" with "with the control room". Revise acceptance criterion to replace the two references to the "control rooms" with "control room".

d. In ITAAC 3.2, revise the EP program element to replace "control rooms" with "control room". Revise the inspections, tests, and analyses to replace "each operating control room" with "the control room". Revise the acceptance criterion to replace "each control room" with "the control room".

e. In ITAAC 5.1 inspections, tests, analyses, delete the second sentence, which reads: "These facilities will meet the criteria of NUREG-0696 with exceptions."

f. In ITAAC 5.1.1, the acceptance criterion states that the TSC size is consistent with NUREG-0696, and does not specify the actual size; which would be determined by the specific number of staff (at 75 square feet/person). Since there will be a common TSC for Units 3, 4, 6 and 7, the TSC size is likely to be greater than the 1875 square feet of floor space indicated in AP1000 DCD Tier 1 Table 3.1-1. Revise acceptance criterion 5.1.1 to specify the common TSC size, consistent with the proposed facility staffing (see, for example, ITAAC acceptance criterion 5.2.1).

g. In ITAAC 5.1.3, revise the acceptance criterion to replace "between each control room, the OSC, and EOF" with "between the control room, TSC, OSC, and EOF."

h. In ITAAC 5.1.5, the acceptance criterion does not identify what plant and environmental information is available in the TSC (e.g., where it is listed in the COL application or AP1000 DCD). Revise the acceptance criterion to clearly identify the source/listing of the available information/parameters (see also, comment to ITAAC 5.2.3, below). In addition, delete the last sentence in the acceptance criterion, which

reads: "These capabilities have been demonstrated during testing and acceptance activities." This sentence seems more appropriate for the inspections, tests, analyses column, and appears to be covered by the existing (first) sentence under 5.1, which reads: "An inspection of the TSC and OSC will be performed, including a test of their capabilities.

i. In ITAAC 5.1.7, revise the acceptance criterion to replace "control room(s)" with "control room".

j. In ITAAC 5.1.8, revise the acceptance criterion to replace "each control room" with "the control room".

k. Add a new ITAAC acceptance criterion 5.1.9, which states: "Controls and displays exist in the TSC to control and monitor the status of the TSC ventilation system including heating and cooling, and the activation of the high-efficiency particulate air (HEPA) and charcoal filter system upon detection of high radiation in the TSC." (See Vogtle COLA Unit 3 EP ITAAC 5.1.8, which addresses habitabilty for a separate TSC.)

l. The COL application references the AP1000 standard design, which includes ITAAC associated with emergency response facilities in DCD Tier 1 Table 3.1-1, "Inspections, Tests, Analyses, and Acceptance Criteria." The ITAAC in this table associated with the TSC and Operations Support Center (OSC) are replaced by ITAAC in COL application Part 10 Table 3.8-1. To the extent that the Table 3.8-1 ITAAC represent a replacement of the comparable Table 3.1-1 ITAAC, submit an appropriate exemption request that addresses this Tier 1 departure, pursuant to Section VIII.A.4 of Appendix D to 10 CFR Part 52.

m. In ITAAC 5.2.1, delete the two bullets in the acceptance criterion. Since the existing emergency operations facility (EOF) supporting Units 3 and 4 will be used for Units 6 and 7, the location and adequacy of the EOF building is outside of the scope of the staff's review of the COL application, pursuant to Section 13.3, "Emergency Planning" (Subsection I, "Areas of Review"), of NUREG-0800.

n. In ITAAC 5.2.2, revise the acceptance criterion to replace "control rooms" with "control room".

o. In ITAAC 5.2.3, revise the acceptance criterion to clearly identify the source/listing of the plant system data (or other plant parameteres) that will be displayed in the EOF (see also, comment to ITAAC 5.1.5, above).

p. In ITAAC 6.1, revise the acceptance criterion to replace "in each control room, and for each unit in the TSC" with "in the control room, TSC".

q. In ITAAC 6.4, revise the acceptance criterion to replace "control room(s)" with "control room".

r. ITAAC 8.1.1.C.1.a (regarding TSC command and control demonstration), and 8.1.1.D.1 and 8.1.1.D.1.a (regarding OSC, TSC, and EOF activation), indicate demonstration of the acceptance criterion "within 90 minutes" of the event classification. Explain the basis for the 90-minute criteria, and whether it is related to the 90-minute augmentation time in COLA Part 5 Table B-1b, "Staffing Requirements for the Turkey Point Plant Emergency Response Organization." If the 90-minute acceptance criteria are related to, or dependent upon Table B-1b, revise the time to be consistent with any changes to Table B-1b that result from your responses to NRC RAI 5681 (e.g., RAI B-6 through B-13), if appropriate.

s. Add a new ITAAC acceptance criterion 8.1.1.D.2.d, which states: "Demonstrate the capability of TSC and EOF equipment and data displays to clearly identify and reflect the affected unit." (See Vogtle COLA Unit 3 EP ITAAC 8.1.1.D.2.d, which addresses human factors engineering.)

t. In ITAAC 8.1.1.D.3, identify the first acceptance criterion with "a." before "Emergency response communications listed in EPIPs are available and operational." In addition, renumber a., b., and c. as b., c., and d.

u. In ITAAC 8.1.3, revise the acceptance criterion to replace "or a license condition requiring offsite" with "or a license condition requires offsite".

v. In ITAAC 8.1.1.E.2, change "ERO personnel." to "ERO personnel.)" in Standard Criterion a., and delete the duplicate Standard Criterion "b."