

NRR-PMDAPEm Resource

From: Paige, Jason
Sent: Thursday, September 29, 2011 4:01 PM
To: Tomonto, Bob
Cc: Hanek, Olga
Subject: Turkey Point Units 3 and 4: TSTF-448 LAR - Requests for Additional Information- Round 2

Bob,

As discussed during the September 2, 2011, call, below are follow-up RAIs from your July 18, 2011, submittal. The first question asks you to clarify the statement “staggered test basis” (during the call you stated you would also provide clarification in the bases) and the second question asks you to provide acceptable language regarding chemical and smoke hazards. Also discussed during the call was: 1) provide clarification of “staggered test basis” in TS 6.8.4.k.d (not required, only a suggestion), 2) reviewer suggested to make basis for TS 3.7.5 consistent with TS language... “...within 42hrs” vs. “...within 12hrs and in cold shutdown within the following 30hrs,” and 3) revise a.5 language regarding specifically calling out mitigating action (acceptable language sent in an email dated September 6th). If you have any questions, feel free to contact me. Let me know if a call is needed or I will proceed with formally issuing the RAIs.

1. With respect to the agreed upon clarification, it is the NRC staff’s understanding that the typical use to the phrase, “testing on the staggered test basis”, refers to testing systems that contain two or more redundant trains of equipment where the redundant trains are to be tested on a staggered test basis. However, in accordance with your response to the staff’s request for additional information dated July 18, 2011, we understand that you will be testing redundant components of a single train every 36 months on a staggered test basis.

You referred to Technical Specification (TS) Surveillance Requirement (SR) 4.7.5.d as the basis for the Turkey Point yearly recirculation test. Currently, it appears that the only purpose of SR 4.7.5.d is to test the pressure drop across the HEPA filter and charcoal absorber every 12 months at a flow rate of 1000 cfm \pm 10%. We believe it should be made clear that SR 4.7.5.d has the additional functions of testing components on a staggered test basis and measuring CRE pressure relative to external areas adjacent to the CRE boundary. It is not clear that measuring the flow rate and pressure drop every 12 months is consistent with every 36 months on a staggered test basis (i.e. one component every 18 months).

2. As committed during the September 2, 2011, call, provide acceptable language consistent with the intent of TSTF-448, Revision 3 regarding chemical and smoke hazards. The suggested wording, “verify mitigating actions ensure CRE occupant radiological and chemical hazards will not exceed limits, and CRE occupants are protected from smoke hazards,” in the NRC staff’s RAI dated June 16, 2011, is considered acceptable.

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Hearing Identifier: NRR_PMDA
Email Number: 161

Mail Envelope Properties (Jason.Paige@nrc.gov20110929160000)

Subject: Turkey Point Units 3 and 4: TSTF-448 LAR - Requests for Additional Information-
Round 2
Sent Date: 9/29/2011 4:00:54 PM
Received Date: 9/29/2011 4:00:00 PM
From: Paige, Jason
Created By: Jason.Paige@nrc.gov

Recipients:
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Tracking Status: None

Post Office:

Files	Size	Date & Time
MESSAGE	2911	9/29/2011 4:00:00 PM

Options
Priority: Standard
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Expiration Date:
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