

PMTurkeyCOLPEm Resource

From: Comar, Manny
Sent: Tuesday, December 06, 2011 8:48 AM
To: orthen, Richard; Raymond Burski; Steve Franzone; STEVEN.HAMRICK; TurkeyCOL Resource; William Maher
Subject: Draft RAI 6176 related to SRP Section 18 - Human factors engineering for the Turkey Point Units 6 and 7 combined license application.
Attachments: draft RAI 6176_TPN.doc

To All,

Attached is the draft of RAI No:6176, regarding section 18 Human factors Engineering 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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Request for Additional Information No. 6176

Turkey Point Units 6 and 7
Florida P and L
Docket No. 52-040 and 52-041
SRP Section: 18 - Human Factors Engineering
Application Section: 18.2

QUESTIONS from Operating Licensing and Human Performance Branch (AP1000/EPR Projects)
(COLP)

18-***

Evaluation:

The information provided in the Turkey Point COL application, revision 2, for PTN COL action item 18.2-2 does not address the changes that were made to the information item in revision 18 of the AP1000 design certification. The revised COL information item no longer includes EOF location and includes the additional areas bolded below:

“Specific information regarding **EOF and TSC communications, and EOF and TSC human factors attributes** will be provided by the Combined Operating License applicant to address the Combined License information requested in this subsection.”

The standard response received in other applications has been something similar to, “The EOF and TSC communication strategies, as well as the EOF and TSC human factors attributes, are described in the emergency plan.” Typically, EOF and TSC human factors attributes are not explicitly described in the emergency plan. As an alternative the staff has accepted a statement that the EOF and TSC designs incorporate NUREG-0696 guidance. The staff assumed you would follow the standard response and reviewed the Turkey Point Emergency Plan, Revision 2. The staff found the EOF design specifically addressed NUREG-0696 but the TSC reference was too generic. Section H.1.b (page H-2) of the emergency plan states:

“The TSC meets **most** of the requirements of NUREG-0696, *Functional Criteria for Emergency Response Facilities* and RG 1.206, *Combined License Applications for Nuclear Power Plants*.” (Emphasis added)

This statement is not sufficiently specific for the staff to draw a conclusion.

Question:

1. Revise the response to COL information item 18.2-2 so it reflects the latest revision in the DCD.
2. If the standard COL information item response is used, provide a more specific reference to NUREG-0696 (similar to the reference used for the EOF.)