

## NRR-PMDAPEm Resource

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**From:** Feintuch, Karl  
**Sent:** Wednesday, July 11, 2012 1:04 PM  
**To:** Feintuch, Karl  
**Subject:** Record of ME7110 - Kewaunee - "Chi-Over-Q" - progress review [dated Wed 7/11/2012 3:00 PM - 4:00 PM from Outlook invitation]  
**Attachments:** ME7110- Kewaunee LAR 244: Executive Summary of LRA Emergent Issue - further information - generic implications for other plants

To: Blumberg, Mark; Brown, Leta; Torres, Roberto; Walker, Harold; Alvarado, Rossnyev; Hamm, Matthew; Sun, Summer; Guzzetta, Ashley; Lapinsky, George; ONeal, Daniel; HQ-OWFN-08B06-12p; Frankl, Istvan  
Subject: ME7110 – Kewaunee – “Chi-Over-Q” - progress review [dated Wed 7/11/2012 3:00 PM - 4:00 PM]  
Location: HQ-OWFN-08B06-12p

Note meeting room location. Forward the invitation as needed. The meeting will begin at 3:00 PM (with due consideration for the changeover of conference room occupants).

Bridge line information **888-390-0682** pass code **34352**#. Capacity is 5 lines, expecting George and Rossnyev by phone.

### Agenda – from email sent Wednesday, July 11, 2012 10:20 AM

-----Original Message-----

From: Feintuch, Karl  
Sent: Wednesday, July 11, 2012 10:20 AM  
To: Blumberg, Mark; Brown, Leta; Walker, Harold; Alvarado, Rossnyev; Hamm, Matthew; Sun, Summer; Guzzetta, Ashley; Lapinsky, George; ONeal, Daniel; Torres, Roberto  
Cc: Frankl, Istvan  
Subject: RE: ME7110 – Kewaunee – “Chi-Over-Q” - progress review meeting 2012-07-11 agenda

Yes, we are having a meeting.

The agenda will be to discuss whether the information (between ===== marks below) provided last night by Kewaunee is persuasive to continue forward movement on ME7110. Preceding the Kewaunee message I had informed Kewaunee that a 4 month delay associated with their resolution of the Locked Rotor Accident (LRA) analysis issue (loss of fan cooling to CRDM remediated by removal of diffusers and mufflers on main steam line relief valves) was not sustainable.

In its email message below Kewaunee asserts that it can accomplish the needed remediation by completion of the reanalysis of the LRA by August 30, 2012, coupled with hardware changes completed during a refueling, or forced, outage. Further, it cites Millstone as a successful fleet experience with this modification.

Kewaunee / Dominion Email message is reproduce below followed by the executive summary preceding it. In case of a conflict between like information, defer to the email message of July 10, 2012:

===== begin Kewaunee message of July 10, 2012 =====

From: Craig D Sly [<mailto:craig.d.sly@dom.com>]

Sent: Tuesday, July 10, 2012 6:22 PM

To: Feintuch, Karl

Subject: LAR 244 X/Q

Karl,

*I have discussed the topic of our phone call yesterday (with respect to the status and fate of LAR 244) with my management. I recall that you said you have a meeting with your team on Wednesdays so I figured I'd get this to you today so that you have it for your meeting tomorrow. The input I have received from my management is as follows.*

- *My management would like to do everything possible to avoid having to withdraw this amendment. We would all hate to lose the progress we have made and have to start over again.*

- Resources have been dedicated to revising the locked rotor analysis and Dominion is prepared to commit to completing and submitting the revised analysis by August 30, 2012.
- There was some concern expressed regarding the proposed modification to remove the PORV exhaust mufflers/diffusers. The modification to remove the PORV exhaust mufflers/diffusers has been scoped and determined to be feasible. The actual design work has not yet been completed but the modification has been approved by the Plant Health Committee. The mufflers/diffusers are in place for employee hearing protection and removal will require that employees working on the roof or near the exhaust pipes wear hearing protection in the future. One of the Millstone plants has done this mod in the past so this is not an unprecedented modification. We are internally committed to perform this modification. Completion of this modification cannot occur unless the plant is shutdown (refueling or forced outage) for safety reasons and would be a condition for full implementation of the amendment.

I would propose that you present this to your team and let me know if we need to have additional communication on this.

Regards,  
 Craig Sly  
 Dominion Resources Services, Inc.  
 Nuclear Licensing and Operations Support  
 W: 804-273-2784  
 C: 804-241-2473

=====  
 ===== end Kewaunee message =====  
 ===== begin executive summary =====  
 [see attachment]  
 ===== end executive summary =====

More than AADB reviewers are stakeholders in this decision. Some of the rest of you may have schedule or content issues that challenge a success for this project. Additionally, we pick up possible participation in the review by other Tech Branches (Component Performance (EPTB); Mechanical Engineering (EMCB); and Balance of Plant (SBPB) all come to mind. There may be more). Further, after removal of mufflers, personnel in close proximity need to wear single or double ear protection (an additional aspect of human performance). [SRXB may have an interest in the LRA different than at the time of the original application.]

There is a question of whether this modification is a means of accomplishing ME7110 or that the totality of this action may have outgrown the proposed ME7110 LAR as originally envisioned by the licensee and as acceptance reviewed by the NRC. AND the metric clock was already running to be within - but approaching - 24 months, before the LRA issue surfaced.

On the licensee's positive side, their senior management is "fully committed" to supporting the continuation of ME7110 with whatever resources are needed. (I plan to exercise that motivation to eliminate the chronic RAI response delays.). Further, Sly expressed confidence that weather data issues have been resolved (I asked specifically about this - Leta will tell us.)

Regarding the pending RAI response to Torres and Brown - expect Torres responses in 1-2 weeks and expect Brown responses in 2-3 weeks.

We will control this afternoon's meeting by the clock: I don't presume we will resolve this concern in one meeting; without further dialog with the licensee; or without engagement with stakeholder BCs.

Attend if you are concerned with whether this project proceeds, goes to withdrawal, or needs substantiation by you for any potential denial decision.

Bridge line information will be distributed by an update to the Outlook invitation.

Please brief you respective BCs in case they want to input information into this process.

Karl

-----Original Message-----

From: Alvarado, Rosshyev  
 Sent: Wednesday, July 11, 2012 8:51 AM  
 To: Feintuch, Karl  
 Subject: RE: ME7110 – Kewaunee – “Chi-Over-Q” - progress review

Karl,  
Are we having a meeting today? I am out of the office, but I can call in.  
Ross

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From: Feintuch, Karl  
Sent: Wednesday, June 27, 2012 1:56 PM  
To: Blumberg, Mark; Brown, Leta; Torres, Roberto; Walker, Harold; Alvarado, Rossnyev; Hamm, Matthew; Sun, Summer; Guzzetta, Ashley; Lapinsky, George; O'Neal, Daniel  
Subject: ME7110 – Kewaunee – “Chi-Over-Q” - progress review  
When: Wednesday, June 27, 2012 3:00 PM-4:00 PM.  
Where: O-8B6, call 415-3079 to reach my cell phone

===== Update 2012-06-27-1350 ET =====

The meeting preceding us was canceled in deference to the NRR meeting. If practical for you, please attend starting at 3:00 PM

===== Update 2012-06-27-1030 ET =====

Start time is 3:15 PM again.

Today's project review will again exchange information about the current status of the project. I received the following response when I asked the Senior Resident for a background on this amendment and the persistence in applying for it:

Kewaunee was granted the Alternate Source Term, license amendment in the 2002-2003 timeframe. As part of that review, the NRC did not question where the licensee's Chi/Q original license basis values came from (a typically standard question from Leida [Leta] Brown, who was not involved with Kewaunee's AST). When the licensee identified that control room inleakage numbers were not a their design values, and NRR began to look at Kewaunee's AST, the question was asked, please provide the basis and calcs. for your Chi/Q numbers. The licensee could not find them. But, the licensee committed to recreating them. When the licensee tried to recreate the original Chi/Q values using the known methodologies, they could not reproduce the original license basis results. The results showed the original Chi/Q values were nonconservative. Therefore, the licensee needs new NRC approved Chi/Q values. Their current operability determination has in place compensatory measures, which prevent the licensee from exceeding operator control room doses.

Regarding RAI traffic:

- On-time or close to on-time: Alva-008, -009, Torres-004 to -012 - on or about 6/29/2012
- Delayed: Brown-001 thru -004 because of challenges with -001 and -004 – no date specified yet, will ask later this week.

We will call George from meeting room.

Note meeting room location. Forward the invitation as needed.

===== original message =====

This meeting is a continuation of our ME7110 project monitoring meeting, to meet weekly with a fixed agenda, with a variable attendance and allowing liberal excuse criteria.

ME7110 – Kewaunee – “Chi-Over-Q” does not yet have a clear success path. The cognizant Tech Branches are highly interactive and interdependent. Your attendance **is required** if you: (1) need support from another branch; OR (2) need to supply support to another branch; OR (3) need to document that relationship on our S drive record; AND (4) can't work out the support details with your counterpart from the other supporting/supported Tech Branch outside of the meeting.

If you decline a meeting, please include a contact phone number in case we have to call, except if it is inappropriate to try to reach you (you are ill, on leave, at a medical appointment, engaged in work that can't be disturbed, etc).

Finding a commonly convenient meeting time was a challenge because of the number of invitees. To minimize the need to attend, resolve conflicts by working out the support details with your counterpart from the other supporting/supported Tech Branch outside of the meeting.

We will use the two Excel spreadsheets on the S drive folder to monitor the status of Tech Branch support and the status of RAI traffic. Contact me if something is, or appears to be, not correct.

I will put a shell amendment letter in the S drive folder into which we will put first draft, and then final, text. Immature text will be easy to notice. Any colored font or background is a draft. Contact the author if you need to trust certain content. When sufficient content is finalized (black font and no highlight), paste it into your respective SE Memoranda to match it.

These meetings will get less frequent as we successfully build the amendment letter and supporting Tech Branch SE Memoranda. Turn off automated numbering to avoid interfering with each other. Use headings, titles and subtitles that are comfortable for your Branches. We will tune up the aesthetics at the end as long as accuracy and clarity are preserved for all our needs.

Updates will follow. Please distribute useful information to each other or through me.

Karl  
415-3079 routes to my cell phone

**Hearing Identifier:** NRR\_PMDA  
**Email Number:** 409

**Mail Envelope Properties** (26E42474DB238C408C94990815A02F0996A2B3C316)

**Subject:** Record of ME7110 - Kewaunee - "Chi-Over-Q" - progress review [dated Wed 7/11/2012 3:00 PM - 4:00 PM from Outlook invitation]  
**Sent Date:** 7/11/2012 1:03:50 PM  
**Received Date:** 7/11/2012 1:03:52 PM  
**From:** Feintuch, Karl

**Created By:** Karl.Feintuch@nrc.gov

**Recipients:**  
"Feintuch, Karl" <Karl.Feintuch@nrc.gov>  
Tracking Status: None

**Post Office:** HQCLSTR01.nrc.gov

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	11660	7/11/2012 1:03:52 PM
ME7110- Kewaunee LAR 244: Executive Summary of LRA Emergent Issue - further information - generic implications for other plants		45786

**Options**  
**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**