

From: [Wilkins, Lynnea](#)
To: [McCutchen, Edward L.](#)
Cc: [Victor, William R. - Strategic Initiatives](#)
Subject: ME7169 - Request for Additional Information RE: CNS 24 Month Fuel Cycle LAR - TS 5.5.2
Date: Thursday, September 06, 2012 4:21:00 PM
Attachments: [image001.png](#)

Ed,

The NRC staff has a question regarding the statement, "The surveillance history review did not find any cases where the required integrated leak tests were not performed within the 18-month interval (including the 25% grace period)." It is the staff's understanding that the history review is intended to identify if there were any failures of the SR over the last 5 cycles or that would not have been otherwise detected by SR or routine plant activities (not if the tests have been faithfully performed per schedule, as stated). Please clarify the results of past SR performances, not just that they had been performed within required periodicity. Additionally, please clarify if your conclusion that the impact of the frequency change on safety is small based in large part on the fact that more frequent walkdowns of the system and contamination survey efforts should pick up on any developing leakage.

TS 5.5.2. Systems Integrity Monitoring Program

The program shall include the following:

- b. Integrated leak test requirements for each system at 18 month intervals or less.

The test interval of this TS is being increased from once every 18 months to once every 24 months for a maximum interval of 30 months, including the 25% grace period afforded by TS SR 3.0.2.

This requirement establishes a program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. Specifically, the program requires an "Integrated leak test requirement for each system at 18 month intervals or less." The surveillance history review did not find any cases where the required integrated leak tests were not performed within the 18-month interval (including the 25% grace period). The change to 24-month operating cycles will increase the testing interval. This change to the testing requirement has been evaluated and determined that the impact, if any, on safety is small. This conclusion is based on the fact that most portions of the subject systems included in this program are visually walked down, while the plant is operating, during plant testing and/or operator/system engineer walkdowns. In addition, housekeeping/safety walkdowns also serve to detect any gross leakage. If leakage is observed from these systems, corrective actions will be taken to repair the leakage. Finally, the plant radiological surveys will also identify any potential sources of leakage. Based on more frequent inspections previously described, and the ability to readily detect system leakage performance deficiencies, the impact of this change on safety, if any, is small.

Please contact me if a clarifying call is needed.

Thanks
Lynnea

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