



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
WASHINGTON, D.C. 20555-0001

November 26, 2013

Vice President, Operations  
Entergy Nuclear Operations, Inc.  
Palisades Nuclear Plant  
27780 Blue Star Memorial Highway  
Covert, MI 49043-9530

**SUBJECT: PALISADES - INTERIM STAFF EVALUATION AND REQUEST FOR  
ADDITIONAL INFORMATION REGARDING THE OVERALL INTEGRATED  
PLAN FOR IMPLEMENTATION OF ORDER EA-12-051, RELIABLE SPENT  
FUEL POOL INSTRUMENTATION (TAC NO. MF0769)**

Dear Sir:

On March 12, 2012, the U.S. Nuclear Regulatory Commission (NRC) issued Order EA-12-051, "Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation" (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12054A679), to all power reactor licensees and holders of construction permits in active or deferred status. This order requires the licensee to have a reliable indication of the water level in associated spent fuel storage pools capable of supporting identification of the following pool water level conditions by trained personnel: (1) level that is adequate to support operation of the normal fuel pool cooling system, (2) level that is adequate to provide substantial radiation shielding for a person standing on the spent fuel pool operating deck, and (3) level where fuel remains covered and actions to implement make-up water addition should no longer be deferred.

By letter dated February 28, 2013 (ADAMS Accession No. ML13060A360), Entergy Nuclear Operations, Inc. (the licensee) provided the Overall Integrated Plan (OIP) for Palisades describing how it will achieve compliance with Attachment 2 of Order EA-12-051 by the spring of 2015. By e-mail dated July 18, 2013 (ADAMS Accession No. ML13200A328), the NRC staff sent a request for additional information (RAI) to the licensee. The licensee provided supplemental information by letters dated August 19, 2013 (ADAMS Accession No. ML13231A126), and August 28, 2013 (ADAMS Accession No. ML13241A235).

The NRC staff has reviewed these submittals with the understanding that the licensee will update its OIP as implementation of the Order progresses. With this in mind, the staff has included an interim staff evaluation with this letter to provide feedback on the OIP. The staff's findings in the interim staff evaluation are considered preliminary and will be revised as the OIP is updated. As such, none of the staff's conclusions are to be considered final. A final NRC staff evaluation will be issued after the licensee has provided the information requested.

The interim staff evaluation also includes RAIs, response to which the NRC staff needs to complete its review. The licensee should provide the information requested in the 6-month

status updates, as the information becomes available. However, the staff requests that all information be provided by March 31, 2015, to ensure that any issues are resolved prior to the date by which the licensee must complete full implementation of Order EA-12-051. The licensee should adjust its schedule for providing information to ensure that all this information is provided by the requested date.

If you have any questions regarding this letter, please contact me at 301-415-8371 or via e-mail at [Mahesh.Chawla@nrc.gov](mailto:Mahesh.Chawla@nrc.gov).

Sincerely,



Mahesh Chawla, Project Manager  
Plant Licensing Branch III-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-255

Enclosure:  
Interim Staff Evaluation and  
Request for Additional Information

cc w/encl: Distribution via Listserv

**INTERIM STAFF EVALUATION AND REQUEST FOR ADDITIONAL INFORMATION**  
**BY THE OFFICE OF NUCLEAR REACTOR REGULATION**  
**RELATED TO THE OVERALL INTEGRATED PLAN IN RESPONSE TO**  
**ORDER EA-12-051, RELIABLE SPENT FUEL POOL INSTRUMENTATION**  
**ENTERGY NUCLEAR OPERATIONS, INC.**  
**PALISADES NUCLEAR PLANT**  
**DOCKET NO. 50-255**

**1.0 INTRODUCTION**

On March 12, 2012, the U.S. Nuclear Regulatory Commission (NRC) issued Order EA-12-051, "Issuance of Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation" (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12054A679), to all power reactor licensees and holders of construction permits in active or deferred status. This order requires, in part, that all operating reactor sites have a reliable means of remotely monitoring wide-range spent fuel pool (SFP) levels to support effective prioritization of event mitigation and recovery actions in the event of a beyond-design-basis (BDB) external event. The order required all holders of operating licenses issued under Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, "Domestic Licensing of Production and Utilization Facilities," to submit to the NRC an Overall Integrated Plan (OIP) by February 28, 2013.

By letter dated February 28, 2013 (ADAMS Accession No. ML13060A360), Entergy Nuclear Operations, Inc. (ENO) (the licensee) provided the OIP for Palisades Nuclear Plant describing how it will achieve compliance with Attachment 2 of Order EA-12-51 by the spring of 2015. By e-mail dated July 18, 2013 (ADAMS Accession No. ML13200A328), the NRC staff sent a request for additional information (RAI) to the licensee. The licensee provided supplemental information by the letters dated August 19, 2013 (ADAMS Accession No. ML13231A126), and August 28, 2013 (ADAMS Accession No. ML13241A235).

**2.0 REGULATORY EVALUATION**

Order EA-12-051 requires all holders of operating licenses issued under 10 CFR Part 50, notwithstanding the provisions of any Commission regulation or license to the contrary, to comply with the requirements described in Attachment 2 to this Order except to the extent that a more stringent requirement is set forth in the license. Licensees shall promptly start implementation of the requirements in Attachment 2 to the order and shall complete full implementation no later than two refueling cycles after submittal of the OIP or December 31, 2016, whichever comes first.

Order EA-12-051 required the licensees, by February 28, 2013, to submit to the Commission an OIP, including a description of how compliance with the requirements described in Attachment 2 of the Order will be achieved.

Enclosure

Attachment 2 of Order EA-12-051 requires the licensees to have a reliable indication of the water level in associated spent fuel storage pools capable of supporting identification of the following pool water level conditions by trained personnel: (1) level that is adequate to support operation of the normal fuel pool cooling system, (2) level that is adequate to provide substantial radiation shielding for a person standing on the SFP operating deck, and (3) level where fuel remains covered and actions to implement make-up water addition should no longer be deferred.

Attachment 2 of Order EA-12-051, states that the SFP level instrumentation shall include the following design features:

- 1.1 **Instruments:** The instrumentation shall consist of a permanent, fixed primary instrument channel and a backup instrument channel. The backup instrument channel may be fixed or portable. Portable instruments shall have capabilities that enhance the ability of trained personnel to monitor spent fuel pool water level under conditions that restrict direct personnel access to the pool, such as partial structural damage, high radiation levels, or heat and humidity from a boiling pool.
- 1.2 **Arrangement:** The spent fuel pool level instrument channels shall be arranged in a manner that provides reasonable protection of the level indication function against missiles that may result from damage to the structure over the spent fuel pool. This protection may be provided by locating the primary instrument channel and fixed portions of the backup instrument channel, if applicable, to maintain instrument channel separation within the spent fuel pool area, and to utilize inherent shielding from missiles provided by existing recesses and corners in the spent fuel pool structure.
- 1.3 **Mounting:** Installed instrument channel equipment within the spent fuel pool shall be mounted to retain its design configuration during and following the maximum seismic ground motion considered in the design of the spent fuel pool structure.
- 1.4 **Qualification:** The primary and backup instrument channels shall be reliable at temperature, humidity, and radiation levels consistent with the spent fuel pool water at saturation conditions for an extended period. This reliability shall be established through use of an augmented quality assurance process (e.g., a process similar to that applied to the site fire protection program).
- 1.5 **Independence:** The primary instrument channel shall be independent of the backup instrument channel.
- 1.6 **Power supplies:** Permanently installed instrumentation channels shall each be powered by a separate power supply. Permanently installed and portable instrumentation channels shall provide for power connections from sources independent of the plant [alternating current (ac)] and [direct

current (dc)] power distribution systems, such as portable generators or replaceable batteries. Onsite generators used as an alternate power source and replaceable batteries used for instrument channel power shall have sufficient capacity to maintain the level indication function until offsite resource availability is reasonably assured.

- 1.7 Accuracy: The instrument channels shall maintain their designed accuracy following a power interruption or change in power source without recalibration.
- 1.8 Testing: The instrument channel design shall provide for routine testing and calibration.
- 1.9 Display: Trained personnel shall be able to monitor the spent fuel pool water level from the control room, alternate shutdown panel, or other appropriate and accessible location. The display shall provide on-demand or continuous indication of spent fuel pool water level.

Attachment 2 of Order EA-12-051, states that the SFP instrumentation shall be maintained available and reliable through appropriate development and implementation of the following programs:

- 2.1 Training: Personnel shall be trained in the use and the provision of alternate power to the primary and backup instrument channels.
- 2.2 Procedures: Procedures shall be established and maintained for the testing, calibration, and use of the primary and backup spent fuel pool instrument channels.
- 2.3 Testing and Calibration: Processes shall be established and maintained for scheduling and implementing necessary testing and calibration of the primary and backup spent fuel pool level instrument channels to maintain the instrument channels at the design accuracy.

On August 29, 2012, the NRC issued an Interim Staff Guidance document (the ISG), JLD-ISG-2012-03, "Compliance with Order EA-12-051, Reliable Spent Fuel Pool Instrumentation" (ADAMS Accession No. ML12221A339), to describe methods acceptable to the NRC staff for complying with Order EA-12-051. The ISG endorses, with exceptions and clarifications, the methods described in the Nuclear Energy Institute (NEI) guidance document NEI 12-02, Revision 1, "Industry Guidance for Compliance with NRC Order EA-12-051, to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," dated August 2012 (ADAMS Accession No. ML12240A307). Specifically, the ISG states:

The NRC staff considers that the methodologies and guidance in conformance with the guidelines provided in NEI 12-02, Revision 1, subject to the clarifications and exceptions in Attachment 1 to this ISG, are an acceptable means of meeting the requirements of Order EA-12-051.

### 3.0 TECHNICAL EVALUATION

#### 3.1 Background and Schedule

Palisades Nuclear Plant is a single unit PWR with a single associated SFP. The SFP is 14 feet (ft.) 8 inches (in.) long and 38 ft. 9 in. wide.

The licensee submitted its OIP on February 28, 2013. The OIP states that installation of the SFP level instrumentation at Palisades Nuclear Plant will be completed prior to startup from the spring 2015 refueling outage. In its letter dated August 28, 2013, the licensee stated that the target completion date for installation of the SFP instrumentation was revised from the spring of 2015 to the fall of 2015 to reflect a change in the 2015 refueling outage schedule.

The NRC staff has reviewed the licensee's schedule for implementation of SFP level instrumentation provided in its OIP. If the licensee completes implementation in accordance with this schedule, it would appear to achieve compliance with Order EA-12-051 within two refueling cycles after submittal of the OIP and before December 31, 2016.

#### 3.2 Spent Fuel Pool Water Levels

Attachment 2 of Order EA-12-051 states, in part, that

All licensees identified in Attachment 1 to this Order shall have a reliable indication of the water level in associated spent fuel storage pools capable of supporting identification of the following pool water level conditions by trained personnel: (1) level that is adequate to support operation of the normal fuel pool cooling system [Level 1], (2) level that is adequate to provide substantial radiation shielding for a person standing on the SFP operating deck [Level 2], and (3) level where fuel remains covered and actions to implement make-up water addition should no longer be deferred [Level 3].

NEI 12-02 states, in part, that

Level 1 represents the HIGHER of the following two points:

- The level at which reliable suction loss occurs due to uncovering of the coolant inlet pipe, weir or vacuum breaker (depending on the design), or
- The level at which the water height, assuming saturated conditions, above the centerline of the cooling pump suction provides the required net positive suction head specified by the pump manufacturer or engineering analysis.

In its OIP, the licensee stated, in part, that

(1) the level at which reliable suction loss occurs due to uncovering the coolant inlet pipe or any weirs or vacuum breakers associated with suction loss. For Palisades, the elevation associated with this level is 645 feet 7 inches (Reference 6, see G-6) due to uncovering of the skimmer opening.

(2) the level at which the normal fuel pool cooling pumps lose required NPSH assuming saturated conditions in the pool. An evaluation will be completed to demonstrate that this elevation is below the elevation that defines Level 1.

The higher of the above points is (1). Therefore, LEVEL 1 is elevation 645 feet 7 inches.

In its letter dated August 19, 2013, the licensee stated, in part, that

The water level above the pump necessary to maintain the required net positive suction head (NPSH) for saturated conditions is approximately 605'. This level is well below 645'-7", which is the level at which the cooling pump suction pipe begins to uncover. Therefore, the Level 1 elevation is 645'-7".

The NRC staff notes that the elevation identified as Level 1 is adequate for normal SFP cooling system operation and it is also adequate to ensure the required fuel pool cooling pump Net Positive Suction Head (NPSH). This level represents the higher of the two points described in NEI 12-02 for Level 1.

NEI 12-02 states, in part, that

Level 2 represents the range of water level where any necessary operations in the vicinity of the spent fuel pool can be completed without significant dose consequences from direct gamma radiation from the stored spent fuel. Level 2 is based on either of the following:

- 10 feet (+/- 1 foot) above the highest point of any fuel rack seated in the spent fuel pools, or
- a designated level that provides adequate radiation shielding to maintain personnel radiological dose levels within acceptable limits while performing local operations in the vicinity of the pool. This level shall be based on either plant-specific or appropriate generic shielding calculations, considering the emergency conditions that may apply at the time and the scope of necessary local operations, including installation of portable SFP instrument channel components.

In its OIP, the licensee stated, in part, that

(1) 10 feet  $\pm$  1 foot above the highest point of any fuel rack seated in the spent fuel pool. The elevation associated with this level is 634 feet 5 inches  $\pm$  1 foot (i.e., Level 3 + 10 feet).

(2) A designated level that provides adequate radiation shielding to maintain personnel dose within acceptable limits while performing local operations in the vicinity of the pool. This level is based on plant-specific or appropriate generic shielding calculations. The elevation associated with this level is not calculated since item (1) is used to establish Level 2 as permitted by NEI 12-02 Revision 1.

Therefore, LEVEL 2 is elevation 634 feet 5 inches (10 feet above Level 3). ...

In its letter dated August 19, 2013, the licensee provided a sketch depicting the elevations identified as Levels 1, 2 and 3 and the SFP level instrumentation sensor range. The NRC staff reviewed this sketch and notes that Level 2 is identified at an elevation of 634 ft. 5 in., which is more than 10 ft. above the top of the fuel racks.

In its OIP, the licensee stated that other hardware stored in the SFP will be evaluated to ensure that it does not adversely interact with the SFP instrument probes during a seismic event. In NRC email dated July 18, 2013, the staff requested information regarding the dose impact from other irradiated material stored in the SFP in the identification of the elevation for Level 2.

In its letter dated August 19, 2013, the licensee stated that the response to this question is currently scheduled to be included in the second six-month report to the staff, due on February 28, 2014. The staff has identified this request as:

**RAI #1**

**Given the potential for varied dose rates from other materials stored in the SFP, please describe how level 2 will be adjusted to other than the elevation provided in section 2 above.**

*(This information was previously requested as RAI-I.C. in NRC email dated July 18, 2013)*

NEI 12-02 states, in part, that

Level 3 corresponds nominally (i.e., +/- 1 foot) to the highest point of any fuel rack seated in the spent fuel pool. Level 3 is defined in this manner to provide the maximum range of information to operators, decision makers and emergency response personnel.

In its OIP, the licensee stated that Level 3 is at elevation 624 ft. 5 in., which is the highest point of any fuel rack seated in the spent fuel pool.

In its letter dated August 19, 2013, the licensee provided a sketch depicting the elevations identified as Levels 1, 2 and 3 and the SFP level instrumentation sensor range. The NRC staff reviewed this sketch and notes that Level 3 is identified at an elevation of 625 ft. 5 in. which is 1 foot above the highest point of any spent fuel storage rack seated in the SFP. With an uncertainty in level sensor reading of approximately  $\pm 3$  inches, an indicated reading at that value should demonstrate that there will be approximately 9 inches of water remaining above the top of the highest point of any fuel rack.

The licensee's proposed plan, with respect to identification of Levels 1 and 3, appears to be consistent with NEI 12-02, as endorsed by the ISG.



### 3.3 Design Features: Instruments

Attachment 2 of Order EA-12-051, states, in part, that

The instrumentation shall consist of a permanent, fixed primary instrument channel and a backup instrument channel. The backup instrument channel may be fixed or portable. Portable instruments shall have capabilities that enhance the ability of trained personnel to monitor spent fuel pool water level under conditions that restrict direct personnel access to the pool, such as partial structural damage, high radiation levels, or heat and humidity from a boiling pool.

NEI 12-02 states, in part, that

A spent fuel pool level instrument channel is considered reliable when the instrument channel satisfies the design elements listed in Section 3 [Instrumentation Design Features] of this guidance and the plant operator has fully implemented the programmatic features listed in Section 4 [Program Features].

In its OIP, the licensee stated that both the primary and backup instrument level channels would be permanent, mounted directly within the SFP and that each instrument channel would be capable of monitoring SFP water level over a single continuous span from above Level 1 to within 1 foot of the top of the spent fuel racks.

In its letter dated August 19, 2013, the licensee stated, in part, that

The spent fuel pool (SFP) level lower instrument span or probe bottom extends down to at least three inches below the upper limit of the range of Level 3 to account for channel accuracy or instrument loop uncertainty. Therefore, the SFP level probe bottom/span extends down to at least elevation 625'-2" (see Figure 1). The SFP level upper instrument span, at a minimum, includes the high level alarm. Note that Level 3 is shown in accordance with Nuclear Energy Institute (NEI) 12-02, "Industry Guidance for Compliance with NRC Order EA-12-051, To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," Revision 1, guidance relative to the top of the rack; the top of the fuel is not shown.

In its letter dated August 19, 2013, the licensee provided a sketch depicting the elevations identified as Levels 1, 2 and 3 and the SFP level instrumentation measurement range. The NRC staff reviewed this sketch and notes that, consistent with the information provided, the measurement range goes from the 647 ft. 10 in. to 625 ft. 2 in.

The NRC staff notes that the range specified for the licensee's instrumentation will cover Levels 1, 2, and 3 as described in Section 3.2 above. The licensee's proposed plan, with respect to the number of channels and the range of the SFP level instrumentation appears to be consistent with NEI 12-02, as endorsed by the ISG.

### 3.4 Design Features: Arrangement

Attachment 2 of Order EA-12-051, states, in part, that

The spent fuel pool level instrument channels shall be arranged in a manner that provides reasonable protection of the level indication function against missiles that may result from damage to the structure over the spent fuel pool. This protection may be provided by locating the primary instrument channel and the fixed portions of the backup instrument channel, if applicable, to maintain instrument channel separation within the spent fuel pool area, and to utilize inherent shielding from missiles provided by existing recesses and corners in the spent fuel pool structure.

NEI 12-02 states, in part, that

The intent of the arrangement requirement is to specify reasonable separation and missile protection requirements for permanently installed instrumentation used to meet this order. Although additional missile barriers are not required to be installed, separation and shielding can help minimize the probability that damage due to an explosion or extreme natural phenomena (e.g., falling or wind-driven missiles) will render fixed channels of SFP instrumentation unavailable. Installation of the SFP instrument channels shall be consistent with the plant-specific SFP design requirements and should not impair normal SFP function.

Channel separation should be maintained by locating the installed sensors in different places in the SFP area.

In its OIP, the licensee stated, in part that

Level instruments will be installed in the approximate locations shown on Attachment 1. Separation of the channels/probes reduces the potential for falling debris or missiles affecting both channels of instrumentation. This placement coupled with separate routing paths for cables and use of rigid conduit provides reasonable protection against falling debris and structural damage.

In the SFP area, cables shall be routed in seismically mounted rigid metal conduit. Outside the pool area, cables shall be routed in seismically mounted rigid metal conduit, trays, or raceways...

In its OIP, the licensee provided a sketch showing the SFP instrument locations and approximate cable routing. In its letter dated August 19, 2013, the licensee provided an additional sketch depicting the inside dimensions of the SFP as well as the planned placement of the primary and backup level sensors in the SFP. The NRC staff reviewed these sketches and notes that the SFP level instrument probes are located on the north and south walls of the SFP and that from that point the cables are routed separately to the display locations.

The licensee's proposed arrangement for the primary and backup SFP level instrumentation appears to be consistent with NEI 12-02, as endorsed by the ISG.

### 3.5 Design Features: Mounting

Attachment 2 of Order EA-12-051 states, in part, that

Installed instrument channel equipment within the spent fuel pool shall be mounted to retain its design configuration during and following the maximum seismic ground motion considered in the design of the spent fuel pool structure.

NEI 12-02 states, in part, that

The mounting shall be designed to be consistent with the highest seismic or safety classification of the SFP. An evaluation of other hardware stored in the SFP shall be conducted to ensure it will not create adverse interaction with the fixed instrument location(s).

The basis for the seismic design for mountings in the SFP shall be the plant seismic design basis at the time of submittal of the Integrated Plan for implementing NRC Order EA-12-051.

In its OIP, the licensee stated that both the primary and backup system will be installed as seismic category I to meet the NRC JLD-ISG-2012-03 and NEI 12-02 guidance requirements. The licensee also stated that other hardware stored in the SFP will be evaluated to ensure that it does not adversely interact with the SFP instrument probes during a seismic event.

In its August 19, 2013, letter, the licensee stated, in part, that

The loading on the probe mount and probe body includes both seismic and hydrodynamic loading using seismic response spectra that bound the PNP design basis maximum seismic loads applicable to the installation location(s). The static weight load is also accounted for in the modeling described below but is insignificant in comparison to seismic and hydrodynamic loads. Analytic modeling is being performed by the instrument vendor using Institute of Electrical and Electronic Engineers IEEE 344-2004, "IEEE Recommended Practice for Seismic Qualification of Class 1 E Equipment for Nuclear Power Generating Stations," methodology.

The simple unibody structure of the probe assembly makes it a candidate for analytic modeling and the dimensions of the probe and complex hydrodynamic loading terms in any case preclude meaningful physical testing.

A detailed computational SFP hydrodynamic model has been developed for the instrument vendor by Numerical Applications, Inc., author of the GOTHIC computational fluid dynamics code. The computational model accounts for multi-dimensional fluid motion, pool sloshing, and loss of water from the pool.

Seismic loading response of the probe and mount is separately modeled using finite element modeling software. The GOTHIC-derived fluid motion profile in the pool at the installation site and resultant distributed hydrodynamic loading terms are added to the calculated seismic loading terms in the finite element model to

provide a conservative estimate of the combined seismic and hydrodynamic loading terms for the probe and probe mount, specific to the chosen installation location for the probe.

The proximal portion of the level probe is designed to be attached near its upper end (refer to Figure 3) to a Seismic Category I mounting bracket configured to suit the requirements of a particular SEP. The bracket may be bolted and/or welded to the SFP deck and/or SFP liner/wall according to the requirements of the particular installation per Seismic Category I requirements.

The NRC staff notes that the proposed application of such seismic design criteria appears to be reasonable and addresses the staff-endorsed NEI 12-02 guidance stating that the channel is to be designed consistent with the highest seismic or safety classification of the SFP. The licensee's proposed plan, with respect to the seismic design of the mounting, appears to be consistent with NEI 12-02, as endorsed by the ISG. The staff plans to verify the results of the licensee's seismic testing and analysis report when it is completed based on the licensee's response to the following RAIs.

**RAI #2**

**Please provide the analyses verifying the seismic capability of the level probes, the mounting brackets, and the electronics units, and provide the results of the analysis of the combined maximum seismic and hydrodynamic forces on the cantilevered portion of the assembly exposed to the potential sloshing effects. Show that the SFP instrument design configuration will be maintained during and following the maximum seismic ground motion considered in the design of the SFP structure.**

**RAI #3**

**For each of the mounting attachments required to attach SFP Level equipment to plant structures, please describe the design inputs, and the methodology that will be used to qualify the structural integrity of the affected structures/equipment.**

While addressing the potential for adverse interactions of the SFP level instruments with other hardware stored in the SFP the licensee stated within its letter dated August 19, 2013, in part, that

An evaluation of non-special nuclear material inventory located in the SFP will be performed during the spent fuel pool instrumentation (SFPI) modification process. Non-special nuclear material access to the SFP is governed by EN-RE-220, "PWR Control of Miscellaneous Material in the Spent Fuel Pool." This procedure will be used to prevent any instrument interference from non-special nuclear materials.

The NRC staff notes that an evaluation to address the potential for interaction between non-nuclear material inventory located in the SFP and the SFP level instruments will be performed during the SFP instrumentation modification process. The staff has identified this request as:

#### RAI #4

**Please address how other hardware stored in the SFP will not create adverse interaction with the fixed instrument location(s).**

*(This information was previously requested as RAI-3.d in NRC letter dated July 18, 2013)*

#### 3.6 Design Features: Qualification

Attachment 2 of Order EA-12-051 states, in part, that

The primary and backup instrument channels shall be reliable at temperature, humidity, and radiation levels consistent with the spent fuel pool water at saturation conditions for an extended period. This reliability shall be established through use of an augmented quality assurance process (e.g. a process similar to that applied to the site fire protection program).

NEI 12-02 states, in part, that

The instrument channel reliability shall be demonstrated via an appropriate combination of design, analyses, operating experience, and/or testing of channel components for the following sets of parameters, as described in the paragraphs below:

- conditions in the area of instrument channel component use for all instrument components,
- effects of shock and vibration on instrument channel components used during any applicable event for only installed components, and
- seismic effects on instrument channel components used during and following a potential seismic event for only installed components...

The NRC staff assessment of the instrument qualification is discussed in the following subsections below: (3.6.1) Augmented Quality Process, (3.6.2) Post Event Conditions, (3.6.3) Shock and Vibration, and (3.6.4) Seismic Reliability.

##### *3.6.1 Augmented Quality Process*

Appendix A-1 of the guidance in NEI 12-02 describes a quality assurance process for non-safety systems and equipment that is not already covered by existing quality assurance requirements. Within the ISG, the NRC staff found the use of this quality assurance process to be an acceptable means of meeting the augmented quality requirements of Order EA-12-051.

In its OIP, the licensee stated, in part, that

Augmented quality requirements will be applied to all components in the instrumentation channels for:

- design control
- procurement document control
- instructions, procedures, and drawings
- control of purchased material, equipment, and services
- inspection, testing, and test control
- inspections, test, and operating status
- nonconforming items
- corrective actions
- records
- audits

The licensee's proposed augmented quality assurance process appears to be consistent with NEI 12-02, as endorsed by the ISG.

### *3.6.2 Post Event Conditions*

NEI 12-02 states, in part, that

The temperature, humidity and radiation levels consistent with conditions in the vicinity of the [SFP] and the area of use considering normal operational, event and post-event conditions for no fewer than seven days post-event or until off-site resources can be deployed by the mitigating strategies resulting from Order EA-12-049 should be considered. Examples of post-event (beyond-design-basis) conditions to be considered are:

- radiological conditions for a normal refueling quantity of freshly discharged (100 hours) fuel with the SFP water level 3 as described in this order,
- temperatures of 212 degrees F and 100% relative humidity environment,
- boiling water and/or steam environment
- a concentrated borated water environment, and...

In its OIP, the licensee stated, consistent with NEI 12-02, in part, that

Components in the area of the SFP will be designed for the temperature, humidity, and radiation levels expected during normal, event, and post-event conditions for no fewer than seven days post-event or until off-site resources can be deployed by the mitigating strategies resulting from Order EA-12-049, Order Modifying Licenses With Regard to Requirements for Mitigation for Beyond-Design-Basis External Events. Examples of post event conditions that will be considered are:

- Radiological conditions for a normal refueling quantity of freshly discharged (100 hours) fuel with SFP water level within 1 foot of the top of the SFP racks (Level 3),

- Temperature of 212 degrees F and 100% relative humidity environment,
- Boiling water and steam environment
- Concentrated borated water environment, and...

Related to radiological conditions, in its OIP the licensee stated, in part, that

Equipment located in the SFP will be qualified to withstand a total accumulated dose of expected lifetime at normal conditions plus accident dose received at post event conditions with SFP water level within 1 foot of the top of the fuel rack seated in the spent fuel pool (Level 3).

The metal probe and cable in the spent fuel pool area are robust components that are not adversely affected by expected radiation, temperature, or humidity. The areas selected for display/processor installation are considered mild environments, such that personnel access is not prohibited by radiation, temperature, or humidity, and are readily accessible by operators during or after a BDBE event.

In its letter dated August 19, 2013, the licensee stated, in part, that

Radiation:

Signal processor: The signal processor is installed in a mild environment with radiation levels similar to background radiation, with the acknowledgement that the radiation limit for the signal processor is similar to other commercial-grade complementary—metal oxide--semiconductor (CMOS)-based electronics. Radiation testing is not planned. It should be noted that the instrument performs self-diagnostics before measurements are obtained and the electronics are easily accessible for periodic replacement.

Probe assembly: Materials properties qualification is used.

**RAI #5**

**Please provide analysis of the maximum expected radiological conditions (dose rate and total integrated dose) to which the sensor electronics will be exposed. Also, please provide documentation indicating the radiological dosage the electronics for this equipment are capable of withstanding. Please discuss the time period over which the analyzed total integrated dose is evaluated to be applied.**

While addressing post-event temperature and humidity conditions, in its letter dated August 19, 2013, the licensee stated, in part, that

Temperature:

Signal processor: Designed for mild environment installation. Physical testing in an environmental chamber to demonstrate normal operation at the operating temperatures specified for the instrument.

Probe assembly: Qualification by materials properties and use history of substantially similar probe designs in steam generator applications at significantly higher temperatures and pressures and saturated steam environments.

Humidity:

Signal processor: Designed for mild environment installation. Physical testing in an environmental chamber to demonstrate normal operation at the operating humidity specified for the instrument.

Probe assembly: Qualification by materials properties and use history as noted above.

The NRC staff notes that information related to the qualification and test program to confirm the reliability of the permanently installed equipment during and following BDB events are not available for review. The staff has identified these requests as:

**RAI #6**

**Please provide information indicating the maximum expected ambient temperature in the room in which the sensor electronics will be located under BDB conditions with no ac power available to run Heating Ventilation and Air Conditioning (HVAC) systems, and whether the sensor electronics are capable of continuously performing required functions under this expected temperature condition.**

**RAI #7**

**Please provide information indicating the maximum expected relative humidity in the room in which the sensor electronics will be located under BDB conditions, with no ac power available to run HVAC systems, and whether the sensor electronics are capable of continuously performing required functions under this expected humidity condition.**

*3.6.3 Shock and Vibration*

NEI 12-02 states, in part, that

Applicable components of the instrument channels are rated by the manufacturer (or otherwise tested) for shock and vibration at levels commensurate with those of postulated design basis event conditions in the area of instrument channel component use using one or more of the following methods:



- instrument channel components use known operating principles, are supplied by manufacturers with commercial quality programs (such as ISO9001) with shock and vibration requirements included in the purchase specification and/or instrument design, and commercial design and testing for operation in environments where significant shock and vibration loadings are common, such as for portable hand-held devices or transportation applications;
- substantial history of operational reliability in environments with significant shock and vibration loading, such as transportation applications, or
- use of component inherently resistant to shock and vibration loadings or are seismically reliable such as cables.

In its OIP, the licensee stated that components of the instrument channels would be qualified for shock and vibration using the methods identified in NEI 12-02.

In its letter dated August 19, 2013, the licensee stated, in part, that

Shock:

Signal processor: Physical testing to commercial and/or military standards using shake-table and drop testing.

Probe assembly: Finite element analysis in conjunction with seismic modeling described above.

Vibration:

Signal processor: Physical testing to applicable commercial and/or military standards using shake-table and drop testing.

Probe assembly: The probe assembly and bracket together form a simple static unibody structure with intrinsic vibration resistance that is additionally subject to substantial damping due to the surrounding water medium. This is planned to be modeled using finite element modeling in conjunction with seismic modeling described above.

The NRC staff has concerns with the licensee's lack of information regarding qualification of the SFP level instruments for shock and vibration. The staff has identified these requests as:

**RAI #8**

**Please provide a description of the specific method or combination of methods that will be used to demonstrate the reliability of the permanently installed equipment under BDB shock and vibration conditions. Identify the specific commercial and/or military standards that will be used to establish the testing requirements, and the specific acceleration levels and frequencies that will be simulated.**

**RAI #9**

**For RAI #8 above, please provide the results for the selected methods, tests and analyses used to demonstrate the qualification and reliability of the installed equipment in accordance with the Order requirements.**

*3.6.4 Seismic Reliability*

The ISG recommends the use of Sections 7, 8, 9, and 10 of IEEE 344-2004 for seismic qualification of the SFP level instrumentation.

In its OIP, the licensee stated, in part, that

For seismic effects on instrument channel components used after a potential seismic event for only installed components (with the exception of replaceable batteries and chargers), the following measures will be used to verify that the design and installation is adequate:

- Components will be rated by the manufacturer (or otherwise tested) for seismic effects at levels commensurate with those of postulated design basis event conditions in the area of instrument channel component...
- Augmented quality requirements will be applied to all components in the instrument channels...

In its letter dated August 19, 2013, the licensee stated, in part, that

Signal processor (electronics): Triaxial shake-table testing is planned to be performed by the vendor to envelope Seismic Category I safe shutdown earthquake (SSE) conditions or PNP design basis maximum seismic loads (relative to the location where the equipment is mounted) using IEEE 344-2004 methodology.

Probe assembly (level sensor): Seismic and hydrodynamic finite element analysis is performed by the vendor using relevant IEEE 344-2004 methodology (using enveloping Seismic Category I SSE conditions or PNP design basis maximum seismic loads relative to the location where the equipment is mounted), as described in the RAI-4.a response above.

With respect to the probe assembly, combined seismic and hydrodynamic analysis will be used to demonstrate that the probe waveguide's geometric dimensions do not change significantly as a result of the seismic conditions. In the absence of alteration to the geometric configuration of the probe waveguide there is no mechanism for seismic excitation of the probe assembly to alter system accuracy.

The accuracy of system electronics will be demonstrated following seismic excitation as part of the seismic testing protocol.

The NRC staff notes the licensee will demonstrate the reliability of the seismic design and installation in accordance with NEI 12-02, as endorsed by the ISG. The licensee's planned approach with respect to the seismic reliability of the instrumentation appears to be consistent with NEI 12-02, as endorsed by the ISG. However, the staff plans to verify the results of the licensee's seismic testing and analysis when it is completed. The staff has identified this request as:

#### **RAI #10**

**Please provide an evaluation of the vendor analysis and seismic testing results and show that the instrument performance reliability, following exposure to simulated seismic conditions representative of the environment anticipated for the SFP structures at Palisades, has been adequately demonstrated.**

#### *3.6.5 Qualification Evaluation Summary*

Upon acceptable resolution of the RAIs in Section 3.6, the NRC staff will be able to make a conclusion regarding the instrument qualification.

#### 3.7 Design Features: Independence

Attachment 2 of Order EA-12-051 states, in part, that

The primary instrument channel shall be independent of the backup instrument channel.

NEI 12-02 states, in part, that

Independence of permanently installed instrumentation, and primary and backup channels, is obtained by physical and power separation commensurate with the hazard and electrical isolation needs. If plant AC or DC power sources are used then the power sources shall be from different buses and preferably different divisions/channels depending on available sources of power.

In its OIP, the licensee stated that the primary instrument channel would be independent of the backup instrument channel. The licensee stated that independence would be obtained by physical separation of components between channels and the use of normal power supplied from separate 480V buses.

In its letter dated August 19, 2013, the licensee stated, in part, that

The primary instrument (Channel A) will be along the north wall at the west end of the SFP and the backup instrument (Channel B) will be along the south wall at the east end. Locating the new instruments across the pool from each other takes advantage of the distance between the probes for missile and debris protection.

The conceptual design provides two level instruments in the SFP with cabling routed to two display/processors, one of which will be mounted in existing panels

in the Control Room, with the other mounted in the Radwaste Control Panel Room Cabinet C104 at the 590' elevation. Power for each channel is provided from independent 120VAC, 60 Hz power sources. Backup power is provided by a battery capable of providing continuous display operation for at least three days. The battery will be provided with the display/processor. The design prevents failure of a single channel from causing the alternate channel to fail.

The design provides two identical non-safety related wide-range level instruments which feed two independent channels of non-safety cable and indicators to provide a highly reliable remote display of SFP water level. Physical separation of the two channels will be accomplished by separately routing cable and conduit as much as practical. The use of raceways (i.e., conduit or covered trays where appropriate for existing hazards) will provide additional protection from damage due to debris during a BDB event.

The NRC staff notes that the licensee's proposed independence and physical and power separation appears to be consistent with NEI 12-02, as endorsed by the ISG. This proposed arrangement would not affect the operation of the independent channel under BDB event conditions, and the electrical functional performance of each level measurement channel would be considered independent of the other channel. However, the NRC staff plans to review the final electrical power supply design information to complete its review. The NRC staff has identified this request as:

**RAI #11**

**Please provide the NRC staff with the final configuration of the power supply source for each channel so the staff may conclude the two channels are independent from a power supply assignment perspective.**

3.8 Design Features: Power Supplies

Attachment 2 of Order EA-12-051, states in part, that

Permanently installed instrumentation channels shall each be powered by a separate power supply. Permanently installed and portable instrumentation channels shall provide for power connections from sources independent of the plant ac and dc power distribution systems, such as portable generators or replaceable batteries. Onsite generators used as an alternate power source and replaceable batteries used for instrument channel power shall have sufficient capacity to maintain the level indication function until offsite resource availability is reasonably assured.

NEI 12-02 states, in part, that

The normal electrical power supply for each channel shall be provided by different sources such that the loss of one of the channels primary power supply will not result in a loss of power supply function to both channels of SFP level instrumentation.

All channels of SFP level instrumentation shall provide the capability of connecting the channel to a source of power (e.g., portable generators or replaceable batteries) independent of the normal plant AC and DC power systems. For fixed channels this alternate capability shall include the ability to isolate the installed channel from its normal power supply or supplies. The portable power sources for the portable and installed channels shall be stored at separate locations, consistent with the reasonable protection requirements associated with NEI 12-06 (Order EA-12-049). The portable generator or replaceable batteries should be accessible and have sufficient capacity to support reliable instrument channel operation until off-site resources can be deployed by the mitigating strategies resulting from Order EA-12-049.

If adequate power supply for either an installed or portable level instrument credits intermittent operation, then the provisions shall be made for quickly and reliably taking the channel out of service and restoring it to service. For example, a switch on the power supply to the channel is adequate provided the power can be periodically interrupted without significantly affecting the accuracy and reliability of the instrument reading. Continuous indication of SFP level is acceptable only if the power for such indication is demonstrably adequate for the time duration specified in section 3.1[.]

In its OIP, the licensee stated, in part, that

The power supplies for the instrument channels are shown on Attachment 2 and arranged as follows:

- Each instrument channel is normally powered from 120VAC 60Hz plant power to support continuous monitoring of SFP level. The primary channel receives power from a different 480V bus than the backup channel. Therefore, loss of any one 480V bus does not result in loss of normal 120VAC power for both instrument channels.
- On loss of normal 120VAC power, each channel's UPS automatically transfers to a dedicated backup battery. If normal power is restored, the channel will automatically transfers back to the normal AC power.
- The backup batteries are maintained in a charged state by commercial-grade uninterruptible power supplies. The batteries are sized to be capable of supporting intermittent monitoring for a minimum of 3 days of operation. This provides adequate time to allow the batteries to be replaced or until off-site resources can be deployed by the mitigating strategies resulting from Order EA-12-049 Revision 0.
- An external connection permits powering the system from any portable DC source.
- Instrument accuracy and performance are not affected by restoration of power or restarting the processor.

Additionally, in its OIP, the licensee stated that instrument power is derived from the display/processors, and that the backup batteries and associated UPS are located at the processor, seismically mounted, and qualified for the expected environment.

In its August 19, 2013 letter, the licensee stated, in part, that

Each display/processor will have a battery installed adjacent to the display enclosure which is capable of providing power for at least three days...

The sample rate estimates have been developed by the vendor using conservative instrument power requirements and measured battery capacity with draw-downs during and following exposure of the batteries to their maximum operating temperature for up to seven days. The instrument configuration is planned to be established for an automated sample rate when under battery power consistent with seven days continuous operation. Permanent installed battery capacity for seven days continuous operation is planned consistent with NEI 12-02 duration without reliance on or crediting of potentially more rapid FLEX Program power restoration. Batteries are readily replaceable via spare stock without the need for recalibration to maintain accuracy of the instrument. These measures ensure adequate power capacity and margin.

The NRC staff notes the proposed power supply design and criteria for sizing of the battery appear to be consistent with NEI 12-02, as endorsed by the ISG. However, the staff plans to verify the final configuration of the electrical design and the results of the licensee's calculation for required duty cycle given the final design load of the instrument channel for its installed configuration. The staff has identified this request as:

#### **RAI #12**

**Please provide the results of the calculation depicting the battery backup duty cycle requirements demonstrating battery capacity is sufficient to maintain the level indication function until offsite resource availability is reasonably assured.**

#### 3.9 Design Features: Accuracy

Attachment 2 of Order EA-12-051 states, in part, that

The instrument channels shall maintain their designed accuracy following a power interruption or change in power source without recalibration.

NEI 12-02 states, in part, that

Accuracy should consider operations while under SFP BDB conditions, e.g., saturated water, steam environment, or concentrated borated water. Additionally, instrument accuracy should be sufficient to allow trained personnel to determine when the actual level exceeds the specified lower level of each indicating range (levels 1, 2 and 3) without conflicting or ambiguous indication.

In its OIP, the licensee stated, in part, that

Accuracy and indication features are as follows:

- Accuracy: The absolute system accuracy is better than  $\pm 3$  inches. This accuracy is applicable for normal conditions and the temperature, humidity, chemistry, and radiation levels expected for BDBE event conditions.
- Trending: The display trends and retains data when powered from either normal or backup power.
- Restoration after Loss of Power: The system automatically swaps to available power (backup battery power or external DC source) when normal power is lost. Neither the source of power nor system restoration impact accuracy. Previously collected data is retained.
- Diagnostics: The system performs and displays the results of real-time information related to the integrity of the cable, probe, and instrument channel.

The above features ensure that trained personnel can easily determine when SFP level falls below each regulatory level (levels 1, 2, and 3) without conflicting or ambiguous indication.

In its letter dated August 19, 2013, the licensee stated, in part, that

The instrument channel level accuracy will be specified as  $\pm 3.0$  inches for all expected conditions. The expected instrument channel accuracy performance would be approximately  $\pm 1$  % of span (based on the sensitive range of the detector).

In general relative to normal operating conditions, any applicable calibration procedure tolerances (or acceptance criterion) are planned to be established based on manufacturer's stated/recommended reference accuracy (or design accuracy). The methodology used is planned to be captured in plant procedures and/or programs.

The NRC staff notes the estimated instrument channel design accuracies and methodology appear to be sufficient to maintain the instrument channels to within their designed accuracies before significant drift can occur. The NRC staff plans to verify that the licensee's proposed instrument performance is consistent with these estimated accuracy values. Further, the NRC staff plans to verify that the channels will retain these accuracy performance values following a loss of power and subsequent restoration of power. The staff has identified these requests as:

**RAI #13**

**Please provide an analysis verifying the proposed instrument performance is consistent with these estimated accuracy normal and BDB values. Please demonstrate the**

**channels will retain these accuracy performance values following a loss of power and subsequent restoration of power.**

**RAI #14**

**Please provide a description of the methodology that will be used for determining the maximum allowed deviation from the instrument channel design accuracy to be employed under normal operating conditions as an acceptance criterion for a calibration procedure to alert operators and technicians of the need for adjustment to within normal design accuracy.**

*(This information was previously requested as RAI-7.b in NRC email dated July 18, 2013)*

3.10 Design Features: Testing

Attachment 2 of Order EA-12-051 states, in part, that

The instrument channel design shall provide for routine testing and calibration.

NEI 12-02 states, in part, that

Static or non-active installed (fixed) sensors can be used and should be designed such that testing and/or calibration can be performed in-situ. For microprocessor based channels the instrument channel design shall be capable of testing while mounted in the pool.

In its OIP, the licensee stated that the display/processor performs automatic in-situ calibration and automatically monitors for cable, connector, and probe faults using time domain reflectometry (TDR) technology. The licensee also stated that channel degradation due to age or corrosion is not expected but can be identified by monitoring trends.

In its letter dated August 19, 2013, the licensee stated, in part, that

The level instrument automatically monitors the integrity of its level measurement system using in-situ capability. Deviation of measured test parameters from manufactured or as-installed configuration beyond a configurable threshold prompts operator intervention.

Periodic calibration checks of the signal processor electronics to extrinsic National Institute of Standards and Technology (NIST)-traceable standards can be achieved through the use of standard measurement and test equipment.

The probe itself is a perforated tubular coaxial waveguide with defined geometry and is not calibrated. It is planned to be periodically inspected electromagnetically using Time-Domain Reflectometry (TDR) at the probe hardline cable connector to demonstrate that the probe assembly meets manufactured specification and visually to demonstrate that there has been no mechanical deformation or fouling.



Each instrument electronically logs a record of measurement values over time in non-volatile memory that is compared to demonstrate constancy, including any changes in pool level, such as that associated with the normal evaporative loss/refilling cycle. The channel level measurements can be directly compared to each other (i.e., regular cross-channel comparisons). Direct measurements of SFP level may be used for diagnostic purposes if cross-channel comparisons are anomalous.

The NRC staff notes the results of the comparison between the SFP level instrument channels can be compared to acceptance criteria described in Section 3.9 above to determine if recalibration or troubleshooting is needed. However, the NRC staff has concerns with the lack of information regarding the feasibility of the licensee's process for in-situ calibration to ensure that the design accuracy will be maintained. The staff has identified this request as:

**RAI #15**

**Please provide a description of the in-situ calibration process at the SFP location that will result in the channel calibration being maintained at its design accuracy.**

3.11 Design Features: Display

Attachment 2 of Order EA-12-051 states, in part, that

Trained personnel shall be able to monitor the spent fuel pool water level from the control room, alternate shutdown panel, or other appropriate and accessible location. The display shall provide on-demand or continuous indication of spent fuel pool water level.

NEI 12-02 states, in part, that

The intent of this guidance is to ensure that information on SFP level is reasonably available to the plant staff and decision makers. Ideally there will be an indication from at least one channel of instrumentation in the control room. While it is generally recognized (as demonstrated by the events at Fukushima Daiichi) that SFP level will not change rapidly during a loss of spent fuel pool cooling scenario, more rapid SFP drain down cannot be entirely discounted. Therefore, the fact that plant personnel are able to determine the SFP level will satisfy this requirement, provided the personnel are available and trained in the use of the SFP level instrumentation (see Section 4.1) and that they can accomplish the task when required without unreasonable delay.

SFP level indication from the installed channel shall be displayed in the control room, at the alternate shutdown panel, or another appropriate and accessible location (reference NEI 12-06). An appropriate and accessible location shall have the following characteristics:

- occupied or promptly accessible to the appropriate plant staff giving appropriate consideration to various drain down scenarios,

- outside of the area surrounding the SFP floor, e.g., an appropriate distance from the radiological sources resulting from an event impacting the SFP,
- inside a structure providing protection against adverse weather, and
- outside of any very high radiation areas or LOCKED HIGH RAD AREA during normal operation.

If multiple display locations beyond the required “appropriate and accessible location” are desired, then the instrument channel shall be designed with the capability to drive the multiple display locations without impacting the primary “appropriate and accessible” display.

In its OIP, the licensee stated that the primary (Channel A) and backup (Channel B) instrument displays would be located in the Main Control Room and the Auxiliary Building, respectively.

In its letter dated August 19, 2013, the licensee stated, in part, that

The backup display will be mounted in the Radwaste Control Panel Room Cabinet C104 at the 590' elevation of the Auxiliary Building. This cabinet is located in Passage 121, and can be accessed via Stairwell No. 16 and Door 75, or via Corridor 106A through Door 190. Both Stairwell 16 and Corridor 106A can be approached from the north, east, and west via Corridor 106.

A habitability evaluation is in progress. The updated information is currently scheduled to be included in the second SFP six-month status report due February 28, 2014.

The FLEX staffing plan is currently scheduled to be completed by December 2013. The information is scheduled to be included in the FLEX six-month status report for February 28, 2014.

If necessary, portable radios will be used to communicate with decision makers.

The permanently mounted back-up channel display can be considered promptly accessible, because it can be reached within the 30 minute deployment requirement that exists for portable instrumentation (Section 3.1 of NEI 12-02).

The NRC staff notes the NEI guidance for “Display” specifically mentions the control room as an acceptable location for SFP instrumentation displays as it is occupied or promptly accessible, outside the area surrounding the SFP, inside a structure providing protection against adverse weather and outside of any very high radiation areas or LOCKED HIGH RAD AREA during normal operation. The licensee’s proposed location for the primary SFP instrumentation display appears to be consistent with NEI 12-02, as endorsed by the ISG.

Regarding the backup display, the NRC staff notes the intended location of the secondary SFP instrumentation display is the radwaste control panel room. The NRC staff has concerns with the licensee’s lack of information regarding the accessibility, habitability, availability of personnel

and communications as it relates to the location of the SFP level instrumentation backup display. The staff has identified this request as:

**RAI #16**

**For the SFP level instrumentation backup display located in the radwaste control panel room, please describe the evaluation used to validate the display location can be accessed without unreasonable delay following a BDB event. Include the time available for personnel to access the display as credited in the evaluation, as well as the actual time (e.g., based on walk-throughs) that it will take for personnel to access the backup display. Additionally, please include a description of the radiological and environmental conditions on the paths personnel might take. Describe whether the display location remains habitable for radiological, heat and humidity, and other environmental conditions following a BDB event. Describe whether personnel are continuously stationed at the backup display or monitor the display periodically.**

3.12 Programmatic Controls: Training

Attachment 2 of Order EA-12-051 states, in part, that

Personnel shall be trained in the use and the provision of alternate power to the primary and backup instrument channels.

NEI 12-02 states, in part, that

The personnel performing functions associated with these SFP level instrumentation channels shall be trained to perform the job specific functions necessary for their assigned tasks (maintenance, calibration, surveillance, etc.). SFP instrumentation should be installed via the normal modification processes. In some cases, utilities may choose to utilize portable instrumentation as a portion of their SFP instrumentation response. In either case utilities should use the Systematic Approach to Training (SAT) to identify the population to be trained. The SAT process should also determine both the initial and continuing elements of the required training.

In its OIP, the licensee stated, in part, that

The Systematic Approach to Training (SAT) will be used to identify the population to be trained and to determine both the initial and continuing elements of the required training. Training will be completed prior to placing the instrumentation in service.

The licensee's proposed plan, with respect to training personnel in the use and the provision of alternate power to the primary and backup instrument channels, including the approach to identifying the population to be trained, appears to be consistent with NEI 12-02, as endorsed by the ISG.

3.13 Programmatic Controls: Procedures

Attachment 2 of Order EA-12-051 states, in part, that

Procedures shall be established and maintained for the testing, calibration, and use of the primary and backup spent fuel pool instrument channels.

NEI 12-02 states, in part, that

Procedures will be developed using guidelines and vendor instructions to address the maintenance, operation and abnormal response issues associated with the new SFP instrumentation.

In its OIP, the licensee stated that procedures for maintenance and testing would be developed using regulatory guidelines and vendor instructions.

In its letter dated August 19, 2013, the licensee stated, in part, that

Vendor recommended inspection, maintenance, and repair procedures for the liquid level measurement system have been developed through the vendor's 30-year experience developing and manufacturing liquid level measurement and cable testing instrumentation. These are for the most part specific to the system's proprietary electronics, subject to relevant industry standards for electronics fabrication and inspection and vendor's quality management system.

Where relevant, standards for naval shipboard liquid level indicating equipment have been used to develop procedures for operation, abnormal response, and administrative controls.

Portable instrumentation is not utilized. Both primary and backup SFPI channels permanent hard-wired installation.

The specific procedures to be used to capture the required activities described in this RAI response have not yet been developed but are planned to be developed in accordance with the vendor recommendations and END processes and procedures.

These procedures will contain the technical objectives associated with the maintenance, inspection, testing, repair and utilization of the SFPI. Portable instrumentation is not utilized. Both primary and backup SFPI channels incorporate permanent hard-wired installation.

The NRC staff has concerns with the licensee's lack of information regarding the procedures that should be established and maintained for the testing, calibration, and use of the primary and backup spent fuel pool instrument channels notes that the information regarding the procedures for the testing, calibration, and use. The staff has identified this request as:

**RAI #17**

**Please provide a list of the procedures addressing operation (both normal and abnormal response), calibration, test, maintenance, and inspection that will be developed for use of the SFP instrumentation. The licensee is requested to include a brief description of the specific technical objectives to be achieved within each procedure.**

*(This information was previously requested as RAI-10 in the NRC letter dated July 18, 2013. However, based on feedback from the licensees, it has been revised as above.)*

3.14 Programmatic Controls: Testing and Calibration

Attachment 2 of Order EA-12-051 states, in part, that

Processes shall be established and maintained for scheduling and implementing necessary testing and calibration of the primary and backup spent fuel pool level instrument channels to maintain the instrument channels at the design accuracy.

NEI 12-02 states, in part, that

Processes shall be established and maintained for scheduling and implementing necessary testing and calibration of the primary and backup SFP level instrument channels to maintain the instrument channels at the design accuracy. The testing and calibration of the instrumentation shall be consistent with vendor recommendations or other documented basis.

In its OIP, the licensee stated the station procedures and preventive maintenance tasks will be developed to perform required surveillance testing, calibration, backup battery maintenance, functional checks, and visual inspections of the probes.

In its letter dated August 19, 2013, the licensee stated, in part, that

Performance tests (functional checks) are automated and/or semi-automated (requiring limited operator interaction) and are performed through the instrument menu software and initiated by the operator. There are a number of other internal system tests that are performed by system software on an essentially continuous basis without user intervention but which can also be performed on an on-demand basis with diagnostic output to the display for the operator to review. Other tests such as menu button tests, level alarm, and alarm relay tests are only initiated manually by the operator. Performance checks are described in detail in the vendor operator's manual, and the applicable information is planned to be contained in plant operating procedures.

Performance tests are planned to be performed periodically as recommended by the equipment vendor, for instance quarterly but no less often than the calibration interval of two years.

Channel functional tests per operations procedures with limits established in consideration of vendor equipment specifications are planned to be performed at

appropriate frequencies established equivalent to or more frequently than existing spent fuel pool instrumentation.

Manual calibration and operator performance checks are planned to be performed in a periodic scheduled fashion with additional maintenance on an as-needed basis when flagged by the system's automated diagnostic testing features.

Channel calibration tests per maintenance procedures with limits established in consideration of vendor equipment specifications are planned to be performed at frequencies established in consideration of vendor recommendations.

Periodic (e.g., quarterly or monthly) review of the system level history and log files and routine attention to any warning message on the system display is recommended by the vendor. Formal calibration checks are recommended by the vendor on a two-year interval to demonstrate calibration to external NIST-traceable standards. Formal calibration check surveillance interval and timing would be established consistent with applicable guidance (i.e., NEI 12-02, Section 4.3; on a refueling outage interval basis and within 60 days of a planned refueling outage). Items such as system batteries are planned to be assessed under the preventive maintenance (PM) program for establishment of replacement frequency. Surveillance/PM timing/performance are planned to be controlled via tasks in the PM program.

In its letter dated August 19, 2013, the licensee stated, in part, that

SFPI channel/equipment maintenance/preventative maintenance and testing program requirements to ensure design and system readiness are planned to be established in accordance with ENO's processes and procedures and in consideration of vendor recommendations to ensure that appropriate regular testing, channel checks, functional tests, periodic calibration, and maintenance is performed. Subject maintenance and testing program requirements are planned to be developed during the SFPI modification design process.

Both primary and backup SFPI channels incorporate permanent installation (with no reliance on portable, post-event installation) of relatively simple and robust augmented quality equipment. Permanent installation coupled with stocking of adequate spare parts reasonably diminishes the likelihood that a single channel (and greatly diminishes the likelihood that both channels) is (are) out-of-service for an extended period of time.

In its letter dated August 19, 2013, the licensee also provided a table with compensatory actions for unlikely extended out-of-service events.

The NRC staff notes the licensee proposed approach regarding compensatory actions with respect to testing and calibration appears to be consistent with NEI 12-02, as endorsed by the ISG. The staff has concerns regarding the scheduling and implementing necessary testing and calibration of the primary and backup SFP level instrument channels to maintain the instrument channels at the design accuracy. The staff has identified this request as:

## **RAI #18**

**Please provide further information describing the maintenance and testing program the licensee will establish and implement to ensure that regular testing and calibration is performed and verified by inspection and audit to demonstrate conformance with design and system readiness requirements. Include a description of your plans for ensuring that necessary channel checks, functional tests, periodic calibration, and maintenance will be conducted for the level measurement system and its supporting equipment.**

### **3.15 Instrument Reliability**

NEI 12-02 states, in part, that

A spent fuel pool level instrument channel is considered reliable when the instrument channel satisfies the design elements listed in Section 3 [Instrument Design Features] of this guidance and the plant operator has fully implemented the programmatic features listed in Section 4 [Program Features].

In its OIP, the licensee stated the reliability of the primary and backup instrument channels would be assured by conformance with the guidelines of NRC JLD-ISG-2012-03 Revision 0 and NEI 12-02 Revision 1.

Upon acceptable resolution of the RAIs noted above, the NRC staff will be able to make a conclusion regarding the reliability of the SFP instrumentation.

## **4.0 CONCLUSION**

The NRC staff is unable to complete its evaluation regarding the acceptability of the licensee's plans for implementing the requirements of Order EA-12-051 due to the need for additional information as described above. The staff will issue an evaluation with its conclusion after the licensee has provided the requested information.

status updates, as the information becomes available. However, the staff requests that all information be provided by March 31, 2015, to ensure that any issues are resolved prior to the date by which the licensee must complete full implementation of Order EA-12-051. The licensee should adjust its schedule for providing information to ensure that all this information is provided by the requested date.

If you have any questions regarding this letter, please contact me at 301-415-8371 or via e-mail at [Mahesh.Chawla@nrc.gov](mailto:Mahesh.Chawla@nrc.gov).

Sincerely,

**/RA/**

Mahesh Chawla, Project Manager  
Plant Licensing Branch III-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-255

Enclosure:  
Interim Staff Evaluation and  
Request for Additional Information

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