

NRR-PMDAPEm Resource

From: Singal, Balwant
Sent: Thursday, April 17, 2014 1:52 PM
To: Lsterling@stpegs.com
Cc: Morris, James [jrmorris@STPEGS.COM] (jrmorris@STPEGS.COM)
Subject: License Amendment Request for South Texas Project, Units 1 and 2 Fire Protection Program Changes - Request for Additional Information - TAC Nos. MF2477 and MF2478

Lance,

By letter dated July 23, 2013 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML13212A243), STP Nuclear Operating Company (STPNOC, the licensee) submitted license amendment request to revise South Texas Project (STP), Units 1 and 2, Fire Protection Program related to alternate shutdown capability. Specifically, STPNOC requested crediting the performance of certain operator actions in the control room, including one automatic operation, in the event a fire requires evaluation of the control room. The NRC staff needs the following additional information requested by the PRA Operations and Human Factors Branch (AHPB) to complete its review.

Request for Additional Information:

1. Section 3.7.1 of Enclosure 1 to the application dated July 23, 2013, "Does adequate time exist to perform the proposed operator actions," states the following, in part:

"The capability to perform the operator actions following a reactor trip is assessed in the aggregate. The validation of the operator actions are timed in sequence such that the time to perform any individual action is dependent on performing the prior required action(s). Operator walk down performance data indicates that these actions can be performed in less than 90 seconds (a recent performance demonstrated that the steps were performed in 58 seconds) following initiation of the reactor trip. This meets the thermal-hydraulic analysis which requires all the actions to be completed in less than 120 seconds."

It is not clear if the time of 58-90 seconds to perform operator action is for one particular operator action or for all the actions identified in

Table 1, "Proposed Operator Actions". Please provide a clear discussion if the statement applies to performance of all the actions in Table 1. Please explain the reason for singling out one operator action, if the statement applies to only one particular operator action.

2. Note 3 to Table 1 states:

"Capability to perform the operator action is demonstrated in the aggregate. The operator actions are timed in sequence such that the time to perform any individual action is dependent on successfully performing the previous action(s)."

It is not clear from the statement if the actions are performed in parallel by multiple operators or all the actions are performed in sequence. Based on the U.S. Nuclear Regulatory Commission (NRC) staff understanding these actions are to be performed in sequence. Please provide a clear discussion.

Draft Request for Additional information (RAI) was transmitted on March 26, 2014 and a RAI clarification call was held on April 1, 2014. It was agreed that STPNOC will provide the response within 30 days from the date of this e-mail.

Please treat this e-mail as formal transmittal of RAIs. Please note that the Request for Additional Information (RAI) from the Reactor Systems Branch (SRXB) and Fire Protection Branch (AFPB) has already been transmitted.

Please advise if you have any questions.

Balwant K. Singal
Senior Project Manager (Comanche Peak and STP)
Nuclear Regulatory Commission
Division of Operating Reactor Licensing
Balwant.Singal@nrc.gov
Tel: (301) 415-3016
Fax: (301) 415-1222

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Created By: Balwant.Singal@nrc.gov

Recipients:
"Morris, James [jrmorris@STPEGS.COM] (jrmorris@STPEGS.COM)" <jrmorris@STPEGS.COM>
Tracking Status: None
"Lsterling@stpegs.com" <Lsterling@stpegs.com>
Tracking Status: None

Post Office: HQCLSTR02.nrc.gov

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