February 26, 2015

MEMORANDUM TO: Anthony J. Mendiola, Chief
Licensing Processes Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

FROM: Michelle C. Honcharik, Senior Project Manager ***/RA/***
Licensing Processes Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

SUBJECT: FORTHCOMING PUBLIC MEETING BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND THE TECHNICAL SPECIFICATIONS TASK FORCE

DATE & TIME: Tuesday, March 10, 2015
12:45 p.m. - 2:15 p.m.

LOCATION: U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike, Room 16-B4
Rockville, MD 20852

PURPOSE: To discuss requests for additional information (RAIs) related to Technical Specifications Task Force (TSTF) Traveler TSTF-551. Draft RAIs are enclosed. There is no agenda for the meeting.

CATEGORY 2∗: This is a Category 2 Meeting. The public is invited to participate in this meeting by discussing regulatory issues with the NRC at the end of the meeting.

MEETING CONTACT: Michelle C. Honcharik, NRR/DPR
(301) 415-1774
Michelle.Honcharik@nrc.gov

∗ Commission's Policy Statement on "Enhancing Public Participation in NRC Meetings" (*67 FR 36920*), May 28, 2002

NOTE: The Nuclear Regulatory Commission (NRC) provides reasonable accommodation to individuals with disabilities where appropriate. If you need a reasonable accommodation to participate in this meeting or need this meeting notice or other information from the meeting in another format (e.g., Braille, large print), please notify the NRC's meeting coordinator. Determinations on requests for reasonable accommodation will be made on a case-by-case basis.

PARTICIPANTS: Participants from the NRC include members of the Office of Nuclear Reactor Regulation (NRR) and the Office of New Reactors (NRO).

NRC	TSTF
M. Honcharik, NRR	B. Mann, et al.
R. Elliott, NRR, et al.	

Project No. 753

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DATE	02/26/2015	02/26/2015	02/26/2015	02/26/2015

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DRAFT REQUEST FOR ADDITIONAL INFORMATION

TECHNICAL SPECIFICATIONS TASK FORCE TSTF-551, REVISION 0

"ADDRESS TRANSIENT SECONDARY CONTAINMENT CONDITIONS"

By letter dated October 30, 2014 (Agencywide Documents Access and Management System Accession No. ML14304A034), the Technical Specifications Task Force submitted Revision 0 of TSTF-551, "Address Transient Secondary Containment Conditions," for NRC staff review. TSTF-551 is applicable to Boiling Water Reactor plants.

CONTAINMENT AND VENTILATION BRANCH

RAI-SCVB-1: Proposed LCO 3.6.4.1 Note – Openings

Based on the past operating experiences for any representative plant, please provide a detailed list for the [secondary] containment boundary openings (name, location, opening times, duration) that had been reported under Title 10 of the *Code of Federal Regulations* (10 CFR) 50.72 and 50.73. In addition, summarize and indicate the openings that will be considered as "non-reportable" as proposed by this TSTF-551.

RAI-SCVB-2: Proposed LCO 3.6.4.1 Note – "Opened Intermittently"

The proposed note states that the [secondary] containment may be opened intermittently. Please explain "opened intermittently" in terms of quantitative measure, like opening times and duration etc. Provide and justify the basis for this quantitative measure.

RAI-SCVB-3: Proposed LCO 3.6.4.1 Note Bases – "Rapidly Restored"

The proposed note Bases states that the note will be applied to openings in the [secondary] containment that can be rapidly restored. Please explain "rapidly restored" in terms of quantitative measure, like timing etc. Provide and justify the basis for this quantitative measure.

RAI-SCVB-4: Proposed LCO 3.6.4.1 Note – Safety Evaluation

Please provide an evaluation showing that, with the planned openings (times and duration), the [secondary] containment remains OPERABLE but degraded, or if INOPERABLE that each instance and the cumulative sum of all the instances over a year are not significant to safety.

RAI-SCVB-5: Proposed BWR/4 SR 3.6.4.1.3 Revision

The ineffectiveness of interlocks does not constitute a convincing reason for revising BWR/4 Surveillance Requirement (SR) 3.6.4.1.3. Conversely, the ineffectiveness of interlocks should be corrected. Furthermore, a so-called consistency with BWR/6's does not constitute a convincing reason for revising BWR/4 SR 3.6.4.1.3, either. Please remove the proposed exception to BWR/4 SR 3.6.4.1.3.

ENCLOSURE

RAI-SCVB-6: Proposed Revision on BWR/6 STS Bases for SR 3.6.4.1.2

It appears that the strikeout of wordings “In this application, the term ‘sealed’ has no connotation of leak tightness” in the proposed revision of BWR/6 STS Bases for SR 3.6.4.1.2 was done in error because the same wordings are still kept for BWR/4 STS Bases for SR 3.6.4.1.2. Both the BWR/4 and BWR/6 interpretations should be consistent. Otherwise, please provide a justification for such a difference.

TECHNICAL SPECIFICATION BRANCH

RAI-STSB-1: Proposed LCO 3.6.4.1 Note

LCO 3.6.4.1 requires [secondary] containment to be OPERABLE during Modes 1, 2, and 3, during movement of [recently] irradiated fuel, and during OPDRVs. Condition C is entered when [Secondary] containment is inoperable during movement of [recently] irradiated fuel assemblies in the [secondary] containment or during OPDRVs. Required Action C.1 requires suspension of the movement of [recently] irradiated fuel assemblies in the [secondary] containment with a Completion Time of Immediately. Required Action C.2 requires the initiation of action to suspend OPDRVs with a completion time of Immediately.

The technical justification for the addition of this note relies, in part, on the fact that the momentary loss of [secondary] containment integrity is significantly less than the 4 hour time period permitted to restore integrity in by the Required Action associated with Condition A. The staff believes that it is appropriate to suspend the movement of [recently] irradiated fuel and OPDRVs when [secondary] containment is inoperable. Please modify the note allowing temporary openings in secondary containment to restrict its applicability to Modes 1, 2, and 3.

RAI-STSB-2: Proposed SR 3.6.4.1.1 Note

SR 3.6.4.1.1 requires the [secondary] containment to be greater than a required vacuum limit at all times. The discussion of the proposed note states that [secondary] containment pressure may be momentarily less than the required vacuum for a number of reasons, such as during entry and exit from the [secondary] containment with both the inner and outer doors open simultaneously, during high winds, and during maintenance, testing, or swapping of the normal ventilation subsystems. The note would allow brief transients below the required vacuum limit without declaring the [secondary] containment inoperable.

The technical justification describes the fact that high winds would cause dispersion of any radioactive materials released. The staff is concerned that the wind speed necessary to cause this phenomenon is plant-specific. Furthermore, the duration of this condition is beyond the administrative control of the licensee. Please explain the basis for concluding that high winds would only cause pressure to be momentarily less than required vacuum. Please insert a description of the methodology each plant would use to calculate its plant threshold for declaring a high wind condition. Alternatively, please delete the discussion of high winds.

RAI-STSB-3: Proposed SR 3.6.4.1.5 Note:

SR 3.6.4.1.5 requires verification that one SGT subsystem can maintain the [secondary] containment pressure ≥ 0.25 inch of vacuum water gauge for one hour. The discussion states that it is possible for the [secondary] containment pressure to be momentarily less than the required vacuum during the test for a number of reasons, such as entry and exit from the [secondary] containment with both the inner and outer doors open simultaneously, high winds, or during maintenance, testing, or swapping of the normal ventilation subsystems. The proposed note states that momentary transients less than the required vacuum do not invalidate this test.

The Bases for SR 3.6.4.1.5 states that the 1 hour test period allows [secondary] containment to be in thermal equilibrium at steady state conditions. The primary purpose of these SR[s] is to ensure [secondary] containment boundary integrity. The secondary purpose of these SR[s] is to ensure that the SGT subsystem being tested functions as designed. Please explain how the primary purpose of the test is accomplished if there are momentary instances of pressure being less than the required vacuum acceptance criterion. Please also explain why it would be necessary for entry, exit, maintenance, testing, or swapping of normal ventilation subsystems during the one-hour period in which this SR is being conducted.

RAI-STSB-4: Proposed SR 3.6.4.1.1 Bases Revision

The proposed change to the Bases for SR 3.6.4.1.1 would change the current statement that this SR ensures that the [secondary] containment boundary is sufficiently leak tight to preclude exfiltration under expected wind conditions to state that the SR ensures [secondary] containment pressure is within the accident analyses assumptions.

The discussion states that this is because the statement that the SR acceptance criteria is intended to preclude exfiltration under expected wind conditions is not correct. The discussion further states that high winds can result in temporary failure to meet the acceptance criteria.

Please provide additional detail explaining how the effects of wind conditions on [secondary] containment integrity are considered in the accident analysis.

cc:

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