NRR-PMDAPEm Resource

From: Chawla, Mahesh
Sent: Tuesday, April 14, 2015 5:06 PM
To: michael.millen@nexteraenergy.com; Cross, William (WILLIAM.CROSS@fpl.com)
Cc: Pelton, David; Dinsmore, Stephen; Green, Kimberly; Hyslop, JS; Hamzehee, Hossein; Barrett, Harold; Klein, Alex; Robinson, Jay; Oliver, David; Barclay, Kevin; Cameron, Jamnes
Subject: Request for Additional Information - Point Beach Nuclear Plant, Unit 1 and 2 - MF2372 and MF2373

By letter dated June 26, 2013 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML131820453), NextEra Energy Point Beach, LLC (NextEra) submitted a license amendment request for the Point Beach Nuclear Plant, Units 1 and 2 (Point Beach). The proposed license amendment request (LAR) would transition the fire protection licensing basis at Point Beach to Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.48(c), National Fire Protection Association Standard NFPA 805.

On April 6, 2015, a public teleconference was conducted to discuss Main Control Room abandonment issue with the licensee. The meeting notice and agenda, dated March 23, 2015, are available in the Agencywide Documents Access and Management System (ADAMS) at Accession No. ML15091A736. During the meeting, the Nuclear Regulatory Commission (NRC) staff had expressed a need for further clarification of the information previously submitted on the docket. The NRC staff has provided the following request for additional information which they would like the licensee to address on the docket.

Request for Additional Information

PRA RAI 16.01.01 (Change-in-risk calculation for MCR abandonment fire areas)

The response to PRA RAI 16.01 (in letter dated January 16, 2015) regarding how change-in-risk was calculated for MCR abandonment fire areas due to loss of control did not provide enough information to make all the steps and assumptions in the approach completely understood. However, this response was augmented with information provided in the slides for the public meeting on April 6, 2015 (ADAMS Accession Number ML15091A736) which included further explanation about how the compliant and post-transition plants for MCR abandonment were modelled. Based on the methods and justification used by Point Beach in the FPRA as described in the meeting, please provide the following for MCR abandonment scenarios due to loss of control:

a. Explain how the VFDRs associated with the MCR abandonment fire areas (I.e., A24, A30, and A31) were identified, (i.e., assuming the operators remain in the MCR or go to the alternative shutdown area). As a part of this explanation, clarify whether or not any VFDRs for these fire areas were identified based on alternate shutdown functions or MCR functions. Also, indicate if VFDRs for MCR abandonment fire areas were developed with the same approach as non-alternate shutdown (ASD) areas. The relevant issues for this part of the RAI were discussed in slide 6 during the public conference call.

b. Explain how the CCDP and CLERP values are evaluated for fires in these scenarios for the compliant plant; e.g., relevant are Steps 1, 2, and 3 on slides 8, 9, 10, and 11 discussed in the public conference call. Include, for the compliant plant model, explanation of how VFDRs were resolved and explicitly how alternate shutdown is addressed in the model. As a part of your explanation, indicate the location from which command and control is assumed for your analysis. Discuss whether the compliant plant, through correcting the VFDRs in the variant plant, credits available paths to shutdown the plant beyond the single deterministic path, should those additional paths be unaffected by the fire. Also indicate if LOC due to fire damage occurs in the compliant model. Indicate if the quantitative values for the MCR compliant case exceed the 0.19/0.019 for the CCDP/CLERP due to LOC driven abandonment referred to in PRA RAI

responses 16 a), 10 d), 10.01 c), and 16.01 a), and thus whether the 0.19/0.019 was ever applied. If not used in the fire PRA, indicate how the 0.19/0.019 was used to support your analysis.

c. Explain how the CCDP and CLERP values are evaluated for these scenarios in the post transition plant. As a part of your explanation, indicate the location from which command and control is assumed for your analysis of the post transition plant. Explain whether the post transition model is realistic or conservative. The information from slide 7 presented in the public conference call could be used to support this part of the RAI.

d. Explain how the change in risk for these areas is calculated. Clarify whether the change in risk for these areas is calculated by setting the VDFRs to "success" in the compliant plant and to "failed" in the variant plant. If not, explain how the change in risk is estimated.

Please arrange a teleconference with the NRC to discuss this and your proposed schedule for providing the response on the docket. Thanks

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