

NRR-PMDAPEm Resource

From: Clark, Jeffrey S.:(GenCo-Nuc) [Jeffrey.Clark2@exeloncorp.com]
Sent: Tuesday, April 14, 2015 4:16 PM
To: Wyman, Stephen; DiFrancesco, Nicholas
Cc: Distel, David J:(GenCo-Nuc); Devlin-Gill, Stephanie; Aggarwal, Vinod K:(GenCo-Nuc); Giaco, Frank:(GenCo-Nuc); Behrend, Chuck L.:(GenCo-Nuc); Lucas, Jesse P:(GenCo-Nuc); Gallagher, Tracey L.:(GenCo-Nuc); Birmingham, Robert S:(GenCo-Nuc)
Subject: RE: Inquiry RE: Peach Bottom ESEP Report Clarifications
Attachments: Response to USNRC Questions for Peach Bottom ESEP Report FINAL CLEAN 4-14-15.docx
Importance: High

Mr. DiFrancesco/Mr. Wyman,

In response to your email below, Exelon is pleased to provide you with the attached responses to your questions. Please feel free to contact us with any further questions or clarifications needed to support the NRC's ESEP report reviews.

Thank You,

Jeff Clark

Jeffrey S. Clark, PE

**Fukushima Response Seismic Lead
630-657-3876 (Work)**

From: Clark, Jeffrey S.:(GenCo-Nuc)
Sent: Friday, April 10, 2015 3:15 PM
To: 'Wyman, Stephen'
Cc: Distel, David J:(GenCo-Nuc); Devlin-Gill, Stephanie; DiFrancesco, Nicholas; Aggarwal, Vinod K:(GenCo-Nuc); Giaco, Frank:(GenCo-Nuc); Behrend, Chuck L.:(GenCo-Nuc)
Subject: RE: Inquiry RE: Peach Bottom ESEP Report Clarifications

Mr. Wyman,

My apologies to you and the NRC as Exelon will be unable to provide our response to your questions today as requested in your email below for the Peach Bottom ESEP.

A late question came up today on one of our responses that will require some further discussions, prior to our responding.

Our current response target date is **Tuesday April 14, 2015**.

I will keep you informed if any further delays are encountered, however, it is our intention to reply ASAP.

Again our apologies for our delayed response.

Sincerely,
Jeff Clark

Jeffrey S. Clark, PE

Fukushima Response Seismic Lead

630-657-3876 (Work)

224-419-1450 (cell)

From: Wyman, Stephen [<mailto:Stephen.Wyman@nrc.gov>]
Sent: Friday, March 27, 2015 2:40 PM
To: Clark, Jeffrey S.:(GenCo-Nuc)
Cc: Distel, David J:(GenCo-Nuc); Devlin-Gill, Stephanie; DiFrancesco, Nicholas
Subject: Inquiry RE: Peach Bottom ESEP Report Clarifications

Mr. Clark,

In follow-up to our morning discussion, as part of the NRC review of the Peach Bottom ESEP report, the staff would appreciate clarification on the following technical items:

- 1) Provide the justification why the following components are not included in the ESEL for Units 2 & 3:
 - o 6 of 11 MSL SRVs for both Units
 - o Solenoid valve for MSL SRVs for both Units.
- 2) Section 3.2 of EPRI 3002000704 stated that “The selection process for the ESEL should assume the FLEX strategies (modifications, equipment, procedures, etc.) have been implemented.” The staff noted that not all “non-portable” FLEX components have been installed during the development of the licensee’s ESEP.

Clarify whether HCLFP evaluations will be performed to ensure they achieve the RLGM capacity when those “non-portable” FLEX components are installed in the future and propose any following actions.

- 3) Section 8.2 of the Peach Bottom ESEP report describes disposition of two components (2-13A-K033 & 3-13A-K033) whose HCLPF values (0.20g) are lower than the RLGM (0.24g) as shown in Attachments C and D. However, there is no disposition of the components (2-13A-K010 & 2-13A-K011 in Attachment C, and 3-13A-K010 & 3-13A-K011 in Attachment D) whose HCLPF values (0.14g) are also lower than the RLGM (0.24g). Rather, the licensee stated (in tabular cells of Attachments C & D) that these items will be “resolved by operator action”. Please describe the proposed licensee action for components 2-13A-K010, 2-13A-K011, 3-13A-K010, and 3-13A-K011 and clarify why the proposed actions for these components are not captured in Section 8 - “ESEP Conclusions and Results”.

As schedules did not allow much time to discuss the requested clarifications, I will contact you on Monday, March 30th as a courtesy follow-up to ensure that you have no questions. An email response similar to previous ESEP clarification requests will be sufficient to support the ESEP report review. A response around April 10, if practicable, would be greatly appreciated to support the planned review schedule.

Please let me or Nick DiFrancesco (at 301-415-1115) know if you have any questions and concerns.

Thanks,

Steve

Stephen M. Wyman

USNRC/NRR/JLD/HMB

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Subject: RE: Inquiry RE: Peach Bottom ESEP Report Clarifications
Sent Date: 4/14/2015 4:16:25 PM
Received Date: 4/14/2015 4:16:30 PM
From: Clark, Jeffrey S.:(GenCo-Nuc)

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MESSAGE	4960	4/14/2015 4:16:30 PM
Response to USNRC Questions for Peach Bottom ESEP Report FINAL CLEAN 4-14-15.docx 24999		

Options

Priority: High
Return Notification: No
Reply Requested: Yes
Sensitivity: Normal
Expiration Date:
Recipients Received:

Exelon Response to USNRC Questions for Peach Bottom ESEP Report

In response to the email request dated March 27, 2015 from the USNRC's Mr. Stephen Wyman, Exelon is pleased to provide you with the responses below. Please feel free to contact us with any further questions or clarifications needed to support the NRC's ESEP report reviews.

Question 1:

Provide the justification why the following components are not included in the ESEL for Units 2 & 3:

- 6 of 11 MSL SRVs for both Units
- Solenoid valve for MSL SRVs for both Units

Response to Question 1:

- The MSL SRVs not included on the ESEL are Non-ADS SRVs and do not have the larger N2 accumulators. Our FLEX implementation strategy only requires use of the ADS SRVs.
- The solenoid valves (SV-2(3)-16-071K) for the MSL SRVs (RV-2(3)-2-071K) for both Units are mounted to a plate, which is mounted to the AOV. This item is "Rule of Box" to the AOV (and is thus okay). "Rule of the Box" is described in the "Generic Implementation Procedure (GIP) for Seismic Verification of Nuclear Plant Equipment", Rev 3A (Section 3.3.3).

Question 2(Section III "Selection of the Equipment List"):

Section 3.2 of EPRI 3002000704 stated that "The selection process for the ESEL should assume the FLEX strategies (modifications, equipment, procedures, etc.) have been implemented." The staff noted that not all "non-portable" FLEX components have been installed during the development of the licensee's ESEP.

Clarify whether HCLFP evaluations will be performed to ensure they achieve the RLGM capacity when those "non-portable" FLEX components are installed in the future and propose any following actions.

Response to Question 2:

All "non-portable" FLEX components procured and installed or planned for installation that would meet the criteria to be included on the ESEL, per Section 3 of EPRI 3002000704, have been or will be evaluated to RLGM (2xSSE) levels using HCLPF allowables in addition to current plant licensing basis requirements. Design guidance

was provided to the Exelon fleet describing these requirements for FLEX modifications to be installed in the future. Note that Exelon's ESELs are based on the FLEX implementation strategy as of the 3rd 6-month FLEX Update Submittals (ML14241A252)(August 2014). No further actions are proposed.

Question 3:

Section 8.2 of the Peach Bottom ESEP report describes disposition of two components (2-13A-K033 & 3-13A-K033) whose HCLPF values (0.20g) are lower than the RLGGM (0.24g) as shown in Attachments C and D. However, there is no disposition of the components (2-13A-K010 & 2-13A-K011 in Attachment C, and 3-13A-K010 & 3-13A-K011 in Attachment D) whose HCLPF values (0.14g) are also lower than the RLGGM (0.24g). Rather, the licensee stated (in tabular cells of Attachments C & D) that these items will be "resolved by operator action". Please describe the proposed licensee action for components 2-13A-K010, 2-13A-K011, 3-13A-K010, and 3-13A-K011 and clarify why the proposed actions for these components are not captured in Section 8 - "ESEP Conclusions and Results".

Response to Question 3:

The 2-13A-K010, 2-13A-K011, 3-13A-K010 and 3-13A-K011 are RCIC Aux Trip relays where the RCIC trip can be reset from the Main Control Room. The operator actions allowing their exclusion are described in Peach Bottom site procedure SO 13.7.A-2(3) – "Recovery from RCIC system isolation or Turbine Trip". Text was not included in Section 8 of the Peach Bottom ESEP submittal report as there were no planned modifications for these relays. Given the operator actions described above, these relays could have been excluded from the ESEL based on Section 3.2 (top of page 3-3) of EPRI 3002000704, but were included for completeness.