

NRR-PMDAPEm Resource

From: Clark, Jeffrey S.:(GenCo-Nuc) [Jeffrey.Clark2@exeloncorp.com]
Sent: Friday, May 01, 2015 5:19 PM
To: DiFrancesco, Nicholas; Wyman, Stephen
Cc: Devlin-Gill, Stephanie; Behrend, Chuck L.:(GenCo-Nuc); Aggarwal, Vinod K.:(GenCo-Nuc); Distel, David J.:(GenCo-Nuc); Hilton, William B.:(GenCo-Nuc); Tanton, Sean:(GenCo-Nuc); Chouinard, Matthew:(GenCo-Nuc); Sanchez, Jorge L.:(GenCo-Nuc); Amway, Phillip M.:(GenCo-Nuc); Trenka, Harold:(GenCo-Nuc); Schupp, David P.:(GenCo-Nuc); Mokkapati, Sailaja:(GenCo-Nuc)
Subject: RE: LaSalle ESEP Report Clarifications Corrected
Attachments: Response to USNRC Questions for LaSalle ESEP Report FINAL 5-1-15.docx

Mr. DiFrancesco/Mr. Wyman,

In response to your email below, Exelon is pleased to provide you with the attached responses to your questions. Based on our previous discussions we are providing you this information on our mutually agreed upon extended request date of May 1, 2015. 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: Wyman, Stephen [<mailto:Stephen.Wyman@nrc.gov>]
Sent: Wednesday, April 08, 2015 3:05 PM
To: Clark, Jeffrey S.:(GenCo-Nuc)
Cc: DiFrancesco, Nicholas; Devlin-Gill, Stephanie
Subject: LaSalle ESEP Report Clarifications Corrected

Mr. Clark,

In follow-up to my April 8th voicemail, as part of the NRC review of the LaSalle ESEP report, the staff would appreciate clarification on the following technical items:

1. The ESEP submittal identifies the Fuel Pool Cooling and Emergency Makeup System as a flow-path for Phase 2 Core Cooling; however, it appears that the ESEL does not contain components within this flow-path. Confirm that no additional components within this flow path are required to be evaluated per the ESEP guidance. For example, confirm if any motor-operated valves in the Fuel Pool Cooling and Emergency Makeup flow-path are required to change position and whether they are feasible to be operated manually and locally. In addition, if these motor operated valves can be operated manually, confirm that this operator manual action is the credited action as a part of the FLEX strategies and the Sequence of Events.

2. The "to-be installed" severe accident capable vent was not identified as a modification. Please describe how you plan to demonstrate, and allow the staff to confirm, that the SSCs supporting the severe accident capable vent will meet the ESEP guidance.

An email response will likely be sufficient to support the ESEP report review, however, please be aware that your email response will be made publicly available in ADAMS. A response around April 22, 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 would like to schedule a clarification call or have any questions and concerns.

Thanks,
Steve

Stephen M. Wyman
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Subject: RE: LaSalle ESEP Report Clarifications Corrected
Sent Date: 5/1/2015 5:19:25 PM
Received Date: 5/1/2015 5:19:29 PM
From: Clark, Jeffrey S.:(GenCo-Nuc)

Created By: Jeffrey.Clark2@exeloncorp.com

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Options

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Recipients Received:

Exelon Response to USNRC Questions for LaSalleESEP Report

In response to the email request dated April 8, 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:

- The ESEP submittal identifies the Fuel Pool Cooling and Emergency Makeup System as a flow-path for Phase 2 Core Cooling; however, it appears that the ESEL does not contain components within this flow-path. Confirm that no additional components within this flow path are required to be evaluated per the ESEP guidance. For example, confirm if any motor-operated valves in the Fuel Pool Cooling and Emergency Makeup flow-path are required to change position and whether they are feasible to be operated manually and locally. In addition, if these motor operated valves can be operated manually, confirm that this operator manual action is the credited action as a part of the FLEX strategies and the Sequence of Events.

Response to Question 1:

- The sections of the Fuel Pool Cooling Emergency Makeup System (FC EMU System) that are used for Phase 2 Core Cooling consist of piping, manual valves and supports. The operator manual actions required to manipulate the manual valves for the FC EMU system are credited as part of the FLEX implementation strategies and Sequence of Events. There are no motor-operated valves required to be used in the FC EMU System for Phase 2 Core Cooling. In addition, there are no additional components in this flow path that are required to be evaluated per the ESEP guidance (EPRI 3002000704, Section 3).

Question 2:

- The "to-be installed" severe accident capable vent was not identified as a modification. Please describe how you plan to demonstrate, and allow the staff to confirm, that the SSCs supporting the severe accident capable vent will meet the ESEP guidance.

Response to Question 2:

- All SSC's associated with the HCVS/SACV system (HCVS Order Phase I equipment) will, at a minimum, be designed to the seismic qualification requirements defined in NEI 13-02, Rev 0, Section 5.2. In addition, all "non-portable" FLEX components associated with the HCVS/SACV system required to support EA-12-049 FLEX capability, that meet the criteria to be included on the ESEL, per Section 3 of EPRI 3002000704, have been or will be evaluated to the ESEP requirements. Note that Exelon's ESELs are based on the FLEX implementation strategy as of the 3rd 6-month FLEX Update Submittals (August 2014).
- NRC confirmation that the ESEP has been considered for the appropriate SSCs associated with the HCVS/SACV system required to support EA-12-049 FLEX capability can be achieved through review of the HCVS/SACV modification documents. As allowed by the ESEP criteria, only a single success path for HCVS/SACV operation will be considered. Exelon will describe within the modification documentation the seismic design bases for the SSCs of the HCVS/SACV system.