

## Vogle PEmails

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6151 NRC#4	Have additional changes been made since the ISV to manage feedwater flow oscillations? For the simulator, what is the expected performance for SFW valve cycling and when will it be obtained? Please confirm that this discrepancy is limited to shutdown conditions. It was the staff's understanding from ISV observations that this discrepancy was observed at low power during startup activities.
6726 NRC#11	Why is an alarm reflecting a power loss occurring when the power loss has not occurred? The CAS submittal appears to address an inconsistent alarm initiation following a power loss. Is the problem statement accurate? (Current problem statement, "Rod control urgent failure on loss of EK-12 appears inconsistently without loss of power.")
5577	Does training reinforce the procedural direction to maintain plant conditions within the more restrictive operating curves?
6151,5655, 6156, 6157, 6172	The first 3 discrepancies were noted as key drivers associated with secondary plant challenges. The last two were not included. None of the 5 are on the index of proposed corrections. Please explain what corrective actions are being taken to address the secondary control challenges. Please address the following staff concern: Increased workload distracts from operator's attention from analysis and decision making requirements of exam scenario. The workload is being created by incomplete modeling of expected plant performance. This creates the potential for a license applicant who does not pass the exam scenario to challenge the results knowing that the simulator doesn't model actual workload.
6410	What is the design condition that must be alleviated? Explain how it affects the simulator capability to support license exams.
No number	Significant CET swings were noted during the ISV but were not addressed in the aggregate study. Explain how these swings were addressed for the SNC simulators.
6484	Response appears to address NRC#22 (PZR water level variation) but not NRC#20 (Decreasing PZR water level). Explain why water level goes down on a leak through the PZR safety.
5998 HED#2	Explain how updated procedure basis documents ensure the timely assessment of CMT operating status. Does 6217 (bad quality on WR level indication) affect this assessment? Did HED#2 contribute to HED#3? (In Table E8-1, HED#3 says see #2.)
HED#3	
HED#5	Explain how updated procedure basis documents ensures the timely opening of reactor cavity recirculation valves.
HED#6	Explain how updated procedure basis documents ensures the timely opening of reactor cavity recirculation valves from DAS.
HED#8	Explain how updated procedure basis documents ensures the timely opening of reactor cavity recirculation valves from DAS.
<p>The following discrepancies are listed in the aggregate study. Their contribution to an aggregate impact is understood but the individual impact on thirteen 10 CFR 55.45 criteria is not. Typically this is because the discrepancy disposition is a general statement or the significance of the discrepancy is not understood. The staff uses the following criteria to determine individual discrepancy impact:</p> <ul style="list-style-type: none"> <li>The discrepancy directly challenges the capability of the simulator to model plant operations that would allow the 10 CFR 55.45 criteria to be implemented.</li> </ul>	

- The discrepancy adds additional complexity or confusion to the operational analysis and decision making process that is beyond what is expected in the design certification configuration or the startup configuration. For example significant, frequent control valve cycling that increases operator work load is not a satisfactory condition for exam scenarios. If the current control valve modeling reflects the current design, then interim measures are needed to improve the modeling until the design issues have been addressed. Stating that the simulator modeling reflects the current design typically does not provide a sufficient basis for decisions concluding the discrepancy has no impact on the simulator’s capability to support scenarios addressing the 10 CFR 55.45 criteria.
- The discrepancy introduces variables that make an exam scenario difficult to reproduce and thus challenges the ability to maintain uniform conditions between license applicants.

Dispositions that state, “Information sharing of the discrepancy was selected as the solution to this issue,” or “This issue was dispositioned as acceptable by the Simulator Review Committee (SRC) due to minimal impact on training,” are examples of dispositions that do not provide a sufficient basis for the determination that a discrepancy does not impact the simulator’s capability to support exam scenarios that address the 10 CFR 55.45 criteria.

6175	Need more info on why this condition is acceptable. Why does this not challenge approach to criticality? What is the impact on the automatic functions (demin water isolation from the RCS and charging makeup pump trips)?
5736	Understand the aggregate but not the individual impact. Do M1 and M2 banks always move together so the correct RIL alarm on M1 provides sufficient alarm?
6302	Will Bank overlap indication still be in error? If so what is the expected operator action? From the problem statement and disposition it appears that indication is changing but the change has no meaning yet it is part of the design. This seems like a very confusing situation for the operator on a reactivity related parameter.
5608	When these alarms occur, what priority is assigned by APS? How frequently do they occur? Do the answers to the previous questions cause one to think they could be a distraction?
5603, 5621, 6186, 5686, 5655, 6099, 5903	These discrepancies contain generic disposition statements that do not directly explain why the discrepancy does not affect the simulator’s ability to implement exam scenarios. However, the staff was able to reach a conclusion on the discrepancy without additional information. Since we quoted your disposition and noted that the disposition delta in our safety evaluation conclusions, we are providing this list so you can provide additional basis information if you choose too.
5924	Describe impact of this discrepancy. When are the indications used and for what? Does the “Crossed alarms” create potential confusion in understanding rod position?
6025	Alarm labeling appears to introduce confusion on the status of a significant component. This confusion could challenge exam consistency. Explain why this does not happen. The discrepancy disposition in the CAS submittal

	addressed impact on training rather than the impact on the simulator's capability to support license exams.
6171	Clarify disposition statement. What is meant by 'other faults are available? Are other independent alarms and indications available to identify the regulator failure?
6217	Is the operator able to use the narrow range for all procedural requirements (including verification of plant performance)?
6259	Provide more information on the impact of this discrepancy on the simulator's capability to implement exam scenarios. How frequently does the initiating condition occur? (It is acknowledged that any alarm condition can be addressed by an operator response following procedures. But if the condition occurs without being scripted in the exam scenario it can create complexity and confusion that challenge the exam objectives)
6267	Verify the problem statement is correct – the first paragraph seems to imply two cases but it is not clear what the second case is. Is the alarm valid? If the simulator reflects the plant design what is the discrepancy? Provide more information on the impact of this discrepancy on the simulator's capability to implement exam scenarios.
5921	Are there alternate indications the operator would use that have sufficient range to address procedure requirement for isolation? Note: This is another example of where the disposition does not address the simulator capability to support licensing exams.
6154	The discrepancy states that the procedure may not be correct yet the disposition credits the procedure for providing appropriate guidance. Resolve this disconnect. Explain why the graphic issue does not affect operational decisions.
5546	Explain the impact of missing power supplies on the simulator's capability to support license exams
6197	Discrepancy is characterized as occurring with low frequency. Quantify low frequency. How complicated are the recovery actions? How does the loss of communication between WPIS displays and operator stations affect analysis and decision making?
216	The disposition indicates the discrepancy is acceptable because there is a design change tracking it and current documentation states that the behavior is correct. This seems contradictory. Explain how the condition affects the simulator's capability to support license exams.
6019	Are procedures, operator aids, mimics and training consistent with current power supply lineup?
6593	Which loads are not modeled? Which of these loads requires some kind of operator action and what is that action? Do these actions add limitations or significant confusion or complexity to exam scenarios?
6610	Explain why the failure to repower multiple busses is transparent to the operator and why the operator would not notice this condition (these statements come from the disposition paragraph). These statements seem to contradict the general procedure practice to verify automatic actions have occurred. This discrepancy appears to introduce additional workload which adds complexity and potential confusion into the operational analysis and decision making process and thus challenges the ability to administer consistent exam scenarios. If this is not the case please explain why.

