

**From:** Guzman, Richard  
**Sent:** Friday, September 11, 2015 1:28 PM  
**To:** wanda.d.craft@dom.com  
**Subject:** RE: Issuance of Amendment No. 263 Re: TS Chgs to AFW System - MPS3

Wanda,

Thanks for the feedback. The NRC staff technical reviewer has read your comments and recognizes that the first sentence of page 4 may be misleading; however, the intent of the concluding sentence was to convey the staff's acceptance of DNC's RAI response dated January 26, 2015 to the extent that it applied to the existing SR 4.7.1.2.1.b (i.e., prior to amendment approval/implementation). As such, the NRC staff does not consider the noted sentence to be in error; the staff acknowledges and maintains that the intent of the approved amendment is to apply the IST program for AFW pump surveillance acceptance criteria; and the pump speed and performance criteria may be revised as allowed by the IST program (TS 4.0.5).

Therefore, the noted sentence is not intended to have any contradictory impact on the staff's overall conclusion that the replacement of the surveillance frequency and acceptance criteria for AFW pumps with reference via the proposed NOTE to the IST Program (TS 4.0.5) is acceptable.

**Rich Guzman**  
**Sr. Project Manager**  
**NRR/DORL**  
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**301-415-1030**

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**From:** Wanda D Craft (Generation - 6) [<mailto:wanda.d.craft@dom.com>]  
**Sent:** Wednesday, August 26, 2015 4:14 PM  
**To:** Guzman, Richard  
**Subject:** [External\_Sender] Issuance of Amendment No. 263 Re: TS Chgs to AFW System - MPS3

Rich,

As we discussed, during review of Amendment 263 for the MPS3 TS Change to the Aux Feedwater System dated July 28, 2015, DNC noted a sentence on page 4 that may be of concern. The first sentence on page 4 states, "The NRC staff concluded that performing the IST for these pumps instead of the surveillance tests is acceptable because the IST differential pressure reference values bound the pump total head requirements in SR 4.7.1.2.1.b." This statement is true today, however, the intent of the LAR was to use the IST program for AFW pump surveillance acceptance criteria and have the flexibility to revise pump speed and pump performance criteria as allowed by the IST program. The IST program will ensure the pump test acceptance criteria remains bounded by design basis requirements. The concern is that as currently written, the amendment allows moving the details of the testing of the pumps to the IST program but may limit the extent to which the pump acceptance requirements can be modified under the IST program.

DNC has reviewed the LAR and associated RAI. In Attachment 1, Section 3.3 of the LAR, DNC discusses the proposed change relative to control of the pump acceptance criteria: "The proposed change would revise TS SR 4.7.1.2.1.b to remove the surveillance frequency and acceptance criteria for the AFW pumps and reference the IST Program as a basis for the surveillance requirement. The IST Program (TS

4.0.5) will verify the component acceptance criteria, consistent with design basis requirements, and control the frequency of test performance. The acceptance criteria (e.g., developed head, pump flowrate) are based on the design basis requirements. Performance of the required testing will verify proper component operation, and will detect component degradation. The frequency of test performance may change based on equipment performance.” and further states, “The pump acceptance criteria in SRs 4.7.1.2.1.b.1 and 4.7.1.2.1.b.2 would be replaced with a reference to the IST Program.

The pump acceptance criteria specified by design basis requirements is verified by the IST Program, which is referenced (Specification 4.0.5) in the proposed SR 4. 7.1.2.1.b. It is not necessary to specify the acceptance criteria in the surveillance requirement. The IST Program provides sufficient control of this value to ensure the associated pumps will perform as assumed in the accident analysis. Removal of this specific value will not adversely impact test performance. This approach to allow the IST Program to specify the acceptance criteria based on design basis requirements is consistent with NUREG-1431 Rev. 4 (SR 3.7.5.2).”

If you have any questions, please let me know. Thanks.

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