

PMLevyCOLPEm Resource

From: Habib, Donald
Sent: Monday, January 25, 2016 6:34 PM
To: PMLevyCOLPEm Resource
Subject: FW: RE: Question on Flux Doubling Logic Departure

From: Kitchen, Robert H [mailto:Robert.Kitchen@duke-energy.com]
Sent: Monday, January 25, 2016 5:37 PM
To: Habib, Donald <Donald.Habib@nrc.gov>
Subject: [External_Sender] RE: Question on Flux Doubling Logic Departure

Don – I believe that our submittals meet 10CFR52.79(d)(1) requirements cited in your email. The Statements of Consideration for 10CFR52.79 (49388 Federal Register / Vol. 72, No. 166 / Tuesday, August 28, 2007 / Rules and Regulations) state,

“...In addition, paragraph (d) requires that the plant specific PRA information must use the PRA information for the design certification and must be updated to account for site-specific design information and any design changes or departures. In the case where a COL application is referencing a design certification, the NRC only expects the design changes and differences in the modeling (or its uses) pertinent to the PRA information to be addressed to meet the submittal requirement of § 52.79(d)(1). “

The design changes that we have implemented in our COLA do not change the PRA.

From: Habib, Donald [mailto:Donald.Habib@nrc.gov]
Sent: Wednesday, January 20, 2016 1:18 PM
To: Kitchen, Robert H
Cc: Pohida, Marie; Patterson, Malcolm
Subject: Question on Flux Doubling Logic Departure

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Bob –

Below is a question from the staff regarding the Flux Doubling Logic departure that we would like to discuss at a public teleconference.

Don Habib
Levy COL Review, Lead Project Manager
NRO/DNRL, Licensing Branch 4
301-415-1035

10CFR 52.79(d)(1) says “. . . the plant-specific PRA information . . . must be updated to account for site-specific design information and any design changes or departures.” The P-8 permissive is a new function and a departure from the certified design. It prevents a boron dilution event if the flux doubling logic is blocked below the P-8 setpoint.

The staff understands that this new function is not required to mitigate any design basis event. However, the function must be evaluated for risk significance and appropriate treatment (e.g., RTNSS). It may affect the plant-specific PRA and may need to be added to the applicant's reliability assurance program.

Describe the risk significance of this new function and document any changes to risk insights that may be appropriate. Explain whether the function needs to be addressed under RTNSS or included in the reliability assurance program.

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