

NRR-PMDAPem Resource

From: George, Andrea
Sent: Monday, March 21, 2016 7:29 PM
To: 'BBURMEI@entergy.com'
Subject: Request for Additional Information - RBS LAR to Extend Type A and Type C Test Frequencies (NEI 94-01, Rev. 3-A) - TAC No. MF7037
Attachments: MF7037 - RAI.docx
Importance: High

Mr. Burmeister,

By application dated October 29, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15307A293), Entergy Operations, Inc. (Entergy, the licensee), submitted a license amendment request (LAR) for River Bend Station, Unit 1 (RBS). The LAR would revise Technical Specification (TS) 5.5.13, "Primary Containment Leakage Rate Testing Program," to incorporate Nuclear Energy Institute (NEI) topical report 94-01, Revision 3-A, "Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J," which would allow for the extension of the Type A Test (Integrated Leak Rate Test) and Type C Test (Local Leak Rate Test) frequencies from 10 to 15 years and 60 to 75 months, respectively. Surveillance Requirement (SR) 3.6.5.1.3, would also be revised to extend the maximum interval for performing the Drywell Bypass Test from 10 to 15 years in order to synchronize with the proposed extended Type A Test frequency provided for in NEI 94-01, Revision 3-A.

In the course of its review, the U.S. Nuclear Regulatory Commission (NRC) staff has determined that additional information is required in order to complete its evaluation. Please treat this email as the formal transmittal of the request for additional information (RAI), which is attached to this email. As discussed with you on March 21, 2016, the NRC staff would like to have a clarification call regarding this RAI next week. During our call today, it was also agreed that Entergy would respond to this RAI within 30 days, which is April 20, 2016. If you have any issues with responding by this date, please contact me via phone or email.

Sincerely,

Andrea George
Project Manager
Division of Operating Reactor Licensing
U.S. Nuclear Regulatory Commission
301-415-1081

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REQUEST FOR ADDITIONAL INFORMATION

LICENSE AMENDMENT REQUEST TO INCORPORATE NEI 94-01 REVISION 3-A INTO THE
TECHNICAL SPECIFICATIONS TO ALLOW FOR THE EXTENSION OF TYPE A AND TYPE C
TESTING AND TO EXTEND THE FREQUENCY OF DRYWELL BYPASS TESTING

ENTERGY OPERATIONS, INC.

RIVER BEND STATION, UNIT 1

DOCKET NO. 50-458

By application dated October 29, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15307A293), Entergy Operations, Inc. (Entergy, the licensee), submitted a license amendment request (LAR) for River Bend Station, Unit 1 (RBS). The LAR would revise Technical Specification (TS) 5.5.13, "Primary Containment Leakage Rate Testing Program," to incorporate Nuclear Energy Institute (NEI) topical report 94-01, Revision 3-A, "Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J," which would allow for the extension of the Type A Test (Integrated Leak Rate Test, or ILRT) and Type C Test (Local Leak Rate Test) frequencies from 10 to 15 years and 60 to 75 months, respectively. Surveillance Requirement (SR) 3.6.5.1.3, would also be revised to extend the maximum interval for performing the Drywell Bypass Test from 10 to 15 years in order to remain consistent with the proposed extended Type A Test frequency provided for in NEI 94-01 Revision 3-A.

The U.S. Nuclear Regulatory Commission (NRC) staff has determined that additional information is required in order to complete its review of the LAR.

SCVB RAI-1

In Attachment 1, Section 2 of its LAR, the licensee states that the purpose of the proposed change is to allow for the extension of the Type A Test (ILRT) frequency from 10 to 15 years. The proposed new TS 5.5.13 reads:

A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with NEI 94-01, Revision 3-A, "Industry Guidelines for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J," July 2012.

NEI 94-01, Revision 2-A (ADAMS Accession No. ML100620847), incorporated the NRC staff's corresponding Safety Evaluation Report (SER), which included a list of limitations and conditions to be satisfied by licensees proposing to use that topical report to extend the ILRT frequency. The subsequent revision of the topical report, NEI 94-01, Revision 3-A, referred to the previous Revision 2-A in a historical discussion context, but did not incorporate the limitations and conditions listed in the NRC SER for Revision 2-A. In a letter dated August 20,

Enclosure

2013 (ADAMS Accession No. ML13192A394), the NRC staff informed NEI that any licensee submissions referencing NEI 94-01, Revision 3-A will require requests for additional information to address the limitations and conditions in the NRC SER for NEI 94-01, Revision 2-A. In other words, a reference to NEI 94-01, Revision 3-A by itself would not be a sufficient TS reference to a guidance document by for allowing an extension to the Type A Test frequency to 15 years.

Please describe how, without referencing the limitations and conditions from NEI 94-01 Revision 2-A in the TS, a reference to NEI 94-01, Revision 3-A, would be sufficient to support the extension of the Type A test frequency.

SCVB RAI-2

In its LAR, the licensee proposes to revise the Note in SR 3.6.5.1.3 to state that “SR 3.0.2 is not applicable for extensions > 9 months.” In its LAR, the licensee states that the request to extend the Drywell Bypass Test frequency from 10 to 15 years is in large part to align it with performance of the ILRT (i.e., perform both tests in the same refueling outage) in order to reduce costs and radiological dose. The risk evaluation provided in the LAR assumes both the Drywell Bypass Test and the ILRT are performed on a 15 year interval, further indicating that both tests would be performed during the same timeframe. The NEI 94-01, Revision 2-A, NRC staff SER limitations and conditions include a provision that the 15-year Type A Test interval only be exceeded upon demonstration to the NRC staff that exceeding the 15 year interval is due to an unforeseen emergent condition.

Please provide justification as to why SR 3.6.5.1.3 retains an extension option for the proposed 180-month Drywell Bypass Test frequency, which is not subject to the same condition as that of the corresponding ILRT frequency, as discussed above.