NRR-PMDAPEm Resource

From: Wyman, Stephen
Sent: Wednesday, April 08, 2015 1:08 PM
To: 'John.Fields@exnuclear.com'
Cc: DiFrancesco, Nicholas
Subject: Monticello ESEP Report Clarifications

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Mr. Fields,

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

1. Please clarify if the RCIC CST suction valve should be included in the ESEP scope or discuss why it is not necessary.

2. The ESEP submittal identifies the Residual Heat Removal Service Water System as a flow-path for Phase 2 Core Cooling; however, it appears that the ESEL does not contain components within this flow-path, except for the passive RHR system heat exchangers. 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 identified 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.

3. In attachment A, the ESEL, there are a large number of items that have blank operating states and note/comment. Please update the table with the appropriate information.

4. 8 relays in the ESEL are identified as “bad actors”, and are assigned a functional HCLPF capacity = 0.0. Of the 18 remaining relays, 17 relays are designated with a HCLPF capacity = 0.21g, based on the anchorage capacity of the parent (i.e., rule of the box). For these 17 relays, identify the functional HCLPF capacities, and also discuss how in-cabinet amplification was considered in determining the functional capacity for each relay.

5. 12 switches in the ESEL are identified as “No public capacity data available for this item.” and are assigned a HCLPF capacity = 0.0. Of the remaining 37 switches, 35 switches apparently have a HCLPF capacity controlled by something other than function. For these 35 switches, identify the functional HCLPF capacities, and also discuss how in-cabinet amplification was considered in determining the functional capacity for each switch.

6. There are approximately 50 ESEL items identified as inaccessible because they are inside the drywell. The licensee does NOT intend to complete a walk-by or remote visual of the inaccessible ESEL items at a later date. It is relying on A-46 walkdown results, which are around 20 years old. This appears to

be inconsistent with the augmented approach proposed by EPRI and accepted by NRC. Discuss the technical basis why these approximately 50 items do not need to be looked at, in order to verify condition and re-affirm the A-46 walkdown results.

7. Section 8.2 identifies 24 ESEL components that have a HCLPF capacity less than the RLGM; 23 are relays and switches. A more detailed analysis of capacity for the RHR Heat Exchanger E-200B anchorage, and changing the bolting material are discussed as options, but have not been implemented. 20 of the 23 relays and switches lack adequate qualification test data. Several avenues for resolution are discussed, but none have been implemented.

   In Section 8.4, the Licensee indicates that the 24 components are entered into the plant Corrective Actions Program (CAP) for resolution. The analysis and completion of the 24 components should have been part of the submittal. There are no regulatory commitments made in the ESEP submittal. Discuss the status of the resolution for each of the 24 components, including the method being employed, the schedule for completing the resolution activities, and the schedule for implementing any required hardware modifications. Also discuss the technical basis for relying on the plant CAP for resolution, in lieu of including regulatory commitments in the ESEP submittal, consistent with the EPRI Augmented Approach 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

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