

NRR-PMDAPem Resource

From: Galvin, Dennis
Sent: Tuesday, July 26, 2016 1:41 PM
To: Pilo, Tony
Cc: Orf, Tracy; Hardgrove, Matthew; Vu, Hang
Subject: Robinson Draft RAIs for LAR Regarding TSTF-339 – Relocate TS Parameters to the COLR (MF7615)
Attachments: Robinson TSTF-339 LAR Draft RAI MF7615.pdf

Subject: H. B. Robinson Steam Electric Plant Unit No. 2 – Request For Additional Information Regarding License Amendment Request To Adopt Technical Specifications Task Force-339, Revision 2, “Relocate TS Parameters to the COLR,” consistent with WCAP-14483, Revision 2, “Generic Methodology for Expanded Core Operating Limits Report.” (CAC No. MF7615)

Tony,

By letter dated April 24, 2016 (Agencywide Document Access and Management System (ADAMS) Accession Number ML16116A033), Duke Energy Progress (DEP), Inc., the licensee submitted a license amendment request for H. B. Robinson Steam Electric Plant, Unit No. 2. The proposed amendment would adopt Technical Specifications Task Force (TSTF)-339, Revision 2, “Relocate TS Parameters to the COLR,” consistent with WCAP-14483, Revision 2, “Generic Methodology for Expanded Core Operating Limits Report.” Based on TSTF-339, the proposed amendment would relocate reactor coolant system related cycle-specific parameters and core safety limits from the technical specifications (TS) to the Core Operating Limits Report (COLR). The U.S. Nuclear Regulatory Commission (NRC) staff has determined that additional information is needed to complete its review related to reactor systems. Please see the attached requests for additional information (RAIs) in DRAFT form.

A Sensitive Unclassified Non-Safeguards Information (SUNSI) review was completed by the staff on the draft RAIs and the staff concluded the RAIs do not contain SUNSI. If you find any information needs to be withheld from the public, please notify me within 5 days of receipt of this email.

Please submit your response to these RAIs within 30 days of this email. If you need a clarification call for the attached draft RAIs, or you need to change the RAI response due date, please contact me at (301) 415-6256.

Respectfully,

Dennis Galvin
Project Manager
U.S Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Division of Operating Reactor Licensing
Licensing Project Branch 2-2
301-415-6256

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DRAFT REQUEST FOR ADDITIONAL INFORMATION

REGARDING LICENSE AMENDMENT REQUEST TO ADOPT TECHNICAL SPECIFICATIONS

TASK FORCE (TSTF)-339, REVISION 2, "RELOCATE TS PARAMETERS TO THE COLR,"

CONSISTENT WITH WCAP-14483, REVISION 2,

"GENERIC METHODOLOGY FOR EXPANDED CORE OPERATING LIMITS REPORT"

DUKE ENERGY PROGRESS, INC.

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2

DOCKET NO. 50-261

By letter dated April 24, 2016 (Agencywide Document Access and Management System (ADAMS) Accession Number ML16116A033), Duke Energy Progress (DEP), Inc., the licensee, for H. B. Robinson Steam Electric Plant, Unit No. 2 (HBRSEP2), requested an amendment to the Technical Specifications (TS). The proposed amendment would adopt Technical Specifications Task Force (TSTF)-339, Revision 2, "Relocate TS Parameters to The COLR," dated May 26, 2000 (ADAMS Accession No. ML003723269), consistent with WCAP-14483, Revision 2, "Generic Methodology for Expanded Core Operating Limits Report," dated January 19, 1999 (ADAMS Accession No. ML003723269). The proposed amendment would relocate reactor coolant system (RCS) related cycle-specific parameters and core safety limits from the technical specifications (TS) to the Core Operating Limits Report (COLR).

Based on the U.S. Nuclear Regulatory Commission (NRC) staff's review of the license amendment request (LAR), the Reactor Systems Branch (SRXB) and the Instrumentation and Control Branch (EICB) have determined that additional information regarding is required to complete their review.

SRXB – RAI 1

The licensee states in its application that the Limiting Condition for Operation (LCO) and Surveillance values in TS 3.4.1, "RCS Pressure, Temperature, and Flow Departure from Nucleate Boiling (DNB) Limits," for RCS pressure and temperature do not currently account for instrument uncertainty and are therefore non-conservative. The LCO and surveillance values for RCS flow do account for instrument uncertainty. Administrative controls were implemented in accordance with the guidance in NRC Administrative Letter 98-10, "Dispositioning of Technical Specifications That Are Insufficient to Assure Plant Safety," dated December 19, 1998. These administrative controls were implemented to utilize conservative limits for RCS pressure and temperature that do account for instrument uncertainty. The licensee states it intends to incorporate RCS pressure and temperature LCO and surveillance values, which do account for instrument uncertainty, into the COLR as part of the implementation of the proposed amendment. It is unclear to the NRC staff what the uncertainty values are associated with the LCO and Surveillances for TS 3.4.1 for RCS pressure and temperature. In order to ensure that conservatism is preserved, the NRC staff requests that the licensee provide a discussion of the uncertainty values and their magnitudes for RCS pressure and temperature limits in TS 3.4.1.

SRXB – RAI 2

10 CFR 50.36(b) states in part, “the technical specifications will be derived from the analyses and evaluation included in the safety analysis report, and amendments thereto, submitted pursuant to § 50.34.”

The application provided by the licensee did not state whether the safety analyses for the RCS pressure and temperature needed to be revised for the proposed amendment. The NRC staff requests that the licensee confirm if reanalysis was performed or if the current analysis remains bounding to support these new values for RCS pressure and temperature that are being relocated to the COLR for effects to the Updated Final Safety Analysis Report (UFSAR) Chapter 15 safety analyses.

EICB – RAI 1

TSTF-339 identifies WCAP-14483-A as the methodology that will be used to relocate TS parameters to COLR. WCAP-14483-A, Section 3.0, “Relocation of the OTDT and OPDT Setpoint Parameter Values to the COLR,” provides the basis for Overtemperature ΔT (OTDT) and Overpower ΔT (OPDT) setpoints, including typical setpoint equations, and the basis for moving the OTDT and OPDT TS parameters to a COLR. WCAP-14483-A, Appendix B, “Sample COLR Revisions,” provides a sample COLR revision for reactor trip system instrumentation setpoints and departure from nucleate boiling parameters.

The licensee proposed to revise the TS Table 3.3.1-1, “Reactor Protection System Instruments,” by relocating the numerical values of the Note 1 (Overtemperature ΔT) and Note 2 (Overpower ΔT) to the COLR and adding the notes. The proposed notes state “The values denoted with [*] are specified in the COLR.” However, the HBRSEP2 TS OTDT and OPDT equations differs from those in TSTF-399 and WCAP-14483-A and thus have somewhat different OTDT and OPDT TS parameters. Thus the sample COLR revision in WCAP-14483-A, Appendix B is not fully applicable to the proposed HBRSEP2 TS change. In addition, the licensee did not specify how the changes would appear in the proposed COLR. Therefore, the NRC staff requests that the licensee provide a copy of the proposed COLR that shows changes resulting from the LAR.