

NRR-PMDAPem Resource

From: Galvin, Dennis
Sent: Thursday, August 11, 2016 10:29 AM
To: Pilo, Tony
Cc: Wild, Justin Michael; Hardgrove, Matthew; Vu, Hang; Orf, Tracy; Oesterle, Eric; Waters, Michael
Subject: Robinson TSTF-339 RAIs (MF7615)
Attachments: Robinson TSTF-339 Final RAIs 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 (LAR) for H. B. Robinson Steam Electric Plant, Unit No. 2. This LAR 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 LAR 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. The enclosed requests for additional information (RAIs) were e-mailed to the licensee in draft form on July 26, 2016, (ADAMS Accession No. ML16208A425). The licensee has agreed to provide the responses to these RAIs by September 9, 2016. The NRC staff agrees with this date.

If you have any questions, 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-339 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 license provide pages of the proposed COLR that show changes resulting from the LAR.