

Official Transcript of Proceedings
NUCLEAR REGULATORY COMMISSION

Title: Advisory Committee on Reactor Safeguards
 APR 1400 Subcommittee Meeting

Docket Number: (n/a)

Location: Rockville, Maryland

Date: Thursday, September 22, 2016

Work Order No.: NRC-2629

Pages 1-71

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ADVISORY COMMITTEE ON REACTOR SAFEGUARDS

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ADVISORY COMMITTEE ON REACTOR SAFEGUARDS

(ACRS)

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APR1400 SUBCOMMITTEE

+ + + + +

THURSDAY

SEPTEMBER 22, 2016

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ROCKVILLE, MARYLAND

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The Subcommittee met at the Nuclear
Regulatory Commission, Two White Flint North, Room
T2B1, 11545 Rockville Pike, at 8:30 a.m., Ronald G.
Ballinger, Chairman, presiding.

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COMMITTEE MEMBERS:

RONALD G. BALLINGER, Chairman

CHARLES H. BROWN, JR., Member

JOSE A. MARCH-LEUBA, Member

DANA A. POWERS, Member

JOY REMPE, Member

PETER C. RICCARDELLA, Member

JOHN W. STETKAR, Chairman

MATTHEW W. SUNSERI, Member

DESIGNATED FEDERAL OFFICIAL:

CHRISTOPHER L. BROWN

ALSO PRESENT:

TONY AHN, KHNP

MAITRI BANNERJEE, NRR*

JOHN BUDZYNSKI, NRO

BOB CALDWELL, NRO

SEOG NAM CHOI, KHNP

WOOCHONG CHON, KEPCO NF

JEFF CIOCCO, NRO

TIM DRZEWIECKI, NRO

SONG DUK BIN, KEPCO E&C

GORDON HALL, Westinghouse

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JOHN HONCHARICK, NRO
JASON HUANG, NRO
GYUN DO JEONG, KHNP
REBECCA KARAS, NRO
JONG SOO KIM, KHNP
JUNGHO KIM, KHNP
MINSEOK KIM, KHNP
YUN HO KIM, KHNP
LIM KWANGIL, KEPCO E&C
SUNGUOK KWON, KHNP
HIEU LE, NRO
CHANG-YANG LI, NRO
GREG MAKAR, NRO
RYAN NOLAN, NRO
JIYONG OH, KHNP
ERIC REICHELT, NRO
JAMES ROSS, KHNP/AECOM
ROB SISK, Westinghouse
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ANGELO STUBBS, NRO
JEONG KWAN SUCH, KHNP
YOUNG SIL SUL, KEPCO E&C
JESSICA UMANA, NRO
DAN WIDREVITZ, NRO
SEOK JEONG YUNE, KEPCO E&C

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* Present via telephone

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P R O C E E D I N G S

8:35 a.m.

1
2
3 CHAIRMAN BALLINGER: This meeting will
4 come to order. This is a meeting of the -- a
5 renewed meeting of the APR1400 Committee of Advisory
6 Committee of Reactor Safeguards. I'm Ron Ballinger,
7 Chairman of the Committee. Members in attendance
8 are Joy Rempe, Charlie Brown, Jose March-Leuba, John
9 Stetkar, Matt Sunseri, Dana Powers and Peter
10 Riccardella.

11 The purpose of today's meeting is an
12 extension of yesterday's meeting to receive
13 briefings from KHNP regarding -- and the staff
14 regarding the design certification for the APR1400.
15 The rules for today's meeting again were published
16 in the *Federal Register* on September 7, 2016. The
17 meeting was announced as an open and closed meeting,
18 so if we have questions that turn out to be
19 proprietary, you need to let us know so we can close
20 the meeting.

21 A transcript is being kept and made
22 available in the *Federal Register*, as stated in the
23 *Federal Register* notice. We would request that
24 people shut off or disable chicken sounds and stuff
25 like that various cell phones and other items that

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1 we've heard already this morning.

2 Participants should first identify
3 themselves when they have comments, and speak with
4 sufficient clarity and volume so that they can be
5 readily heard. We have a bridge line open I think
6 again, and before we get started, I want to make
7 some clarifications of yesterday.

8 This is a subcommittee meeting, which
9 means that questions from members are questions from
10 the subcommittee members themselves. They're not
11 questions from the ACRS. The ACRS communicates
12 through its letters only.

13 So while we have kept a list of
14 questions and we've gotten asked questions where the
15 applicant or the staff may say we'll get back to you
16 because we need to get an answer, that is not an RAI
17 all right, definitely.

18 Not an RAI, and so we'll adjudicate
19 those questions amongst the staff and things like
20 that. So that's to be very, very clear about that
21 and I think that's clear under Member Stetkar wants
22 to say something in addition.

23 MEMBER STETKAR: No, that's pretty
24 clear.

25 CHAIRMAN BALLINGER: So with that, does

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1 -- you want to say something Bill or Jeff?

2 MR. CIOCCO: Jeff Ciocco. I'm the
3 lead project manager for the APR1400 design
4 certification project. Thank you for having us back
5 this morning. We look forward to giving you our
6 staff presentation on Chapter 5. We have everybody
7 assembled up here at the table. Over here, we had
8 good representation by our technical staff in the
9 audience, as well as our technical branch chiefs,
10 and we have a division director with us as well
11 today from the Division of Engineering, Bob
12 Caldwell.

13 So we look forward to giving you our
14 presentation, any questions that you have, thank
15 you.

16 CHAIRMAN BALLINGER: And so who's up?
17 Jessica.

18 MS. UMANA: Okay. Good morning. I'm
19 Jessica Umana. I'm the Chapter 5 Project Manager
20 for APR1400. Today, you will hear the staff's
21 presentation to ACRS on reactor, I'm sorry, reactor
22 coolant system and related systems. Specifically,
23 the staff will cover technical topics and open items
24 that came up fast in our review, which was captured
25 in the safety evaluation which you received some

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1 time prior to this meeting.

2 I'd like to take this opportunity today
3 to just present the presenters. We have John
4 Budzynski, Dan Widrevitz, John Honcharik and Greg
5 Makar. Let me move on through the slides. While
6 you see the presenters up here, I do want to take a
7 moment to appreciate this item. The next is the
8 entire staff that worked on Chapter 5.

9 On this slide, we have it over on this
10 one and I believe the next two slides we an overview
11 of the SRP sections that were reviewed and the
12 number of questions that were generated from each
13 section with open items. There is one correction
14 I'd like to make, and that's on this slide.

15 This one shows that we have one open
16 item in 5.4, but that open item is actually in
17 Section 5.4.1.2. The confusion was on my part based
18 on the numbering scheme that was produced when the
19 RAI went out. But I do want to make that
20 clarification. It's not in 5.4. It's 5.4.1.2.

21 I believe here we have a summary.
22 Overall, 77 questions were generated in Chapter 5,
23 and we have 13 open items. I think maybe one or two
24 may have been brought to resolution since this
25 presentation was prepared by the -- I'll let the

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1 staff cover that.

2 So as you can see here, go back a few
3 slides. A number of questions were generated in
4 5.4.1.1, which is the Reactor Coolant Pump Flywheel,
5 and then we had a few questions come from 5.2.3.
6 So now we'll turn it over to John Budzynski. He's
7 going to be presenting in 5.2.2, which is
8 Overpressure Protection, 5.4.1.2, Reactor Coolant
9 Pumps, 5.4.7, Shutdown Cooling, 5.4.12, Reactor
10 Coolant System High-Point Vents.

11 MR. BUDZYNSKI: Okay. The first
12 section we're going to hear is Section 5.2.2,
13 Overpressure Protection System. The main primary
14 reason for the overprotection is to protect the
15 reactor cooling system, connecting systems and
16 secondary sides of steam generators.

17 The reactor cooling of the pressure
18 boundary is consistent with four POS RVs, two
19 shutdown cooling relief valves and 20 main steam
20 safety valves, five per steam line and the shutdown
21 cooling suction line relief valve provides
22 sufficient pressure, relief capacity to indicate the
23 most, the main low pressure overprotection event.

24 Let's go on to the next slide. In the
25 there open items, two have been since closed. The

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1 only remaining open item is the second one, 5.2.2.7
2 and we requested additional information on how they
3 determine the methodology in what computer codes
4 they used, and then put parameters in the
5 assumptions being made in the analysis for a
6 limiting LTOP event.

7 MEMBER STETKAR: John, I had a question
8 about that, juts for my edification. When I read
9 through that section of SER, I know you're concerned
10 about energy input from the secondary to the primary
11 system. Is that what --

12 MR. BUDZYNSKI: Yes.

13 MEMBER STETKAR: It's noted. It says
14 "The applicant did provide information on the
15 secondary to primary heat transfer using the
16 secondary temperature 230 degrees Fahrenheit, 110
17 degrees C greater than the RCS, which the staff
18 concludes is substantially more conservative than
19 the 100 degrees Fahrenheit, 37 degrees C difference
20 allowed by the technical specifications, and is
21 therefore acceptably conservative."

22 How come we have a situation where the
23 secondary temperature is at 230 degrees Fahrenheit
24 higher than the primary temperature under conditions
25 when LTOP is required, and I don't -- because

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1 yesterday I couldn't ascertain whether or not the
2 actual enable temperature was proprietary. So we
3 all know what it is but --

4 MR. BUDZYNSKI: I would have to say
5 that the gentleman that wrote this RAI is not
6 present, and he is the gentleman that's familiar
7 with this RAI. I would have to go back and discuss
8 it with him --

9 MEMBER STETKAR: Because that -- see,
10 that's a really big delta T --

11 MR. BUDZYNSKI: Yes, it is.

12 MEMBER STETKAR: And I'm not a thermal
13 hydraulics guy, but I sort of know where water boils
14 under what different pressures and how heat transfer
15 normally works.

16 So it's really hard for me -- when you
17 say it's acceptably conservative, if it's -- if it's
18 absurd, that isn't what we ought to be doing either.
19 So if you could help me with that somehow, you know,
20 just put it on -- it's on the transcript and as Ron
21 said it's just a question.

22 MR. BUDZYNSKI: Okay.

23 MS. KARAS: This is Becky Karas.

24 MEMBER STETKAR: It's only -- I'd hate
25 to see applicants doing analyses with just

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1 artificial conditions, and then somebody saying well
2 that's acceptably conservative.

3 MS. KARAS: This is Becky Karas, chief
4 of Reactor Systems. I can try and get the reviewer
5 down here.

6 MEMBER STETKAR: Oh, it would help if
7 it's a quick answer, you know. If it isn't, then
8 we're going to be meeting on these things.

9 MS. KARAS: Okay, okay, all right.

10 MEMBER STETKAR: It isn't -- it doesn't
11 necessarily have to be answered, you know,
12 immediately if the cognizant person isn't here.

13 MS. KARAS: Yeah. I can try and get him
14 down here during this meeting, okay.

15 MEMBER STETKAR: Thank you.

16 MS. KARAS: Okay.

17 MR. BUDZYNSKI: The next section
18 5.4.1.2, Reactor Coolant Pumps. The pump design is
19 -- the reactor coolant pump is a vertical shaft,
20 single stage centrifugal pump. Loss of cooling
21 water event is the most serious one. CCW flows to
22 the pump motor bearing old cores, motor air coolers,
23 high pressure seal water coolers pump and the CVCS
24 continues to provide sealed water injection flow to
25 the RCP pump by seals.

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1 Pump and motor bearings designed to
2 withstand the loss of CCW for 30 minutes. CCW,
3 that's Division 1, supports charging pump new flow
4 heat exchanger and CVCS and all coolers under RCPS.
5 The seal design is improved to have low seal leakage
6 rates during a station blackout event.

7 Two open items that have since been
8 closed and resolved so we won't discuss it here.

9 MEMBER STETKAR: I had, John, a question
10 on the overspeed for the flywheel, and I hit you
11 with it because I beat up the applicant enough
12 yesterday. When I read their section of the DCD,
13 they're very, very, very careful in the DCD to say
14 that the highest anticipated overspeed is predicted
15 for a loss of coolant accident, with the largest
16 break size remaining after the application of leak
17 before break.

18 That break size is apparently four
19 inches, okay. There's a lot of much bigger piping
20 connections to the reactor coolant system than four
21 inches. How do I treat -- I mean does the staff
22 accept leak before break arguments in terms of LOCA
23 sizes for this type of analysis? What happens if I
24 get like a 12 inch break? Does the flywheel come
25 apart? That's my concern.

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1 (Off mic comments.)

2 MR. HONCHARIK: I guess this is John
3 Honcharik. So I guess the question is whether or
4 not that four inch line is the limiting line?

5 MEMBER STETKAR: They claim it's the
6 limiting line after they apply all of their leak
7 before break stuff. In other words, whatever -- I
8 haven't read Chapters 3.6.3, nor am I a specialist
9 in leak before break analyses because that's always
10 mystified me. But apparently after you do your leak
11 before analyses, they conclude that the largest
12 break equivalent size that they can get after all of
13 that is four inches, and they did their overspeed
14 analysis based on a four inch break is my
15 understanding.

16 It said based on that four inch break, I
17 won't exceed my design overspeed of the pump, and my
18 question is well, you know, the loops themselves are
19 really big and I don't want to get into the double
20 ambiguity and sheer of the loop, and there's
21 pressurize the surge line it's 12 inches.

22 The direct vessel injection lines are
23 like eight or eight and a half inches. Couldn't
24 find the charging and letdown lines sizes, but
25 they're probably, you know, in the four inch or so

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1 range. What happens if they get a bigger break,
2 you know? Essentially you've accepted their
3 overspeed analysis as being acceptable.

4 What I don't know is if they have a
5 bigger break, can they get a larger overspeed and
6 have the flywheel come apart?

7 MR. HONCHARIK: Yeah, because I looked
8 at the flywheel and I know, I mean I know they -- I
9 think they -- I'm sure they did leak before break as
10 you stated, and basically there, instead of having a
11 break you'll have a leak. So more than likely
12 those, what they're saying then is that those larger
13 pipe sizes more than likely will have a leak, not a
14 break.

15 So some of the limiting ones would be
16 the other ones, and I think the largest that they
17 specified was four inches. But I'd have to consult
18 with someone for the leak before break.

19 MEMBER STETKAR: Yeah, and indeed that's
20 what they say they did. But what I'm curious about
21 -- and I don't know how that factors into design
22 basis LOCA analyses. That's a different topic. I'm
23 just saying for the purposes of evaluating the
24 integrity of the flywheel or an overspeed is does
25 the staff typically accept those types of leak

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1 before break arguments.

2 I'm not sure that I've seen that before
3 in other applications, but I must admit that I
4 didn't go back and try to do a thorough search of
5 Chapter 5 to see how people did those overspeed
6 analyses.

7 MR. MITCHELL: Yeah, and this -- if I
8 could interject. This is Matthew Mitchell, Chief of
9 the Materials and Chemical Engineering Branch in
10 NRO. I believe the characterization with respect to
11 the span of systems which on occasion be applied a
12 leak before Break 2 is accurate and that they did
13 eliminate from a leak before break analysis
14 perspective lines down to -- essentially into the
15 forward trench.

16 I think you will find that in 363 when
17 we get to covering that. From a philosophical
18 standpoint, in terms of the application of leak
19 before break technology, I think the staff should
20 probably take this back and discuss this.

21 MEMBER STETKAR: I was more -- the
22 reason I asked you rather than KHNP is that they
23 have used the leak before break argument in a few
24 places throughout the DCD, and to me this is, you
25 know, it's partly technical, it's partly

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1 philosophical. Because you've -- this is first
2 place where I could hang my hat on something that
3 the applicant has explicitly said they've accounted
4 for, it's why I'm kind of raising it now in terms of
5 what's the staff's philosophy in accounting for
6 those arguments.

7 MR. MITCHELL: And I completely
8 understand the question. I'm sure, as you will
9 recollect, leak before break has inherently been
10 tied to general design criterion 4, and the
11 elimination of the dynamic effects of pipe rupture.

12 MEMBER STETKAR: Exactly.

13 MR. MITCHELL: And that has since the
14 initiation of the leak before break concept been a
15 rather well-defined regulatory box in terms of the
16 type of effects, jet impingement, pipe whip, that
17 could be essentially excluded from the design basis
18 based upon the demonstration of leak before break.

19 MEMBER STETKAR: Yes.

20 MR. MITCHELL: Having done leak before
21 break analyses myself for many, many years, back
22 when I was in the other office and then my branch
23 deals with LBB now, I will say that I'm not familiar
24 with a prior application that I can recall where it
25 would have been associated with flywheel overspeed.

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1 I'd need to go back and research that a bit more to
2 see whether or not that was ever established by
3 precedent. But that would be within the scope of
4 dynamic effects of pipe rupture.

5 MEMBER STETKAR: Yeah. I didn't, as I
6 said, I didn't try to go back to the other DCDs
7 that I have and track it, only because I ran out of
8 time. But I didn't recall hearing it and I've sat
9 in on several of the design certifications over the
10 last seven-eight years or so, and I didn't recall
11 hearing that type of argument before.

12 MR. MITCHELL: And I think I would agree
13 that we probably want to go back and discuss it
14 amongst ourselves a little bit more because I,
15 likewise I'm not sure whether I've run across that.

16 MEMBER STETKAR: Yeah. Okay, thank you.

17 MS. KARAS: Dr. Stetkar, at whatever
18 point you want to return to your prior question, we
19 have the reviewer here for that.

20 MEMBER STETKAR: I'm pretty thrilled
21 right now before I forget what it was.

22 MS. KARAS: If you could possibly
23 restate your question, it would be helpful.

24 MEMBER STETKAR: Oh gee. Well, now
25 we're really pressing. Let me go back to where the

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1 heck it was.

2 CHAIRMAN BALLINGER: Oh, the temperature
3 on the --

4 MEMBER STETKAR: No. In all
5 seriousness, the concern as I understand it for the
6 energy and for the low temperature overpressure
7 protection analysis was concerning with heat
8 transfer from the secondary side to the primary
9 side, energy transfer from the secondary side --
10 there you are -- to the primary side.

11 In the SER, there's a statement that
12 said you're still tracking that as an open item. We
13 know that. So the applicant did provide information
14 on the secondary to primary heat transfer using the
15 secondary temperature of 230 degrees Fahrenheit, 110
16 degrees C greater than the RCS, which the staff
17 concludes is substantially more conservative than
18 the 100 degrees Fahrenheit, 37 degrees C difference
19 allowed by the technical specifications, and is
20 therefore acceptable and conservative.

21 My question was for your benefit,
22 because you may not have been here, I don't know
23 whether the LTOP enable and disable temperatures
24 are proprietary information, so I didn't cite those
25 temperatures. We all know what they are. But given

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1 the enable temperature, is it feasible at all to
2 have a secondary temperature 230 degrees higher than
3 that temperature? In other words, how does thermal
4 dynamics work in this situation?

5 MR. DRZEWIECKI: So there's another
6 event, I'm sorry. Is this in?

7 MEMBER STETKAR: Well, I think so, yeah.

8 MR. DRZEWIECKI: It's on, okay. I'm Tim
9 Drzewiecki. I'm from the Systems Branch. We also
10 looked at this in an event in Chapter 15 as well, in
11 which we were looking at some of the overpressure
12 events there. As far as that specific answer to
13 your question, I don't it my fingertips. I can
14 follow up on that.

15 It was addressed in an RAI because
16 actually the event that I'm thinking of is a
17 startup. It's a startup of an RCP in a random loop.
18 So we asked an RAI on that, trying to get the basis
19 for where those values are from. I can follow up
20 with that RAI value there, but it's addressed as
21 well in Chapter 15. I forget the event number.

22 However, as far as the tracking of this
23 RAI and why it's an open item, it is that we were
24 not clear on how the calculation was actually done,
25 some of the other inputs and things like that.

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1 That's why it's being tracked as an open item.

2 MEMBER STETKAR: My question when I
3 stumbled across the actual temperature was, you
4 know, I understand having confidence that you, that
5 the staff must understand how the applicant did
6 their analyses. That's clear. There's no question
7 about that, and it's also clear that the analysis
8 should be appropriately conservative.

9 But it shouldn't necessarily be
10 unrealistic in the sense of you can't achieve these
11 conditions. In other words, just saying that, you
12 know, I could pick a 1,000 degree temperature
13 difference and that would be even more conservative,
14 but we all know that's physically impossible.

15 So I was just questioning, you know,
16 what basis. Are there conditions where you could
17 get that type of delta T in that direction at the
18 time when you need LTOP. It's clear there are other
19 conditions where maybe you could get that type of
20 delta T during a cooldown, while the secondary and
21 the primary system is still intact, but now when
22 you're below the -- as cold as you are when you get
23 the LTOP enable or even the disable temperature.

24 MR. DRZEWIECKI: Yes, I understand that.

25 MEMBER STETKAR: Because you're talking

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1 about a few hundred degrees on the secondary side.

2 MR. DRZEWIECKI: Yeah, yeah. So as far
3 as the details, I'm sorry, I don't have it at my
4 fingertips.

5 MEMBER STETKAR: No, that's fine.

6 MR. DRZEWIECKI: But it was definitely
7 addressed in the section that's within 15 on the
8 startup --

9 MEMBER STETKAR: On the startup of the
10 pump.

11 MR. DRZEWIECKI: Yeah.

12 MEMBER STETKAR: Okay, because that
13 again, that might have been. I don't want to
14 speculate. I didn't go over in Chapter 15 and try
15 to draw this. I just found it Chapter 5.

16 MR. DRZEWIECKI: Yeah, okay.

17 MEMBER STETKAR: Okay.

18 MR. DRZEWIECKI: Thank you.

19 MEMBER STETKAR: Thank you.

20 MEMBER REMPE: Excuse me while you're
21 still there. I'm a little confused on what it is
22 you're still investigating, because what's in the
23 draft DIC says well, the inputs are conservative and
24 I thought I heard today that it's not the inputs
25 anymore; it's just the methodology you're concerned

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1 about at this point or what is it?

2 MR. DRZEWIECKI: So as far as the
3 language that the inputs, we found them to be --
4 conservative and acceptable. I really can't speak
5 to that. I don't know if Gordon wrote that.
6 However, the one thing that I will say is as far as
7 the methods and the actual calculation that was
8 done, that's what we have questions on.

9 MEMBER REMPE: So this is that it was
10 the code. It starts with an O, OBERP, O-B-E-R-P is
11 the name of the code that was used, right?

12 MR. DRZEWIECKI: It could be.

13 MEMBER REMPE: Okay, but that -- okay.
14 So I was just looking at the RAI and the response
15 back, and I was just kind of curious on what was the
16 problem. But I guess we'll hear about it later.

17 MR. DRZEWIECKI: Okay. Just their
18 response to that was the 5.2.2.7 follow-up, because
19 that would be the one that's still on the
20 evaluation.

21 MEMBER REMPE: Right.

22 MR. DRZEWIECKI: Okay.

23 MEMBER REMPE: But there's two parts to
24 it, and I assume that the hand calculations aren't
25 causing the problems when you're talking about the

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1 methods, because that usually isn't a problem with a
2 hand calculation. But the energy, the second one
3 talks about the method of analysis. But anyway, I
4 just am curious about it. But I guess we'll get an
5 update and we'll hear about it later is the answer
6 to the question at this point.

7 MR. DRZEWIECKI: Yes.

8 MEMBER REMPE: Thank you.

9 MR. BUDZYNSKI: Okay. We're on 5.4.7,
10 Shutdown Cooling. Configuration similar to most
11 current PWR designs. Two independent trains.
12 Shutdown cooling pumps are interchangeable with the
13 containment spray pumps. So this is used during
14 shutdown, refueling, startup and it's used in the
15 range of approximately below 450 psig and 350
16 degrees Fahrenheit.

17 When we did the evaluation of gas
18 accumulation, we used Generic Letter 2008, RIS 2013-
19 09 and we evaluated it also against NEI 09-10. We
20 have one open item. We accepted the ITAAC that they
21 wrote, but the only problem we have is that the NEI
22 09-10 was not referenced in the DCD, and we wanted
23 it to be referenced in the DCD because it -- more or
24 less it's the most current gas management procedure
25 we have, guidance we have.

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1 It takes into consideration void testing
2 and it takes into consideration of a gas
3 accumulation high point sections of the piping
4 configuration, and it's all put together one piece
5 and we wanted that to be referenced. As far as the
6 ITAAC, it was acceptable and we can close that out
7 within -- once we get together with the applicant.

8 MEMBER REMPE: So I have a question
9 about the section with an RAI that was closed out.
10 It's RAI 381-8100 about natural circulation.

11 MR. BUDZYNSKI: Yes.

12 MEMBER REMPE: And the response back
13 from the staff. The reason I'm interested in this
14 is just for future evaluations when we look at
15 accident analysis and natural circulation in a CE
16 plant, and I guess they're basing things on some
17 Palo Verde data and in some startup testing and I
18 just was curious. Are you the person who evaluated
19 that?

20 MR. BUDZYNSKI: Yes, yes.

21 MEMBER REMPE: Okay. So could you
22 elaborate a little bit more about why you find that
23 acceptable?

24 MR. BUDZYNSKI: Okay. What we
25 initially looked at, there was a decay heat ratio of

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1 less than .87 I believe it was, and when we have
2 some hazard they come up with that number. We could
3 find it anywhere. If they said it was less than
4 that, then it's acceptable. There would be no
5 problem in natural flow conditions, okay.

6 They responded and when they responded
7 they showed that it would demonstrate that at full
8 power, the amount of heat being produced for -- I'm
9 trying to -- I don't have the question in front of
10 me, so I'm trying to think of the response.

11 MEMBER REMPE: It's okay. A good
12 approximation.

13 (Simultaneous speaking.)

14 MR. BUDZYNSKI: --heat produced at full
15 power versus the amount of heat produced at the
16 natural flow conditions, recirculation conditions
17 would be less. So therefore you're not exceeding
18 any type of thermal limits at that condition.
19 Basically, that's what they're saying.

20 And to me, that made sense, but I don't
21 have my notes in front of me to go into detail on
22 that, yeah.

23 MEMBER REMPE: Well, I pulled the NUREG
24 from the email that did the calculations for this or
25 the testing and the results, and so I guess we'll be

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1 discussing this a little bit more as we go further
2 into the DCD in other sections.

3 MR. BUDZYNSKI: Yeah. I can get better
4 information that I have on my desk on that.

5 MEMBER REMPE: Okay, thank you.

6 MR. BUDZYNSKI: Okay. RCS high point
7 events. There's no open items here. This is just a
8 description of the technical topics that were
9 covered during evaluation. Do you want me to go
10 over those, or they're just listed with it.

11 MEMBER STETKAR: I have a question, but
12 it doesn't pertain to any of the bullets here but it
13 does pertain to the vents so --

14 MR. BUDZYNSKI: Okay, go ahead then.

15 MEMBER STETKAR: In the SES, this is --
16 I need to pretty much understand what you thought
17 about it. In the SER, you start off saying the
18 staff reviewed Section 5.4.12 in accordance with the
19 standard review plan. To ensure the adequacy of the
20 RCGVS, to remove from high points in the RCS non-
21 condensible gases that could hinder natural
22 circulation and core cooling after a design basis
23 event.

24 Later on in that discussion, it says "To
25 address potential gas accumulation in the steam

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1 generator tubes, the applicant described a procedure
2 to operate the reactor coolant pump for short
3 periods of time to transfer non-condensable gases
4 from the tubes to the other RCS high points for
5 venting, therefore in accordance with 10 CFR
6 50.34(f)(2)(vi) and 10 CFR 50.46(a). Vents are
7 provided for the RCS high points for the APR1400.

8 I went back and I read the DCD pretty
9 carefully, because I stumbled over that discussion
10 in the DCD when I first read it, and I later
11 concluded that their discussion of using the reactor
12 coolant pumps was completely unrelated to a natural
13 circulation event, which to me makes a lot of sense
14 because, you know, I kind of have natural
15 circulations when I don't have the reactor coolant
16 pumps.

17 MR. BUDZYNSKI: Right.

18 MEMBER STETKAR: So I can't bump the
19 reactor coolant pumps to take non-condensibles out
20 of the steam generators during a natural circulation
21 event. You may want to go back and look carefully
22 at the way the SER is written, because I came away
23 from the SER with the conclusion that natural
24 circulation cooling is fine, and the vents are fine
25 because they can bump the reactor coolant pumps to

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1 take gas out of the U tubes during a natural
2 circulation event.

3 MR. BUDZYNSKI: Okay. I'll take a look
4 at that.

5 MEMBER STETKAR: And if that -- if that
6 was your intent, I'm very curious about how one can
7 actually do that. As I've said, when I read the
8 DCD, the way the DCD is organized they're really
9 careful to say that they can open the vents to
10 remove non-condensibles from the pressurizer and in
11 particular from the reactor vessel head I think is
12 the only time that they used the words natural
13 circulation.

14 They talk about bumping the reactor
15 coolant pumps as a way of degassing the system in
16 another part of the discussion, which is more
17 oriented toward normal operation, normal venting of
18 the system, for example, for cooldown or heat up or
19 things like that. So I'm hoping it's just my
20 reading the SER wrong, and that you're not actually
21 taking credit for that process, to facilitate
22 natural circulation cooling.

23 MR. BUDZYNSKI: Okay. I'll make that
24 an item to go back and talk to the engineer that did
25 the review.

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1 MEMBER STETKAR: It could be a wording
2 situation in the SER, or if it's actually a
3 technical conclusion, I'd like to understand how
4 they came to that.

5 MR. BUDZYNSKI: Okay.

6 MS. UMANA: Okay. We have Darren
7 Widrevitz up to present reactor coolant pressure
8 boundary materials.

9 MR. WIDREVITZ: So in terms of this
10 slide, I take the open item was an editorial concern
11 that we were looking at a little bit later in the
12 game. I think there really is no technical
13 significance to it. So unless you had questions
14 about it, I'd like to entertain questions about the
15 section in general. Does that make sense?

16 There was -- the text of the DCD implied
17 a particular -- some welding parameters were
18 sufficient to demonstrate non-sensitization, when in
19 fact it was a coupling with the ACM and A262 that's
20 ANE (phonetic), and using these parameters that they
21 felt was sufficient to produce non-sensitized
22 product.

23 CHAIRMAN BALLINGER: I think we went
24 through that to some extent with the applicant
25 yesterday on this A262 and where it's used and I

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1 think we concluded, at least I did, that Practice
2 A262A and E are -- would never be used on an actual
3 weld.

4 They might be used as part of weld
5 qualification as a Member Riccardella mentioned, but
6 not as part of any kind of QA on an actual weld on a
7 pipe, since Practice E requires a U bend sample to
8 be taken out of -- to be taken out in Practice A
9 would require basically inducing IGA in the weld
10 itself.

11 MS. UMANA: Okay, all right. We'll move
12 on. We have Section 5.2.5 on Reactor Coolant
13 Pressure Boundary Leakage Detection, and I'll be
14 covering this slide. Developing requirements of
15 this area are found in GDC 30 and GDC 20, with the
16 acceptance criteria outlined in Reg Guide 1.45 for
17 GDC 30 and Reg Guide 1.29 and 1.45 for GDC 2 (sic).

18 The staff conducted its review against
19 SRP Section 5.2.5. I'm sorry, the following review
20 -- the review areas are listed here for you. I'll
21 spare you reading all of those. This one was pretty
22 straightforward. There were three RAIs, most
23 requesting clarification and resolution of some
24 inconsistency, and all were stasured as confirmatory
25 items. I'm hoping to see those changes in the next

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1 revision to the DCD.

2 Now there was one COL information item
3 and the staff found it acceptable, because it's
4 consistent with the Reg Guide which is referenced in
5 the COL information item. Do you have -- if you
6 have any questions, I'll defer to the technical
7 reviewer in the audience.

8 CHAIRMAN BALLINGER: Maybe this is a
9 time to ask a question which I wanted to ask
10 yesterday, and it's related to this but unrelated to
11 this. I searched for, because I'm sensitized, if
12 you will, to steam generator tube leaks. So I'm
13 always after looking to see what is the allowable,
14 unidentified and identified leakage.

15 And so that number is bandied about in
16 the DCD and in one place it says .5 gallons per
17 minute is unidentified leakage is allowed, and then
18 ten gallons per minute identified leakage. Is that
19 correct?

20 MS. UMANA: Chang Li?

21 CHAIRMAN BALLINGER: Because I've seen
22 other numbers in the document and I'm thinking --

23 MS. UMANA: I have the technical
24 reviewer here. He'll be able to answer that.

25 CHAIRMAN BALLINGER: And then 150

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1 gallons per minute through one steam generator.

2 MEMBER STETKAR: That's a typo.

3 CHAIRMAN BALLINGER: That's a typo?
4 That has to be a typo, okay. I was going to say
5 that.

6 MR. LI: I am the reviewer for this
7 sections. What you said is correct for unidentified
8 leakage, the limit specified in the tech spec is .5
9 gallons per minute. For identified leakage is 10
10 gallons per minute, and there's an interface between
11 steam generator. In steam generator leakage, I
12 think you quote 150 gallons per minute?

13 CHAIRMAN BALLINGER: Yes.

14 MR. BUDZYNSKI: That's per day in the
15 tech specs.

16 CHAIRMAN BALLINGER: Per day.

17 MR. BUDZYNSKI: There's a typo in the
18 SER.

19 MR. LI: The typo, yeah.

20 CHAIRMAN BALLINGER: Okay, thank you.

21 MS. UMANA: If there are more questions,
22 we're going to move onto -- I think this is a topic
23 that you enjoy very much, the flywheel integrity and
24 I'm going to hand it over to John, and then he can
25 go through his --

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1 MEMBER STETKAR: I apologize for that.
2 I just somehow associate the flywheel with the
3 reactor coolant pump. I didn't look far enough in
4 your presentation, so sorry.

5 MR. HONCHARIK: Hi, good morning. I
6 reviewed the reactor coolant pump flywheel
7 integrity, and basically the KHNP provided some
8 areas in accordance with the Reg Guide, and that
9 included material selection and fabrication
10 technique for the flywheel, and any pre-service
11 inspection that will be done and also in-service
12 inspections, and also the overspeed testing per the
13 SRP.

14 Also they provided the flywheel analysis
15 for the Reg Guide, and that basically looked for the
16 critical speed for the ductile and non-ductile
17 fracture mechanisms, and also it included a fatigue
18 crack growth rates for the flywheel.

19 Next slide. As everyone stated, there
20 were six open items for this area. The first one
21 was basically they didn't specify what method
22 they're going to determine the fracture toughness of
23 the material in question. So basically we asked
24 that. I think they -- per yesterday, they responded
25 about I think a week ago. So we're still evaluating

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1 that, but I think they mentioned something that
2 they're going to use the direct method basically to
3 do testing for it.

4 The next item was the operating
5 experience. We have some operating experience for
6 the material that they were using. Mostly it was
7 clarifications or what actual operating experience
8 was applicable to this material and situation. So I
9 think they also provided that.

10 Next was the -- right now the applicant
11 provided an analysis using one-third ultimate
12 strength. However, the SRP specified that they used
13 a one-third yield strength. So basically we asked a
14 question okay, if you're going to use one-third of
15 the ultimate, provide justification why that's
16 acceptable. If not, use the one-third yield per the
17 SRP.

18 I think they responded, I think they're
19 probably going to use the one-third yield. They're
20 going to --

21 MEMBER STETKAR: There wasn't a big
22 difference if I recall, was there?

23 MR. HONCHARIK: Huh?

24 MEMBER STETKAR: There wasn't a very big
25 difference between those two values, was there?

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1 MR. HONCHARIK: Probably not, yeah.

2 MEMBER STETKAR: Yeah.

3 MR. HONCHARIK: So they're going to do
4 that and I think November they're supposed to
5 provide that revised analysis. The other thing that
6 they did was this flywheel is pretty much similar
7 to all the other ones, except this one has hub, some
8 place for a key. They have that hub that attaches
9 it to the rotor.

10 So basically we're asking that they also
11 do an analysis of that hub, you know, because if
12 that fails, it could potentially release the
13 flywheel. So I think they responded and they're
14 going to do analysis and I think basically they're
15 basing a lot of it on all that's going to be
16 compression. So that will be coming in November
17 along with the other analysis.

18 And also any inspections that you're
19 going to be doing on that hub should be the same as
20 the flywheel. So they're also responding to that.

21 The next was the -- this was just a
22 minor one. Basically, they needed to specify what
23 the acceptance criteria for the NDE methods, so that
24 the acceptance criteria for flaw size, it will be
25 bounded by the analysis. So we're just looking to

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1 make sure that that was consistent and they respond
2 to that. I think they're going to put that in the
3 DCD.

4 Next slide, and the last one was
5 basically to put in the DCD, because they didn't
6 mention anything about annual inspections of the
7 hub. So we asked them that they would need to put
8 some inspection criteria for the hub. Basically,
9 that was our review for the flywheel. Any
10 questions?

11 (No response.)

12 MR. HONCHARIK: Thank you.

13 MS. UMANA: Okay. We're going to move
14 on to Greg Makar. He's going to present on the
15 steam generator program.

16 MR. MAKAR: The review in Sections
17 5.4.2.1 and 5.4.2.2 address a variety of materials
18 and design and inspection topics. Our slide here
19 just refers to the one open item that we had, and
20 that is a -- the accident induced leakage
21 performance criterion in the tech specs, which was
22 the value proposed is an acceptable value, but
23 that's also described in a number of places in the
24 tech spec bases.

25 We found some potential inconsistencies

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1 and weren't certain that it, that the value that
2 we're using was consistent with the accident
3 analyses in Chapter 15. So after discussing that
4 with them in our radiation protection and accident
5 consequences branch, we found that it was really an
6 administrative issue, that there just needed to be
7 some, some edits in the tech spec bases to --

8 MEMBER STETKAR: That's what I wanted to
9 make sure. I thought that -- I'm glad you clarified
10 that. So it's simply making sure that the citations
11 of things like .3 GPM and .6 GPM in the tech spec
12 bases align with the values that were used for
13 transients and steam line breaks respectively in the
14 Chapter 15 analyses, right. You're not questioning
15 it all, the 150 gallons per day.

16 MR. MAKAR: Operationally.

17 MEMBER STETKAR: Operational limit at
18 all. Okay, thanks. Thank you.

19 MR. MAKAR: So the applicant has since
20 responded to that and clarified that. So we are --
21 we'll be closing that open item and tracking it as
22 confirmatory.

23 MS. UMANA: Okay, and just to top off
24 the presentation I provided.

25 MEMBER STETKAR: Don't go too far yet.

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1 MS. UMANA: Oh.

2 MEMBER STETKAR: Chris, no Chris.

3 MS. UMANA: Oh.

4 MEMBER STETKAR: I know where he's
5 going. I'm trying to turn him off for a second.

6 MS. UMANA: This is just a courtesy list
7 of the acronyms used throughout Chapter 5 and some
8 that you probably heard in the presentation, if you
9 are interested in referencing it.

10 MEMBER STETKAR: As usual, they can't
11 shut me up. They try.

12 CHAIRMAN BALLINGER: We don't want to.

13 MEMBER STETKAR: Yes, you do but --

14 CHAIRMAN BALLINGER: Okay, we do.

15 MEMBER STETKAR: And I'm okay with that.
16 Yesterday, I noted that the applicant has included
17 this Appendix 5A specifically addressing the inter-
18 system LOCA evaluations, and I had not seen in other
19 design certifications such an extensive evaluation
20 of that topic, and I'd like --

21 Again, I think that's very, very good.
22 It shows a lot of thoughtfulness. I had a question
23 for the staff, and this is -- I saved it for you
24 because it's I think more pertinent for you.

25 In their evaluations, in particular of

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1 the shutdown cooling system, the safety injection
2 system and containment spray system, they rely
3 substantially, I don't think entirely but
4 substantially, at least in the DCD, on the fact that
5 they designed those piping systems outside the
6 containment to a pressure of 900 pounds, 900 psig,
7 which they say is 40 percent of the normal reactor
8 coolant system operating pressure of 2,250 psi.

9 I think that's a good idea, you know.
10 They've in fact enhanced the design of those
11 systems. The reason I have a question for the
12 staff, and that I'd like to have a little discussion
13 about this is that they repeatedly refer to things
14 like this is in accordance with the NRC's position
15 presented in the NRC Letter Reference 2.

16 And the Letter Reference 2 is the NRC
17 letter preliminary evaluation of the resolution of
18 the inter-system loss of coolant accident issue for
19 the Advanced Boiling Water Reactor design pressure
20 for low pressure systems, Docket No. 52-001. So
21 we've got that on the record.

22 The staff's SER says well, you looked at
23 that 900 pounds and you concluded that it's
24 consistent with past applicant practices that you
25 found acceptable, and you have reasonable assurance

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1 that at this design pressure, the integrity of the
2 SES will be maintained.

3 My question is I haven't seen that
4 argument used in any other design certification, and
5 this seems to be establishing a precedent, such that
6 if I just come in and claim that my shutdown cooling
7 system, residual heat removal system or any other
8 low pressure system at 40 percent of my reactor
9 coolant system operating pressure, I get carte
10 blanche. I can't have an interfacing system LOCA,
11 because that is NRC's position.

12 And in this particular application, I
13 can personally point to other things that provide
14 additional protection in those systems against
15 interfacing system LOCAs, and therefore draw my own
16 conclusion about the susceptibility of those systems
17 to breaks or the likelihood of their being
18 overpressurized and then failing.

19 But what I'm asking the staff is is this
20 an NRC regulatory position, because as we are all
21 painfully aware, that once this is written in a
22 safety evaluation report for this applicant, it
23 will become regulatory precedent. I think there's a
24 danger in doing that. I think that use of enhanced
25 piping system design is part of the -- part of the

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1 solution.

2 I think that judicious locations of
3 pressure relief valves, temperature indications,
4 pressure indications, automatic or manual isolation
5 release flow paths and those types of things are all
6 -- testing. For example, how frequently do you go
7 in and test interstitial spaces, to make sure that
8 they're not overpressurized, that you don't have
9 leakage that you perhaps couldn't monitor.

10 They're all part of the solution of
11 this, not just simply saying well I've designed my
12 piping to greater than 40 percent of reactor coolant
13 system pressure. So I'd ask you to take that and
14 come back and say is that a formal NRC regulatory
15 position regarding interfacing system LOCAs.

16 The reason I'm concerned about that is
17 twofold. Number one, from just a regulatory
18 footprint, and number two, I certainly don't want to
19 in the future go fighting battles with people doing
20 risk assessments, saying that we don't need to
21 consider thinking about interfacing system LOCA
22 because the NRC staff has told us that we are
23 absolutely safe because our piping is designed to 40
24 percent of reactor coolant system pressure. We've
25 faced those battles in the past.

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1 So the other thing I'll bring up is that
2 the -- in research, they're currently working on the
3 Level 3 PRA project, and as part of that project,
4 they've had rather extensive work done on
5 interfacing system LOCAs. I don't know what the
6 current status of that is. We had a briefing some
7 time recently, which might have been several months
8 ago.

9 As part of that process, there was a
10 report produced out at PNNL, and I'll give you the
11 citation. It's PNNL 24783, Expert Elicitation to
12 Support Interfacing System Loss of Coolant Accident
13 Modeling, and the Level 3 PRA project is not using
14 that report verbatim, but they're using information
15 from that report to inform their treatment of
16 interfacing system LOCAs.

17 I'm curious whether this old letter
18 report, and I trace back a little bit on the history
19 of the thing with NUREG/CRs, not NUREGs. NUREG/CRs,
20 some of which I can't even find in ADAMS because
21 they're so old, whether that is still consistent
22 with the NRC regulatory position, research position
23 and so forth on susceptibility to interfacing system
24 LOCAs.

25 So if you can kind of take that kind of

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1 long rambling approach. I'm not necessarily -- I'm
2 not right now, because this is a subcommittee
3 meeting, I personally am not questioning the
4 applicant's conclusions regarding interfacing system
5 LOCA.

6 But I base my conclusion not only on
7 that 900 pounds. I base it on other features of the
8 system's designs that I've looked at and what they
9 claim they will be doing in terms of monitoring and
10 testing and inspection and so forth.

11 So and I, you know, it's just I had to
12 bring it up as I did yesterday because neither the
13 applicant nor the staff made any mention in their
14 presentations about, you know, Appendix 5A, about
15 this analysis. Yet in the SER, you've addressed it
16 and the applicant obviously has done quite a bit of
17 work, time working on this.

18 If we're design certification, they're
19 beyond design basis events. I will admit that.
20 They can be really, really important if not
21 addressed sufficiently in the world of risk
22 assessment, as you're well aware, and now I'm done
23 sir.

24 CHAIRMAN BALLINGER: Thank you. Other
25 questions from members at this point? We're getting

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1 the phone line open. We should hear the eruption of
2 crackles shortly. While we're doing that, are there
3 any folks in the audience that would like to make a
4 comment or a statement?

5 (No response.)

6 CHAIRMAN BALLINGER: Yes, it is. It's
7 open. Is there anybody out there on the line? Can
8 you identify yourself or make yourself known so we
9 can verify that this line is open? Maitri's not
10 even up.

11 MS. BANNERJEE: Yeah. This is Maitri.

12 CHAIRMAN BALLINGER: She is up. Thank
13 you. Now is there anybody else out there that would
14 like to make a statement?

15 (No response.)

16 CHAIRMAN BALLINGER: Hearing none, I
17 think we're done there. Okay. Now in closing, can
18 we go -- we'll go around the table, start with Pete
19 this time.

20 MEMBER RICCARDELLA: I have no comments.

21 CHAIRMAN BALLINGER: Dana?

22 MEMBER POWERS: (No audible response.)

23 CHAIRMAN BALLINGER: Matt?

24 MEMBER SUNSERI: No comments, thanks.

25 MEMBER STETKAR: Nothing more, other

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1 than to say I was pretty impressed with the staff's
2 review of Chapter 5 in particular. Did a pretty, a
3 pretty doggone thorough review. So good job.

4 CHAIRMAN BALLINGER: Jose?

5 MEMBER MARCH-LEUBA: No comment.

6 CHAIRMAN BALLINGER: Charles, Charlie?

7 MEMBER BROWN: No more comments.

8 CHAIRMAN BALLINGER: You're not even
9 here. Oh, there you are over there.

10 MEMBER BROWN: I am.

11 CHAIRMAN BALLINGER: Joy, I don't know
12 where her name tag is.

13 MEMBER REMPE: It's hiding among the
14 electrical cords. But I have no additional
15 comments. Thanks for your efforts and your
16 presentations today. Thank you for your time.

17 CHAIRMAN BALLINGER: Well, we thank you
18 very much. Again, I would like to express my
19 gratitude for the time and effort and the
20 thoroughness of your presentations, both the
21 applicant and the staff, and with that, we are
22 adjourned.

23 (Whereupon, the above-entitled matter
24 went off the record at 9:31 a.m.)

25

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Presentation to the ACRS Subcommittee

**Korea Hydro Nuclear Power Co., Ltd (KHNP)
APR1400 Design Certification Application Review**

Safety Evaluation with Open Items: Chapter 5

REACTOR COOLANT SYSTEM AND CONNECTING SYSTEMS

SEPTEMBER 22, 2016

- **Technical Staff Presenters**

- ♦ John Budzynski – DCD Sections 5.2.2, 5.4.1.2, 5.4.7, & 5.4.1.12
- ♦ Dan Widrevitz – DCD Section 5.2.3
- ♦ Jessica Umaña – DCD Section 5.2.5
- ♦ John Honcharik – DCD Section 5.4.1.1
- ♦ Greg Makar – DCD Sections 5.4.2.2

- **Project Managers**

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- ♦ Jessica Umaña – Chapter 5 Project Manager

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- ♦ **Gregory Makar**
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- ♦ **Steven Downey**
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- ♦ **Eric Reichelt**
Materials & Chemical Engineering Branch

Overview of Design Certification Application, Chapter 5

SRP Section/Application Section		No. of Questions	Number of OI
5.2.1.1	Compliance with the Codes and Standards Rule, 10 CFR 5055a	3	0
5.2.1.2	Compliance with Applicable Code Cases	2	0
5.2.2	Overpressure Protection	7	3
5.2.3	Reactor Coolant Pressure Boundary Materials	22	1
5.2.4	Inservice Inspection and Testing of the Reactor Coolant Pressure	2	0
5.2.5	Reactor Coolant Pressure Boundary Leakage Detection	3	0

Overview of Design Certification Application, Chapter 5

SRP Section/Application Section		No. of Questions	Number of OI
5.3.1	Reactor Vessel Materials	0	0
5.3.2	Pressure-Temperature Limits, Pressurized Thermal Shock, and Upper-Shelf Energy Data and Analyses	1	0
5.3.3	Reactor Vessel Integrity	0	0
5.4	Reactor Coolant System Component and Subsystem Design	2	1
5.4.1.1	Reactor Coolant Pump Flywheel Integrity	12	6
5.4.1.2	Reactor Coolant Pump	0	0

Overview of Design Certification Application, Chapter 5

SRP Section/Application Section		No. of Questions	Number of OI
5.4.2.1	Steam Generator Materials	3	0
5.4.2.2	Steam Generator Program	6	1
5.4.3	Reactor Coolant Piping	0	0
5.4.7	Residual Heat Removal System	4	1
5.4.10	Pressurizer	0	0

Overview of Design Certification Application, Chapter 5

SRP Section/Application Section		No. of Questions	Number of OI
5.4.11	Pressurizer Relief Tank	0	0
5.4.12	Reactor Coolant System High-Point Vents	10	0
Totals		77	13

Technical Topics

Section 5.2.2 – Overpressure Protection

Technical Topics

- System Design
 - ♦ Overpressure protection for (1) RCS, (2) primary side of systems connected to RCS, and (3) secondary side of SGs
 - RCPB overpressure protection consist of 4 POSRV, 2 SCS RV, and 20 MSSV (5 per steamline)
 - ♦ SCS suction line relief valves provide sufficient pressure relief capacity to mitigate the most limiting low temperature overpressure protection (LTOP)

Technical Topics

Section 5.2.2 – Overpressure Protection

Open Items

- **RAI 8244, Question 05.02.02-1** – Provide information regarding the analysis performed to demonstrate that POSRV and SCS RV provide sufficient capacity to maintain the pressure below the limit during full power and LTOP conditions.
 - ♦ **Status:** The response was received on 12/11/2015. The POSRV analysis was adequately addressed; however, the LTOP analysis did not address staff concerns related to methodology, codes, input parameters, and assumptions used in the LTOP analysis. This question is closed unresolved.
- **RAI 8609, Question 05.02.02-7 Follow up question** - Provide a description of the analysis methodology, computer codes, input parameters, and assumptions used in the analysis of the limiting LTOP event(s). Provide justification that the inputs are suitably conservative.
 - ♦ **Status:** The response was received on 6/9/2016. The follow up RAI response is currently in evaluation.
- **RAI 8244, Question 05.02.02-5** - Address the difference between the pre-service testing requirements and Chapter 14 test.
 - ♦ **Status:** The response was received on 6/9/2016. The response was found acceptable because the complete pre-service testing is included in the Section 14.2 rewrite. The staff confirmed the revision. This question is closed resolved.

Technical Topics

Section 5.4.1.2 – Reactor Coolant Pumps

Technical Topics

- Pump Design
 - ♦ RCP is a vertical shaft, single-stage, centrifugal pump
 - ♦ Loss of Component Cooling Water Event
 - CCW flows to pump/motor bearing oil coolers, motor air coolers, and high-pressure seal water cooler stopped
 - CVCS continues to provide seal water injection flow to the RCP seals
 - Pump/motor bearings designed to withstand loss of CCW for 30 minutes
 - CCWS Division 1 supports charging pump mini flow heat-exchanger in CVCS and all coolers on the RCPs
 - ♦ RCP seal design is improved to have low seal leakage rates during a station black-out (SBO) event

Technical Topics

Section 5.4.1.2 – Reactor Coolant Pumps

Open Items

- **RAI 8555, Question 05.04-2, Part 1** – With respect to Loss of Component Cooling Water, provide a response to clarify whether the loss of CCW Division 1 affects the charging pump operation during the 30-minute period following the event
 - ♦ **Status:** The response was received 4/29/2016. The response was found acceptable because of the loss of the CCW to the charging pump only has a long term effect on its operation. This question is closed resolved.
- **RAI 8555, Question 05.04-2, Part 2** – Revise DCD Section 5.4 to include a summary of the seal leakage test results that show the low seal leakage rate during a simulated SBO event.
 - ♦ **Status:** The response was received on 4/29/2016). The response was found acceptable because the DCD is being revised to include a reference to the seal test report. This question is closed resolved.

Technical Topics

Section 5.4.7 – Shutdown Cooling

Technical Topics

- System Design
 - ♦ Configuration Similar to Current PWR Designs,
 - Two independent trains – SCP interchangeable with CSP
 - ♦ Used during startup/shutdown and refueling operations
 - During shutdown and refueling RHR is placed in service below approximately 450 psig and 350°F
- Evaluated against GL-2008-01 and RIS 2013-09
- Evaluated against NEI 09-10 Rev 1a-A – Prevention and Management of System Gas Accumulation

Technical Topics

Section 5.4.7 – Shutdown Cooling

Open Items

- **RAI 8614, Question 05.04.07-4** – Provide ITAAC to the SCS design that addresses GL-2008-01 and NEI 09-10 with respect to managing gas accumulation during plant operations
 - ♦ **Status:** The response was received on 7/8/2016. The ITAAC was adequately addressed and in compliance with NEI 09-10 Revision 1a-A; however, NEI 09-10 was referenced in the DCD. The staff will discuss the need to include the reference with the applicant. This question currently remains in evaluation.

Technical Topics

Section 5.4.12 – RCS High Point Vents

Technical Topics

- 10 CFR 50.34(f)(2)(vi) and TMI Action Plan Item II.B.1 require high point vents, and 10 CFR 50.46a specifies acceptance criteria
 - ♦ Remove non-condensable gases from high points in the RCS to maintain adequate core cooling (enhance natural circulation)
 - ♦ The RCS high points are the reactor vessel head, pressurizer, and steam generator U-tubes; however, individual U-tubes are not required to have high point vents (10 CFR 50.46a)
- APR1400 High Point Vent Design: Standard Configuration
 - ♦ Safety-grade vent paths: (1) reactor vessel head to in-containment refueling water storage tank (IRWST); and (2) pressurizer head to IRWST
 - ♦ Each safety-grade vent path has two parallel vent paths with two normally closed solenoid-operated valves in series
 - ♦ Small-break loss-of-coolant accident analyses bound potential vent line breaks upstream of isolation valves
- Operating procedures described at a high level in the DCD; detailed operating procedures to be developed by COL applicant

Technical Topics

Section 5.2.3 – Reactor Coolant Pressure Boundary

Open Item

- **Open Item, DCD Clarification** - It was determined that a portion of DCD text providing additional detail beyond the staff criteria for establishing that austenitic materials used for the RCPB will not be sensitized should be removed from the DCD. Since the DCD will be granted finality by rulemaking, this removal is necessary as the staff could not make a specific regulatory finding regarding its accuracy.
 - ♦ **Status:** The applicant has been notified and the staff has scheduled a meeting with the applicant to review this.

Technical Topics

Section 5.2.5 – Reactor Coolant Pressure Boundary Leakage Detection

Technical Topics

- Regulatory Requirements: GDC30, GDC2
- Review Guidance: SRP Section 5.2.5
For GDC 30 on RCPB leakage detection, the review is based on RG 1.45.
For GDC 2 on seismic design, the review is based on RG 1.29 and RG 1.45.
- Review Areas: leakage detection capability, sensitivity, and response time; leakage detection systems; seismic qualification; leakage instrumentation in the control room; prolonged low-level RCS leakage; separation of identified and unidentified leakage; intersystem leakage; plant TSs; initial testing program; ITAAC; and COL information items.
- Three RAIs were issued and all are being resolved pending confirmation in the next revision of the DCD.
- One COL information item.

Technical Topics

Section 5.4.1.1 – Reactor Coolant Pump (RCP) Flywheel Integrity

Technical Topics

RCP flywheel analyzed to prevent fracture and possible missile.

- KHNP provided:
 - ♦ Material selection, fabrication techniques, preservice and inservice inspections and overspeed testing per NUREG-0800
 - ♦ Analysis per RG 1.14 (APR1400-A-M-NR-14001)
 - Critical speeds for ductile and non-ductile fracture
 - Fatigue crack growth

Technical Topics

Section 5.4.1.1 – RCP Flywheel Integrity

Open Items

- **RAI 8641, Question 05.04.04.01-7** – The applicant needs to provide the method for determining fracture toughness.
 - ♦ **Status:** This question is currently waiting a response.
- **RAI 8641, Question 05.04.01.01-8** - The applicant needs to provide operating experience for the flywheel material 26 NiCrMoV 14-5.
 - ♦ **Status:** This question is currently waiting a response.
- **RAI 8641, Question 05.04.01.01-9** - The applicant needs to provide analysis using design acceptance criteria of 1/3 yield strength or provide justification for using 1/3 ultimate strength as the design acceptance criteria.
 - ♦ **Status:** This question is currently waiting a response.
- **RAI 8641, Question 05.04.01.01-10** - The applicant needs to provide analysis of the hub and why crack growth rates used for the flywheel are applicable to the specific flywheel material.
 - ♦ **Status:** This question is currently waiting a response.
- **RAI 8641, Question 05.04.01.01-11** – The applicant needs to provide in the DCD the maximum flaw size used in the analysis and that can be detected by the applicable NDE method.
 - ♦ **Status:** This question is currently waiting a response.

Technical Topics

Section 5.4.1.1 – Reactor Coolant Pump (RCP) Flywheel Integrity

Open Items (continued)

- **RAI 8641, Question 05.04.01.01-12** - The applicant needs to include in the DCD the applicable PSI and ISI for the hub that is consistent with the flywheel to ensure the integrity of the hub is maintained.
 - ♦ **Status:** This question is currently waiting a response.

Technical Topics

Section 5.4.2.2 – Steam Generator Program

Open Items

- **RAI 494-8620, Question 05.04.02.02-6** - The assumed values for primary-to-secondary leakage described in the TS Bases (B 3.4.12 and B 3.4.17) appeared to be inconsistent with the accident analyses described in Chapter 15. Question 05.04.02.02-6 requested clarification of the leakage values in the TS Bases and how they are consistent with applicant's accident analyses and the Standard Technical Specifications (STS). Consistency between the accident analyses, APR1400 TS, and STS is needed to establish and implement a Steam Generator Program to ensure that tube integrity is maintained. This is part of meeting GDC 32.
 - ♦ **Status:** The response was received 7/26/2016. The response clarified the accident analysis assumptions and proposed revisions to TS Bases Sections B 3.4.12 and B 3.4.17 that are consistent with the accident analyses and STS. Therefore, the response is acceptable, this open item will be **closed**, and Question 5.04.02.02-6 will be tracked as a confirmatory item.

ACRONYMS

10 CFR – Title 10 of the Code of Federal Regulations

CCW – component cooling water

CVCS – chemical and volume control system

COL – combined license

DV – depressurization valve

FSAR – Final Safety Analysis Report

MCR – main control room

MOV – motor operated valve

PRT- pressurizer relief tank

PTLR – Pressure – Temperature Limits Report

PTS – pressurized thermal shock

PWR – pressurized water reactor

RAI – request for additional information

RCP – reactor coolant pump

RCPB – reactor coolant pressure boundary

RCS – reactor coolant system

RCSHPV – reactor coolant system high point vent

RG – Regulatory Guide

RHR – residual heat removal

RVHVS – reactor vessel head vent system

RWSP – refueling water storage pit

SDV – safety depressurization valve

SER – safety evaluation report

SRP – Standard Review Plan

SRV – safety relief valve