

NRR-PMDAPem Resource

From: Wentzel, Michael
Sent: Monday, May 08, 2017 2:35 PM
To: Mack, Jarrett; Catron, Steve
Cc: Hanek, Olga; Czaya, Paul
Subject: RE: Draft Request for Information re: Turkey Point 3 & 4 LAR 246 - CREVS TS (CACs MF8221 & MF8222)

Steve and Jarrett,

Based on the discussion that took place on our phone call earlier today, I understand that NextEra intends to voluntarily submit a supplement to LAR 246 that will address the discrepancies identified below. As such, the NRC staff will not issue a final version of its draft request for additional information and you may consider the request withdrawn.

If you have any questions, or would like to discuss further, please let me know.

Thanks,
Mike

From: Wentzel, Michael
Sent: Friday, May 05, 2017 10:14 AM
To: Mack, Jarrett ; Hanek, Olga
Subject: Draft Request for Information re: Turkey Point 3 & 4 LAR 246 - CREVS TS (CACs MF8221 & MF8222)

Jarrett and Olga,

As I had mentioned earlier this week, the staff has determined that it needs additional information to complete its review of LAR 246. Below is a draft of the staff's request. Once you have had a chance to review, please let me know if you would like to have a clarification call to discuss.

If you have any questions, please let me know.

Thanks,
Mike

ARCB-RAI-6

Regulatory Analysis Basis

Section 50.36, "Technical Specifications," to Title 10 of the *Code of Federal Regulations* (10 CFR) contains the Nuclear Regulatory Commission's (NRC's) regulatory requirements related to the content of the Technical Specifications (TSs). This regulation requires that the TSs include items in the following specific categories: (1) safety limits, limiting safety systems settings, and limiting control settings; (2) limiting conditions for operation; (3) surveillance requirements; (4) design features; (5) administrative controls; (6) decommissioning; (7) initial notifications; and (8) written reports.

NUREG-1431, "Standard Technical Specifications Westinghouse Plants Revision 4.0," Volume 1, Specifications dated April 2012 contains the improved STS for Westinghouse plants. The improved STS were developed based on the criteria in the Final Commission Policy Statement on Technical Specifications

Improvements for Nuclear Power Reactors, dated July 22, 1993 (58 Federal Register 39132), which was subsequently codified by changes to 10 CFR 50.36 (60 FR 36953). Licensees adopting portions of the improved STS to existing technical specifications should adopt all related requirements, as applicable, to achieve a high degree of standardization and consistency.

Technical Basis for the Request

In letter dated March 31, 2017, the licensee responded to the NRC staff's request for additional information provided in email dated March 7, 2017 (ADAMS Accession number ML17067A057). The NRC staff's email (ARCB-RAI-5) requested that the licensee either (1) provide a synopsis of a fuel handling accident analysis that supports the proposed change, (2) revise the proposed changes to remove the extension of the use of mitigating actions to Modes 5, 6, and during movement of irradiated fuel assemblies, or (3) otherwise explain how the proposed changes regarding the extension of the use of mitigating actions to Modes 5, 6, and during movement of irradiated fuel assemblies meet 10 CFR 20.1701, 10 CFR 20.1702, and the regulatory guidance in STS 3.7.10 contained in NUREG-1431.

The licensee's response to the email acknowledged that TS 3.7.5 Action b, as proposed in the letters stated above, did not provide a commensurate level of safety during Modes 5, 6, and during the movement of irradiated fuel assemblies when compared to NUREG-1431, Revision 4, Standard Technical Specifications – Westinghouse Plants. Their response withdrew the request to extend the use of mitigating actions to Modes 5, 6, and during the movement of irradiated fuel assemblies in the event of an inoperable control room envelope (CRE) boundary and instead proposes the immediate suspension of irradiated fuel movement for the duration of CRE boundary inoperability during these operational modes. Attachment 1 in the licensee's response provides the affected TS 3/4.7.5 page marked up to show their proposed changes, and Attachment 2 provides the retyped (clean copy) TS 3/4.7.5 page. However both the TS 3/4.7.5 page marked up and the clean copy still contain the added phrase "following which movement of irradiated fuel may resume," and the marked up and clean copy TS pages differ in that the clean copy pages contain the phrase "during MODES 1, 2, 3 or 4" but the marked up pages do not.

Request

1. Provide a revised set of marked up pages to correct the discrepancy between the marked up and clean copy.
2. Provide the basis for why keeping the phrase "following which movement of irradiated fuel may resume" is appropriate, given the information in the Basis for the Request section of ARCB RAI-5 and the discussion provided in the March 31 response to ARCB-RAI 5.

The NRC staff notes that the following would be consistent with NUREG-1431:

- b. With the Control Room Emergency Ventilation System inoperable due to an inoperable CRE boundary during MODES 1, 2, 3 or 4, immediately initiate action to implement mitigating actions. Within 24 hours, verify mitigating actions ensure CRE occupant radiological and chemical hazards will not exceed limits and CRE occupants are protected from smoke hazards, and restore CRE boundary to OPERABLE status within 90 days.

With the above requirements not met, be in at least HOT STANDBY within the next 6 hours for one Unit, or 12 hours for both Units, and in COLD SHUTDOWN within the following 30 hours.

With the Control Room Emergency Ventilation System inoperable due to an inoperable CRE boundary during MODES 5, 6, or during the movement of irradiated fuel assemblies, immediately suspend all movement of irradiated fuel.

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Email Number: 3505

Mail Envelope Properties (Michael.Wentzel@nrc.gov20170508143400)

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(CACs MF8221 & MF8222)
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Created By: Michael.Wentzel@nrc.gov

Recipients:

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Tracking Status: None

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Tracking Status: None

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Tracking Status: None

"Catron, Steve" <Steve.Catron@fpl.com>

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