

## **NRR-PMDAPEm Resource**

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**From:** Mahoney, Michael  
**Sent:** Friday, May 12, 2017 9:07 AM  
**To:** Art Zaremba  
**Cc:** 'Edwards, Nicole D'  
**Subject:** Request for Additional Information - Catawba TSTF-197

Art,

By letter dated December 15, 2016 (Agencywide Documents Access Management System (ADAMS) Accession No. ML16350A422), Duke Energy (the licensee), submitted an application to revise McGuire Nuclear Station, Units 1 and 2 (MNS) Technical Specifications (TS) to adopt multiple Technical Specification Task Force (TSTF) Travelers, specifically TSTF-197-A, Revision 2, "Require containment closure when shutdown cooling requirements are not met," (CAC Nos. MF8971 and MF8972).

In order to complete its review, the U.S. Nuclear Regulatory Commission staff requests the following additional information. Please provide your response to the attached request for additional information within 30 days of the date of this correspondence.

### **RAI-1**

The Improved Standard TS markups for TS 3.9.5 Required Action A.6.2 and TS 3.9.6 Required Action B.5.2, as included in TSTF-197-A for NUREG-1431, are proposed to read: "Verify each penetration is capable of being closed by an OPERABLE Containment Purge and Exhaust Isolation System." The LAR proposes the new CNS TS 3.9.4 Required Action A.6.2 and TS 3.9.5 Required Action B.5.2 to deviate from the TSTF-197-A language, as follows: "Verify each penetration is capable of being closed on a high containment radiation signal." The LAR notes the relevant containment purge valve closure signal in Mode 6 is the high containment activity signal.

It is stated, in part, in the LAR, "CNS has a Containment Purge Exhaust System. At CNS, as described in Updated Safety Analysis Report (UFSAR) Sections 6.2.4 and 9.4.5, the containment purge isolation valves close on a Phase A Containment Isolation Signal (SI) or a high containment activity signal." Further, TS LCO 3.9.3c states, "Each penetration providing direct access from the containment atmosphere to the outside atmosphere either: 1. closed by a manual or automatic isolation valve, blind flange, or equivalent, or 2. exhausting through an OPERABLE Containment Purge Exhaust System (CPES) HEPA filter and carbon absorber."

Please explain why the proposed new CNS Required Actions A.6.2 and B.5.2 require verification that each penetration is capable of being closed on a high containment radiation signal, and not by the Containment Purge and Exhaust System.

### **RAI-2**

TS 3.9.4, Condition A, Required Action A.4 and TS 3.9.5, Condition B, Required Action B.3 are proposed to be revised. Part of the proposed changes are to add new Required Actions A.6.2 and B.5.2. Required Actions A.6.2 and B.5.2 are proposed to state, "Verify each penetration is capable of being closed on a high containment radiation signal," with a Completion Time of 4 hours. Further, according to the licensee, the containment high radiation monitor is addressed in Selected Licensee Commitment (SLC) 16.7.10, "Radiation Monitoring for Plant Operations", but not in TS.

Since the containment high radiation monitors are not addressed in TSs, explain how each penetration is verified as being capable of being closed on a high containment radiation signal in MODE 6 and how it is

ensured that a high containment radiation signal is available and capable of performing its intended safety function.

Once this email is added to ADAMS, I will provide you with the accession number for your reference.

Mike

**Michael Mahoney**

McGuire and Catawba Project Manager, Division of Operating Reactor Licensing

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**Hearing Identifier:** NRR\_PMDA  
**Email Number:** 3509

**Mail Envelope Properties** (3a6aba1067664b35801e93e3aed6d67b)

**Subject:** Request for Additional Information - Catawba TSTF-197  
**Sent Date:** 5/12/2017 9:06:36 AM  
**Received Date:** 5/12/2017 9:06:38 AM  
**From:** Mahoney, Michael

**Created By:** Michael.Mahoney@nrc.gov

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Tracking Status: None

**Post Office:** R4PWMSMRS03.nrc.gov

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	3534	5/12/2017 9:06:38 AM

**Options**  
**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**