

PMSummerColpEM Resource

From: Gleaves, Bill
Sent: Friday, June 16, 2017 1:40 PM
To: PMSummerColpEM Resource
Subject: V.C. Summer LAR 15-17 Rev 2 Draft RAI
Attachments: V.C. Summer LAR 15-17 Rev 2 Draft RAI(rev).docx

Attached is V.C. Summer LAR 15-17 Revision 2 draft Request for Additional Information.

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"PMSummerColpEM Resource" <PMSummerColpEM.Resource@nrc.gov>
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Request for Additional Information

V.C. Summer Nuclear Station Units 2 and 3

License Amendment Request, LAR 15-17 R2

“Addition of New Turbine Building Sump Pumps to ITAAC”

The NRC staff considered the following regulatory requirements in reviewing the license amendment request (LAR) that included the UFSAR changes.

The NRC regulations in 10 CFR 50.90 state that whenever a holder of a license desires to amend the license, an application for an amendment must be filed with the Commission fully describing the changes desired, and following as far as applicable, the form prescribed for original applications. The NRC regulations in 10 CFR 52.98(c) state, in part, that if the COL references a certified design, then changes to or departures from information within the scope of the referenced design certification rule are subject to the applicable change procedures in that rule. Section VIII, Processes for Changes and Departures, in 10 CFR Part 52, Appendix D, describes the procedures for changes to Tier 1 and Tier 2 information within the scope of the AP1000 design certification.

GDC 60 requires, in part, a power unit design to “include means to control suitably the release of radioactive materials in liquid effluents ... produced during normal reactor operation, including anticipated operating occurrences.”

While reviewing LAR 15-17, Revision 2, the staff finds the amendment request does not provide sufficient detail to determine that the additional in-flow of liquid will not overflow the turbine sumps with regards to capacity and level instrumentation.

The staff's concern is that simply adding a pump without knowledge of its requirements/capability or knowledge of the liquid source amount, there is no verification of whether the additional pumps would be able to control a release (overflow) from the turbine main sumps. Also, upon detection of radioactive materials in the sump pump discharge, the LAR indicates that the pumps will automatically shut off; however, there is no automatic shut off of the in-flow sources pumping liquids into these turbine main sumps. In addition, and unlike the other radioactive waste sumps described in DCD Tier 2, Section 9.3.5, there is no HIGH-HIGH level instrumentation to warn operators to take action before overflow of the sumps. These sumps would now contain (or be overflowed with) potentially contaminated liquids. The staff is concerned that, by only having the HIGH level instrumentation and not both HIGH and HIGH-HIGH, the operators would not be fully informed of how quickly the sump is filling and they would not get the second warning for them to take immediate action.

The applicant is requested to provide additional information about the capacity of the pumps (i.e., gpm rating), the worst case in-flow rate and volume expected from the condensate polishing system (CPS) rinse operation, the expected timeframe between a HIGH-level alarm activation and overflow of the sump(s), and whether the plant service air is capable of supporting/running these additional sump pumps. The applicant is also asked to clarify whether these turbine main sumps are designed to have a freeboard allowance similar to those radioactive waste sumps described in DCD Tier 2, Section 9.3.5.