

From: Brian Mann <Brian.Mann@excelservices.com>
Sent: Monday, July 24, 2017 2:38 PM
To: Honcharik, Michelle
Cc: ANDERSON, Victoria; Tjader, Theodore; kjse@pge.com; Myung.Kang@duke-energy.com
Subject: [External_Sender] Discussion of I&C Related Issues regarding TSTF-505

Michelle,

The industry would like to discuss three issues related to instrumentation and control (I&C) systems modified by TSTF-505. These issues were raised by the NRC the May 4, 2017 document.

Issue 1: Many of the Conditions in the NRC's table are for conditions similar to "One or more channels...inoperable" or "two or more channels...inoperable." While the safety function may be performed with some number of channels inoperable, it may not be possible to perform the function for all circumstances in which the phrase "or more" would be applicable.

Industry Suggested Resolution: An alternative to the presentation in TSTF-505 would be to limit the TS Condition to when the minimum number of channels needed to perform the function are operable (assuming no additional failures). The Required Actions and Completion Times would be the same and would provide the option to calculate a RICT. Either a new condition would be created that applies when less than the minimum number of channels are operable or, depending on the construction of the TS, LCO 3.0.3 would apply. The licensee would need to justify that the function can still be performed in the revised Action.

Issue 2: The NRC table included the following for NUREG-1431, Westinghouse plants:

NUREG-1431 LCO Condition	LCO and Condition Text/Description	Comments/ Notes
3.3.1.F	LCO: The RTS instrumentation for each Function in Table 3.3.1-1 shall be OPERABLE. Condition: One Power Range Neutron Flux - High channel inoperable.	Treat as LOF

Industry Question: Please explain why one Power Range Neutron Flux - High channel inoperable is treated as a loss of the ability to perform the safety function.

Issue 3: The NRC table included the following for NUREG-1431, Westinghouse plants:

NUREG-1431 LCO Condition	LCO and Condition Text/Description	Comments/ Notes

NUREG-1431 LCO Condition	LCO and Condition Text/Description	Comments/ Notes
3.3.1.DD	LCO: The RTS instrumentation for each Function in Table 3.3.1-1 shall be OPERABLE. Condition: One RTB train inoperable.	Treat as LOF.

Industry Question: As the Reactor Trip Breaker trains are independent and redundant, please explain why one inoperable RTB train would prevent the performance of the safety function.

We look forward to discussing these issues with the NRC staff.

Brian

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