
SUPPLEMENTAL RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

APR1400 Design Certification

Korea Electric Power Corporation / Korea Hydro & Nuclear Power Co., LTD

Docket No. 52-046

RAI No.: 507-8587
SRP Section: 16 – Technical Specifications
Application Section: 16 Technical Specifications
Date of RAI Issue: 08/01/2016

Question No. 16-171

Paragraph (a)(11) of 10 CFR 52.47 states that a design certification (DC) applicant is to propose Technical Specifications (TS) prepared in accordance with 10 CFR 50.36 and 50.36a. NUREG-1432, “Standard Technical Specifications (STS)-Combustion Engineering Plants,” Rev. 4, provides NRC guidance on format and content of technical specifications as one acceptable means to meet 10 CFR 50.36 requirements. Staff needs to evaluate all technical differences from standard TS (STS) NUREG-1432, STS Combustion Engineering Plants, Rev. 4, which is referenced by the DC applicant in DCD Tier 2 Section 16.1, and the docketed rationale for each difference because conformance to STS provisions is used in the safety review as the initial point of guidance for evaluating the adequacy of the generic TS to ensure adequate protection of public health and safety, and the completeness and accuracy of the generic TS Bases.

The Writer’s Guide for Plant-Specific Improved Technical Specifications (TSTF-GG-05-01) also provides guidance for the format and content of the TS. There are format and content differences between the DCD and the Writer’s Guide. These following corrections are necessary to ensure the completeness and accuracy of the TS and Bases.

In RAI 8057, Question 16-59, the staff inquired why the applicant was deviating from the Standard Technical Specifications (STS) as they pertained to TS 3.1.1 Shutdown Margin (SDM). The STS only has one TS for SDM and the applicant divided this TS into two based on Modes of Applicability, which would be 3.1.1 and 3.1.2.

In the response, the applicant stated that newly proposed TS 3.1.2 and its associated Bases would be incorporated into TS 3.1.1 and that TS 3.1.2 and its Bases would be deleted, thus aligning with the STS. The applicant also provided mark-up pages of the affected TS and Bases. Based on the mark-ups, the applicant proposes deleting TS 3.1.2 and marked the pages of TS 3.1.2 and its Bases as “RESERVED”, although there was no “RESERVED” designation on the Table of Contents pages for the TS and the Bases. This action would prevent the re-numbering of the sections following TS 3.1.2, i.e. sections 3.1.3 through 3.1.12.

Section 2.8.1.a of the Writer's Guide for Plant-Specific Improved Technical Specifications, which relates to Format Issues Related to Future License Amendments states "...Similarly, do not retain pages made blank by deletion of material by marking the page "Intentionally blank,"..."

The staff believes that the approach provided by the applicant is not correct for a DCD application. The TS for sections 3.1.3 through 3.1.12 should be re-numbered as appropriate following the deletion of proposed TS 3.1.2, and that a global check of the TS and Bases should be done to ensure that the re-numbering is properly captured in all aspects, including but not limited to:

- Table of Contents for both the TS and Bases
- Pages of the TS including:
 - Title
 - Subsection Title
 - LCO Statement
 - Upper right hand corner under the title
 - Surveillance Requirement Numbers
 - Page Numbers
- Pages of the Bases including
 - Title
 - Subsection Title
 - Upper right hand corner under the title
 - Page Numbers
- Pointers to these sections contained throughout the TS and Bases, such as
 - LCO 3.0.7
 - TS 5.6.3.a
 - TS 5.6.3.b.6

This global correction is required to ensure that the TS follow a correct order, vice having TS that go from 3.1.1 to 3.1.3 and thereafter, and not having a TS 3.1.2 at all. This would also align the APR1400 TS with the STS with the exception of APR1400 TS 3.1.9 through 3.1.12, due to the fact that TS 3.1.9 is a new proposed TS which alters the numbering of the TS after 3.1.9.

Response

KHNP performed a global check of the TS and Bases to ensure that properly ordering by renumbering of TS section 3.1.2 through 3.1.12 and the result will be incorporated in Rev. 1 of the Technical Specification such as attached example markup.

Supplemental Response

KHNP is submits the supplemental response to RAI 16-171. The supplemental response contains additional DCD section the numbers due to deletion of TS 3.1.2 for changing.

Impact on DCD

Same as changes described in Impact on Technical Specifications section.

Impact on PRA

There is no impact on the PRA.

Impact on Technical Specifications

Though the original response indicates future incorporation of DCD changes, the changes that were proposed in the original response to this RAI have been incorporated into Revision 1 of the DCD; therefore, only the pages containing changes proposed as a result of Revision 1 of this response are included in the Attachment.

Impact on Technical/Topical/Environmental Reports

There is no impact on any Technical, Topical, or Environmental Report.

3.0 LCO Applicability

3.1.9, 3.1.10 and 3.1.11



LCO 3.0.7 Special test exception (STE) LCOs in LCOs ~~3.1.10, 3.1.11 and 3.1.12~~ allow specified TS requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with STE LCOs is optional. When an STE LCO is desired to be met but is not met, the ACTIONS of the STE LCO shall be met. When an STE LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with the other applicable Specifications.

LCO 3.0.8 When one or more required snubbers are unable to perform their associated support function(s), any affected supported LCO(s) are not required to be declared not met solely for this reason if risk is assessed and managed, and:

- The snubbers not able to perform their associated support function(s) are associated with only one train or subsystem of a multiple train or subsystem supported system or are associated with a single train or subsystem supported system and are able to perform their associated support function within 72 hours, or
- The snubbers not able to perform their associated support function(s) are associated with more than one train or subsystem of a multiple train or subsystem supported system and are able to perform their associated support function within 12 hours.

At the end of the specified period, the required snubbers must be able to perform their associated support function(s), or the affected supported system LCO(s) shall be declared not met.