

NRR-DMPSPeM Resource

From: Chawla, Mahesh
Sent: Tuesday, December 12, 2017 1:28 PM
To: Davis, J.Michael (J.Michael.Davis@nexteraenergy.com); 'Probst, Jim';
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Cc: Kilby, Gary; Catron, Steve (Steve.Catron@fpl.com)
Subject: Second Round of Request for Additional Information - Duane Arnold Energy Center (DAEC) - LAR to Adopt TST-542, Revision 2, "Reactor Pressure Vessel Water Inventory Control" - CAC No. MF9829 (EPID: L-2017-LLA-0243)

By application dated June 9, 2017 (Agencywide Documents Access and Management System ADAMS Accession No. ML17164A076, and supplemented by letter dated November 1, 2017, (ADAMS) Accession No. ML17305A910, NextEra Energy, LLC (NextEra),(the licensee) requested to adopt Technical Specifications Task Force (TSTF) Traveler TSTF-542, "Reactor Pressure Vessel Water Inventory Control," Revision 2, which changes the Technical Specifications (TSs) for Duane Arnold Energy Center (DAEC).

The NRC issued a Request for Addition Information (RAI) (ADAMS Accession No. ML17277A365) to the licensee on October 4, 2017. In a letter dated November 1, 2017, NextEra Energy responded to these questions (ADAMS Accession No. ML17305A910). The NRC staff has completed its review of the RAIs and has additional questions related to the responses. The requested additional information is listed below:

DAEC-RAI-7

NRC Follow-up question to DAEC-RAI-1 response:

The markup pages provided on the RAI response letter of TS related to DRAIN TIME definition replaced "TAF" with "T.S. 2.1.1.3 Safety Limit;" however, as stated in RAI-1, the changes to TAF has global effects on the LAR including, but not limited to; TS LCO 3.5.2. For example, there are two places in TS LOC 3.5.2 that 'TAF' is noted.

Justify why these sections, including TS LCO 3.5.2, do not need to be modified, or make appropriate changes to all sections.

DAEC-RAI-8

NRC Follow-up question to DAEC-RAI-3 response:

Although TSTF-542 SR 3.5.2.8 and proposed DAEC SR 3.5.2.6 both test ECCS spray/injection subsystem function, they are not equivalent tests. The intent of TSTF-542 SR 3.5.2.8 is to verify that the required ECCS subsystem actuates on a manual initiation signal, including pump start and realignment of all valves to their required positions. Where a manual initiation push button and logic are not available, an alternative is required to meet the intent of this testing (i.e., to verify that the required ECCS spray/injection subsystem can be manually operated.) The proposed DAEC SR 3.5.2.6 requires testing the flow of water through the recirculation line, but does not require testing for operability of the injection valves.

Please provide the following: 1) Describe how verification of operability is obtained for the ECCS spray/injection subsystem valves, which are normally closed during Modes 4 and 5; and 2) Identify the SR in which the requirements are contained.

Please arrange a teleconference with the NRC staff to discuss the above requested information at your earliest possible. Thanks

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