

NRR-DMPSPeM Resource

From: Klos, John
Sent: Wednesday, January 24, 2018 10:02 PM
To: Elwood, Thomas B
Cc: Wink, Roger C; Brownawell, David R
Subject: Re: Request for Extension of Due Date for RAI Response

Follow Up Flag: Follow up
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Tom

I am writing to acknowledge the new due date for the RAI responses and confirm the new requested date for this action to be completed by the NRC as per below.

John Klos

On: 24 January 2018 17:07, "Elwood, Thomas B" <TELwood@ameren.com> wrote:

Mr. John Klos –

The attached Request for Additional Information was transmitted to Callaway (Ameren Missouri) on 10/31/2017 in regard to our license amendment request (LAR) for revising the FSAR description of Callaway's compliance with Regulatory Guide (RG) 1.106, Revision 1, "Thermal Overload Protection for Electric Motors on Motor-Operated Valves." The intent of the LAR, as you know, is to revise the FSAR to clarify how Callaway complies with RG 1.106 in regard to the control and/or bypassing of thermal overload protection (TOP) devices for motor-operated valves (MOVs) during routine testing/maintenance activities of such valves. The change would allow TOP devices to remain bypassed during certain routine valve stroke surveillance testing (such that the jumpers used for bypassing the TOP devices are not removed during such testing), which is not strictly in compliance with RG 1.106.

Five individual requests for information were included in the 10/31/2017 RAI, identified as EEOB RAI-1 through RAI-5. The due date for responding to the RAI was identified in the electronic RAI transmittal as January 24, 2018. A clarification telephone call was conducted on 10/26/2017 to discuss the individual RAIs, prior to transmittal. A final draft response to the RAI was recently completed and reviewed by Engineering and Regulatory Affairs personnel, in anticipation of submitting the response on or by the current due date. However, during final sign-off of the RAI response and transmittal letter, a question came up in regard to whether some additional information should be included in the RAI response, specifically in regard to RAI-2 and RAI-5. Together, these RAIs concern identification of the types of tests during which TOP devices are bypassed, the number of times that safety-related MOVs are stroked per plant operating cycle due to those tests, and the number of times that a stroke test resulted in acceptance criteria not being met (such that the failure involved motor degradation or damage, in the last five years. In response to these requests/questions, the draft RAI response (as currently completed) does identify the types of tests involved, including valve stroke/exercise tests, valve stroke time tests, valve position indication tests, local leak rate tests, system flow tests, response time tests, interlock tests, etc. However, in connection with such testing, a question was identified in regard to whether logic actuation tests should be included in the scope since those tests (which are mainly driven by instrumentation TS requirements and not valve test requirements per se) may involve the stroking of valves. Upon further discussion, including the phone calls conducted today, it was determined that the actuation logic tests should be included in the scope of the responses to the noted RAIs. Doing so, however, requires extensive, further investigation (review of test records, test procedures, etc.). This extra effort was deemed necessary, as it was noted, for example, that including these tests in the scope will likely affect the number provided for the total number of times that

safety-related MOVs are stroked per plant operating cycle due to such testing. It was thus determined that an extension of the due date for responding to the NRC's 10/31/2017 RAI should be requested.

Based on the above, it is hereby requested that the due date for responding to the noted RAI be extended from January 24, 2018 to February 9, 2018, as discussed on the telephone today. This should allow sufficient time to complete the needed research and records review and to incorporate the additional information into the draft RAI response. Since the requested date for NRC approval of the LAR was identified as 4/6/2018 in the original LAR request (Ameren Missouri Letter ULNRC-06331 dated April 6, 2017), it is understood that this extension could impact the schedule for issuing the license amendment ((if approved). As far as Callaway is concerned, approval by April 6, 2018 is not urgent or required, as there is no pressing plant issue or concern behind the originally requested approval date. Approval any time in April, for example, would certainly be acceptable.

A e-mail and/or electronic response/acknowledgment in regard to this request is anticipated (and appreciated) based on today's discussion. Thank you for your assistance in this matter.

- Tom Elwood, Supervising Engineer – Regulatory Affairs and Licensing

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From: Klos, John

Created By: John.Klos@nrc.gov

Recipients:

"Wink, Roger C" <RWink@ameren.com>
Tracking Status: None
"Brownawell, David R" <DBrownawell@ameren.com>
Tracking Status: None
"Elwood, Thomas B" <TElwood@ameren.com>
Tracking Status: None

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