

A	2018-01-22 SE Section No.	2018-01-22 SE Page No.	2017-11-09 Draft SE Page No.	Draft Paragraph No.	2017-11-28 DRAFT SE Comment	Proposed Revised Statement	2018-01-22 SE Statement	Comment
18	3.1.1.2	33	34	bullet list	<p>One section should be added to this list: section 3.3.6. Ref 12 provided a table of sections that need to be changed from "Complies with Clarification" to either "Complies" or "Complies with use of EEEE". Ref 14 provided an update to that table – Table 5b.01. The third item is Section 3.3.6 with a compliance statement of "Complies with Use of EEEE – Functionally Equivalent."</p> <p>Other sections classified like this are given an explanation in the draft SER, confirming that the EEEE demonstrates the basis for being acceptable.</p>	<p>"NFPA 805, Section 3.3.6 requires that metal roof deck construction shall be designed and installed so the roofing system will not sustain a self-propagating fire on the underside of the deck when the deck is heated by a fire inside the building. Roof coverings shall be Class A as determined by tests described in NFPA 256, "Standard Methods of Fire Tests of Roof Coverings"</p> <p>In FPE RAI 05b (Reference 23), the NRC staff requested the licensee to review all "Compliance with Clarification" compliance statements and ensure that the strategy is suitable for the condition. In its response to FPE RAI 05b (Reference 12), the licensee stated that the compliance statement for NFPA 805, Section 3.3.6 will be revised to "Complies" and/or "Complies with Use of EEEE." In FPE RAI 05.02(a) (Reference 26), the NRC staff requested that the licensee identify if the NFPA 805, Chapter 3, compliance statement is either "Complies" or "Complies with Use of EEEE" and provide the compliance bases. In its response to FPE RAI 05.02(a) (Reference 14), the licensee stated that it "Complies with Use of EEEE" with the NFPA 805, Section 3.3.6 requirement and revised the compliance basis. The NRC staff concludes that the licensee's response to FPE RAI 05b and FPE RAI 05.02(a) are acceptable because the licensee revised the compliance statement and basis to meet the NFPA 805 requirement, which is also in accordance with the guidance contained in RG 1.205 and NEI 04-02 for the use of EEEEs."</p>	N/A	<p>NFPA 805 Section 3.3.6 needs to be added to SER Section 3.1.1.2 "Compliance Strategy - Complies with Clarification" on the bottom of SER page 33.</p> <p>Additionally, a paragraph needs to be added on SER page 35 regarding NFPA 805 Section 3.3.6 (Similar to NFPA 805 Section 3.5.10 on SER page 37). In FPE RAI 05b, it was stated that the compliance statement for NFPA 805 Section 3.3.6 will be revised to "Complies" and/or "Complies with Use of EEEE." In response to FPE RAI 05.02(a), it was stated that "Complies with Use of EEEE" is used for NFPA 805 Section 3.3.6.</p>
19	3.1.1.2	35	36	1	<p>A follow-up RAI was issued regarding NFPA 805 Section 3.3.5.3 (FPE RAI 04.01 L-15-371 ML15356A136), with the response stating that approval will be requested as an Attachment L Item. The Attachment L Item was submitted as Approval Request 6. (L-16-058 ML16055A160).</p> <p>This should be updated to reflect the Approval Request, which is identified in SE Section 3.1.4.6</p> <p>See SE page 194 for same comment.</p>	<p>Add: In FPE RAI 04.01 (Reference 25), the NRC staff stated in the engineering evaluation, the licensee concluded that the low population of cables that do not meet Institute of Electrical and Electronics Engineers (IEEE) Standard 383, 1974 Edition, or equivalent, were considered in the fire modeling evaluation and determined to be adequate for the hazard. In accordance with FAQ 06-0008, this type of EEEE cannot be self-approved by the licensee. In its response to FPE RAI 04.01 (Reference 14), the licensee stated that the compliance strategy for NFPA 805 Section 3.3.5.3, for the low population of cables with potentially non-qualified electrical cable insulation material installed in electrical raceways at BVPS-1 and BVPS-2 will be revised to "Submit for NRC Approval"</p>	<p>N/A: The licensee further stated that the cables installed were compared to IEEE-383, which is a recognized flame propagation test accepted in FAQ 06-0022 (Reference 74). The licensee further stated that the engineering analysis determined that the majority of the electric cables used within the power block are equivalent to the requirements of NFPA 805, Section 3.3.5.3, and the low population of electric cables with potentially nonqualified electric cable insulation materials installed in electrical raceways is acceptable. The NRC staff concludes that the licensee's response to the RAI is acceptable because the licensee demonstrated that it used engineering evaluations to compare its cable installations against the criteria of NFPA 805 and the guidance of FAQ 06-0022 and determined that the insulation materials are acceptable.</p>	<p>Omitting the "proposed revised statement" does not align with the NRC staff position during the RAI responses. The NRC staff did not accept the EEEE "Adequate for the Hazard" conclusion, hence the follow-up FPE RAI 04.01 and the need to issue the Attachment L request for Section 3.3.5.3. However, the Attachment L request is described in Section 3.1.1.5 and 3.1.4.6, but these sections now do not align with what Section 3.1.1.2 states. Note that the other NFPA 805 Chapter 3 sections described in 3.1.1.2 that initially performed a EEEE for the first round RAI response and subsequently changed to an Attachment L Request for Approval in the second round RAI response, and are all accurately described.</p>
28	3.1.1.4	50	52	3rd Sub-Bullet	<p>Fire Compartments 2-PT-1, 2-SG-1S are not listed, but were identified in the FPE RAI 02 Table for NFPA 805 Section 3.11.3.</p>	<p>In LAR Attachment A, the licensee stated that in fire compartments 2-PT-1, 2 SB 1, 2 SB 2, 2 SB 3, 2 SB 4, 2 SB 5, 2 SB 6, 2 SB 7, 2 SB 8, 2 SB 9, 2-SG-1S, 2 WH 1, and 3 CR 1</p>		<p>Both 2-PT-1 and 2-SG-1S were added, but 2-SB-3 was removed. 2-SB-3 should not have been removed.</p>
48	3.2.1.4	108	111	4	<p>The "RHR" abbreviation is ambiguous in this context: recommend this be clarified to distinguish between the RHR Valve and the RHR System. The RHR System is not credited for Hot Standby, while the RHR Valve is an alternative to the atmospheric dump valves.</p>	<p>...The licensee stated that decay heat is removed by use of a natural circulation cooldown and steam release by the main steam safety valves and manual operation of atmospheric dump valves or RHR valve and that AFW is credited to supply cooling water to the SGs...</p>	<p>The licensee stated that decay heat is removed by use of a natural circulation cooldown and steam release by the main steam safety valves and manual operation of atmospheric dump valves or RHR and that AFW is credited to supply cooling water to the SGs.</p>	<p>To prevent confusion in future inspections, FENOC recommends that "valve" be added after "RHR" as follows: "...atmospheric dump valves or RHR [valve] and that AFW...". This would make it consistent with "Decay Heat Removal" on page 111 of the SE.</p>

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100	3.5.1.3	188	194	2	<p>A follow-up RAI was issued regarding NFPA 805 Section 3.3.5.3 (FPE RAI 04.01 L-15-371 ML15356A136), with the response stating that approval will be requested as an Attachment L Item. The Attachment L Item was submitted as Approval Request 6. (L-16-058 ML16055A160).</p> <p>This should be updated to reflect the Approval Request, which is identified in SE Section 3.1.4.6</p> <p>See SE pages 35/36 for same comment.</p>	<p>Replace with: In FPE RAI 04.01 (Reference 25), the NRC staff stated In the engineering evaluation, the licensee concluded that the low population of cables that do not meet Institute of Electrical and Electronics Engineers (IEEE) Standard 383, 1974 Edition, or equivalent, were considered in the fire modeling evaluation and determined to be adequate for the hazard. In accordance with FAQ 06-0008, this type of EEEE cannot be self-approved by the licensee. In its response to FPE RAI 04.01 (Reference 14), the licensee stated that the compliance strategy for NFPA 805 Section 3.3.5.3, for the low population of cables with potentially non-qualified electrical cable insulation material installed in electrical raceways at BVPS-1 and BVPS-2 will be revised to "Submit for NRC Approval."</p>	<p>In FPE RAI 04a and FPE RAI 04c (Reference 23), the NRC staff requested that the licensee provide an approval request in accordance with 10 CFR 50.48(c)(2)(vii) that describes the PB approach to compliance with NFPA 805, Section 3.3.5.3, for which NRC approval is requested or revise the compliance basis. In its response to FPE RAI 04a and FPE RAI 04c (Reference 12), the licensee stated that LAR Attachment K, as supplemented, Licensing Action 27 is not required, and an engineering evaluation was performed that analyzed the low population of cables with potential nonqualified electric cable insulation material installed in electrical raceways and determined the configuration to be acceptable, and removed the compliance statement "Submit for NRC Approval."</p>	<p>Omitting the "proposed revised statement" does not align with the NRC staff position during the RAI responses. The NRC staff did not accept the EEEE "Adequate for the Hazard" conclusion, hence the follow-up FPE RAI 04.01 and the need to issue the Attachment L request for Section 3.3.5.3.</p> <p>However, the Attachment L request is described in Section 3.1.1.5 and 3.1.4.6, but these sections now do not align with what Section 3.1.1.2 states. Note that the other NFPA 805 Chapter 3 sections described in 3.1.1.2 that initially performed a EEEE for the first round RAI response and subsequently changed to an Attachment L Request for Approval in the second round RAI response, are all accurately described.</p>
New	4	224	N/A	N/A	N/A	<p>The last sentence before Section 5 begins should be "... which are to be completed by the end of the second Unit 2 refueling outage after issuance of the safety evaluation."</p>	<p>The sentence in this section of the SE currently says "... Unit 1 (2)...."</p>	<p>The email from Booma Venkataraman (NRC) to Phil Lashley (FENOC) sent on 12-11-17 had the correct proposed transition license condition.</p>