

Holonich, Joseph

From: Gregg Ellis <ellisg7@att.net>
Sent: Thursday, June 28, 2018 10:07 AM
To: Lappert, Glenna
Cc: Holonich, Joseph
Subject: [External_Sender] Industry Operability Public meeting on IMC 0326 Revision - Comment on Section 3.8 NEI 18-03

For NEI and NRC to consider:

There are a number of Technical Specification LCOs requiring equipment to be Operable that do not have specified safety functions explicitly defined in Chapter 6 or 15 of the FSARs. These typically are listed in their respective Bases as meeting either 10 CFR 50.36 Criterion 1 or 4.

e.g., RCS leakage detection instrumentation is required to be Operable but is not a system assumed in Chapter 15 safety analyses and is discussed in Chapter 7 not Chapter 6. However, the STS Bases describes in the "Applicable Safety Analysis" section the reason the equipment is in Tech Specs, which is the "safety function" that it must perform to be considered Operable. As such, explicit specified safety functions are defined in the Tech Spec Bases not the FSAR. Similarly, systems like BWR RCIC, and RHR SDC or DHR systems also do not have safety basis tied to FSAR Chapter 6 or Chapter 15.

Example: RHR shutdown cooling/decay heat removal requirements. These specifically are not listed for mitigation in the safety analysis.. therefore, how can these systems ever be "Operable?" Per STS NUREG-1433 Vol. 2, TS 3.4.9 Applicable Safety Analysis section ... the purpose of this specification is "Decay heat removal is, however, an important safety function that must be accomplished or core damage could result." The background section further clarifies "This decay heat must be removed to maintain the temperature of the reactor coolant $\leq 200^{\circ}\text{F}$." So, there is a "specified safety function" for this RHR SDC... to be capable of removing decay heat to maintain temperature of the reactor coolant less than the required temperature to avoid core damage.

An additional example is BWR Source range monitoring requirements. These instruments specifically are not listed with a safety function.. therefore, how can these instruments ever be "Operable?" Per STS NUREG-1433 Vol. 2, TS 3.3.1.2 Applicable Safety Analysis section ... the purpose of this instrumentation is "...the SRMs provide the only on scale monitoring of neutron flux levels during startup and refueling." As a result, the specified safety function is to "provide on scale monitoring of neutron flux levels."

Please note: For non-ITS plants, which do not have Bases consistent with STS, this would have to be clarified in another manner. I have no suggestions for these old, outdated, plants.

For reasons described above: Please consider refining the definition to explicitly tie "Specified Safety function" in Section 3.8 (and IMC 0326) to the "Applicable Safety Analysis" section of the Tech Spec Bases. This section will ultimately lead one to the applicable FSAR and other licensing basis documents (References specified in the Bases) further defining the specified safety functions and will also avoid confusion on "Operability" related to Tech Spec equipment that has no explicitly defined safety function the respective FSARs.

Sincerely;

Gregg Ellis - OWNER

407-920-6187

ellis-TEC@att.net

Ellis TEC, LLC