

Vogle PEmails

From: Hoellman, Jordan
Sent: Tuesday, July 17, 2018 2:53 PM
To: Vogle PEmails
Subject: SNC Comments on Proposed License Condition for Critical Sections
Attachments: RAI LAR-17-037-2 - Updated Feedback from Public Call (7-16).pdf

Please see SNC's comments and revisions to the updated version of the proposed license condition for Critical Sections for discussion at a future public meeting. The text that is changed from the version provided last Thursday (7/12/2018) is highlighted in yellow, and a discussion of the basis for each change is provided in italicized text below each change.

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Feedback from Public Call re: RAI LAR-17-037-2

Criterion 1 would remain as originally proposed in LAR-17-037 (except that construction would be changed to structural, as per and earlier SEB comment):

1. Involve design methodology or ~~construction structural construction~~ materials that deviate from a code or standard credited in the plant-specific DCD for establishing the criteria for the design or construction of a structure, system, or component (SSC) important to safety,

Basis for change: Initially, this said “construction materials,” but we changed it to “structural materials” to accommodate the SEB aspects of materials; however, since structural materials will be addressed in the new sub-criterion below, Criterion 1 should be returned to refer to “construction material.”

A new criterion (2 or 7) would be added as follows:

Proposed (SNC) wording:

- Involve ~~analysis methods or design methodology~~ analytical or design methods, including design codes, analytical assumptions, or structural materials, that deviate from those credited in the plant-specific DCD for critical sections,

Basis for change: Staff indicated the use of one term (i.e., either methods or methodology) would be preferable. We opted to go with the combined phrase, “analytical or design methods,” in response to this comment.

- Result in a change to the design of the steel faceplates, internal trusses, tie bars, or headed studs of the steel-concrete (SC) module walls in the Nuclear Island or Shield Building ~~(excluding attachments or appurtenances)~~, including SC-to-reinforced concrete (RC) connections,

Basis for change: Staff indicated the parenthetical text “(excluding attachments or appurtenances)” was too broad, and could allow the attachment of anything to the walls. So, instead of trying to defining what should be addressed in this exclusion, we felt it would be more straight-forward to define what constitutes the SC module walls. The constituents of these wall are “steel faceplates, internal trusses, tie bars, and headed studs.” So, we suggest rewording this sub-criterion to include these items.

- Result in a change to the demand to capacity ratio (area of steel provided to that specified in the plant-specific DCD) of a critical section of the structure that when analyzed using local demand and actual steel values exceeds the ratio values stated in or calculated from UFSAR Section 3.8 and Appendix 3H Tables Tier 2* values for the applicable structural member,

Basis for no change: Staff indicated wording that would be considered acceptable could be found in a bullet in the summary of the June 7-8 audit. We considered the text in this bullet, and determined that the D/C ratio definition provided in this bullet does not provide SNC any of the flexibility requested by this sub-criterion. We were not certain of exactly why the staff objected to the wording provided by SNC in this bullet. If the objection was based on the use of the term “local” in this sub-criterion, we would like to discuss how we addressed the use of this term in our draft RAI response dated 6/12/18. If there is some other concern, we would also like to discuss that to better understand the staff’s concern.