

NRR-DMPSPEm Resource

From: Chawla, Mahesh
Sent: Tuesday, September 11, 2018 4:24 PM
To: Davis, J.Michael (J.Michael.Davis@nexteraenergy.com)
Cc: Catron, Steve (Steve.Catron@fpl.com); Probst, Jim; Kilby, Gary; 'laura.swenzinski@nexteraenergy.com'; Murrell, Bob (Bob.Murrell@nexteraenergy.com); Weaver, Tracy
Subject: Draft Second Round - Request for Additional Information (RAI) - Duane Arnold Energy Center (DAEC) - LAR TSCR-166, Adoption of EAL Scheme Pursuant to NEI 99-01 - EPID L-2017-LLA-0420

Dear Mr. Davis,

By letter dated December 15, 2017, NextEra Energy Duane Arnold LLC (the licensee) requested approval for an emergency action level (EAL) scheme change for Duane Arnold Energy Center (DAEC) (Agencywide Documents Access and Management System (ADAMS) Accession ML17363A067 [package]). On June 15, 2018, NRC sent a draft request for additional information (RAI) via an email (ADAMS Accession No. ML18166A298). In a letter dated July 26, 2018 (ADAMS Accession No. ML18212A2050), NextEra provided a supplemental response to the subject RAIs.

DAEC's response to RAI-DAEC-8, for the Loss of Fuel Clad Barrier threshold, was based on the Developer Notes for BWR Fuel Clad Barrier Threshold 4 (page 86) of NEI 99 01, Revision 6, which provides that 300 $\mu\text{Ci/gm}$ dose equivalent I-131 should be above the level that is expected for 2% to 5% clad damage. However, for DAEC, 300 $\mu\text{Ci/gm}$ dose equivalent I-131 is equivalent to approximately 8% clad damage. As such, this value is not consistent with an accurate EAL assessment.

During a subsequent RAI clarification call, the NRC staff provided clarification that NEI 99-01, Revision 6, provides generic guidance that may not align with site specific values and that DAEC should use site specific values as needed to respond to RAI-DAEC-8. The staff further provided that a supplement to the LAR should include a justification for using site specific values that are different from the generic guidance provided by NEI 99 01, Revision 6.

To facilitate a timely and accurate response, a revised RAI is provided. Although the requested action remains the same for the loss of the Fuel Clad Barrier, the RAI was revised to reflect both the DAEC response to DAEC-RAI-8 as well as a subsequent RAI clarification call.

RAI-DAEC-8 (revised)

The proposed value for the Potential Loss of Fuel Clad Barrier threshold is based on the guidance provided by NEI 99-01, Revision 6, and is not based on site-specific conditions. Section 3.3, "NSSS Design Differences," of NEI 99-01, Revision 6, provides that, "Developers will need to consider the relevant aspects of their plant's design and operating characteristics when converting the generic guidance of this document into a site-specific classification scheme."

Please verify that the Loss of the Fuel Clad Barrier threshold value for the Drywell and Torus radiation monitors, based on a loss of the reactor coolant system resulting in approximately 2% to 5% clad damage, considers the site-specific aspects of the DAEC design and operating characteristics. If the fuel clad barrier threshold value is not based on DAEC site-specific values, revise the proposed fuel clad barrier threshold value to align with site-specific values.

Please arrange another teleconference with the NRC staff to discuss this information. In case of any questions, please contact me. Thanks

Mahesh Chawla

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