NRR-DMPSPEm Resource

From: Chawla, Mahesh
Sent: Monday, October 15, 2018 3:14 PM
To: Schultz, Eric
Cc: Kilby, Gary; Catron, Steve (Steve.Catron@fpl.com); Manthei, Scott
Subject: Final Request for Additional Information - License Amendment Request 288 to Extend Containment Leakage Rate Test Frequency for Point Beach Nuclear Plant, Units 1 and 2 - EPID L-2018-LLA-0097

Dear Mr. Shultz,

By application dated March 30, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18092A239) NextEra Energy Point Beach, LLC (NextEra), the licensee, requested changes to the Technical Specifications (TS) for Point Beach Nuclear Plant, Units 1 and 2 (hereafter PBNP). The proposed change would permit on a permanent basis, the existing Containment 10 CFR 50 Appendix J Type A test (ILRT) intervals to be extended from 10 years to 15 years and the Type C test, LLR containment isolation valves (CIVs) to be extended from 60 months up to 75 months. The Nuclear Regulatory Commission (NRC) staff has reviewed the license amendment request (LAR) and determined that following additional information is needed in order to complete the review.

REQUEST FOR ADDITIONAL INFORMATION

PRA RAI 01 – Addition of FLEX into the PRA Models

In order to meet certain NRC regulations and orders (such as NRC Order EA-12-049, "Issuance of Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," issued after the Fukushima Dai-ichi accident), licensees have developed and integrated mitigating strategies into plant operations including Diverse and Flexible Coping Strategies (FLEX). As these changes are implemented, licensees are starting to incorporate these new strategies into their PRA models.
The Staff has identified several challenges to incorporating these new strategies into PRA models. The NRC memorandum dated May 30, 2017, "Assessment of the Nuclear Energy Institute 16-06, 'Crediting Mitigating Strategies in Risk-Informed Decision Making,' Guidance for Risk-Informed Changes to Plants Licensing Basis" (ADAMS Accession No. ML17031A269), provides the NRC's staff assessment of challenges to incorporating FLEX equipment and strategies into a PRA model in support of risk-informed decision making in accordance with the guidance of RG 1.200.
In order for the staff to complete it's review, please provide the following information:

1. Clarify whether mitigating strategies (i.e., FLEX) are incorporated into the PRA models (e.g., internal events PRA, fire PRA, etc.) that are used in this LAR. If so,
    a. Confirm that plant-specific data is used to develop the failure probabilities.
    b. Describe the human reliability analysis (HRA) methods used.

2. Alternatively, state that FLEX does not have an impact on the CDF and LERF for this LAR.

SCPB RAI-1

REGULATORY BASIS
10 CFR 50, Appendix J, Option B, Section V.B.3, requires that the RG or other implementation document used by a licensee to develop a performance-based leakage-testing program be included, by general reference, in the plant TSs.

Point Beach Nuclear Plant, Units 1 and 2 Technical Specification 5.5.15, “Containment Leakage Rate Testing Program,” currently invokes as its implementation documents both:

- Regulatory Guide 1.163, "Performance-Based Containment Leak Test Program," dated September 1995
- NEI 94-01, Rev. 0, Industry Guidance for Implementing Performance Based Option of 10 CFR 50, Appendix J

ISSUE

LAR Section 3.1.2, “Type B and Type C Testing,” states, in part:

2

> For Type B testing, 5 penetrations for Unit 1 and 6 penetrations for Unit 2 are currently on extended frequency. For both Units 1 and 2, two penetrations (each) are tested when the penetrations are opened. If these penetrations are not opened for multiple outages, the penetrations are eligible for extended frequency testing. Measured leakage for these penetrations has not changed significantly over 120 months.

“Table 1 - Extended Frequency Percentages” of LAR Section 3.1.2 indicates that there are 13 total Type B Penetrations for Unit 1 and 14 total Type B Penetrations for Unit 2.

From the information and data available in the LAR and PBNP UFSAR, the staff cannot accurately interpret the “% Extended” (i.e., 38.5% Unit 1; 42.9% Unit 2) data contained in Table 1. In particular, for Unit 1 are there six (i.e., 13 – 5 – 2) containment Type B penetrations not on an extended test intervals because of: (a) Type B test failures or (b) these six penetrations are opened each refueling outage and therefore not eligible for extended test intervals. Similarly, for Unit 2 are there six (i.e., 14 – 6 – 2) containment Type B penetrations not on an extended test intervals because of: (a) Type B test failures or (b) these six penetrations are opened each refueling outage and therefore not eligible for extended test intervals.

REQUEST

For an established Appendix J, Option B, LLRT program with a sufficient historical base, the percentage of Type B or Type C components on repetitive frequencies can indicate the quality of the maintenance program and corrective action process.

Provide the following information for PBNP Units 1 and 2:

- The total number (i.e., population) and percentage of the total number of eligible PBNP Type B tested components currently on a 120-month extended performance-based test interval
- The total population of electrical penetrations each in Unit 1 and in Unit 2.

On October 10, 2018, during a teleconference with the NRC staff for further clarification, the licensee understood the requested information and stated that no additional clarification on the RAI was necessary. Gary Kilby from NextEra subsequently informed NRC that the licensee agreed to provide a response to this **final** RAI by November 16, 2018. The NRC staff also informed the licensee that a publicly available version of this final RAI would be placed in ADAMS. Thanks

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