

Vogle PEmails

From: Hoellman, Jordan
Sent: Wednesday, January 9, 2019 12:32 PM
To: Vogtle PEmails
Subject: Topic for 1/10/19 Public Meeting (LAR 18-028)
Attachments: Vogtle LAR 18-028 Clarification Questions-1-8-19.docx

Draft clarification questions regarding LAR 18-028, Routing of Class 1E Divisional Cables Supporting Passive Containment Cooling, for discussion at the 1/10/2019 public meeting with SNC.

From: Hoellman, Jordan
Sent: Tuesday, January 08, 2019 3:09 PM
To: Chamberlain, Amy Christine <ACCHAMBE@southernco.com>
Cc: Hearn, Peter <Peter.Hearn@nrc.gov>; Patel, Chandu <Chandu.Patel@nrc.gov>; Grant, Eddie <X2EDGRAN@SOUTHERNCO.COM>; Haggerty, Neil <X2NHAGGE@SOUTHERNCO.COM>; Lawhorn, Rufus L. <RLLAWHOR@southernco.com>; Sparkman, Wesley A. <WASPARKM@southernco.com>; Agee, Stephanie Y. <SYAGEE@southernco.com>; Otto, Ngola <Ngola.Otto@nrc.gov>; Fitzpatrick, Robert <Robert.Fitzpatrick@nrc.gov>; Lavera, Ronald <Ronald.LaVera@nrc.gov>; Ashley, Clinton <Clinton.Ashley@nrc.gov>; Vettori, Robert <Robert.Vettori@nrc.gov>; Stutzcage, Edward <Edward.Stutzcage@nrc.gov>
Subject: RE: RE: Topic for 1/10/19 Public Meeting (LAR 18-028)

Hi Amy,

Attached are the clarification questions we'd like to discuss with you at Thursday's public meeting.

Please let us know if you can support the discussion.

Thanks,
Jordan

From: Hoellman, Jordan <Jordan.Hoellman2@nrc.gov>
Sent: Monday, January 7, 2019 2:39 PM
To: Chamberlain, Amy Christine <ACCHAMBE@southernco.com>
Cc: Hearn, Peter <Peter.Hearn@nrc.gov>; Patel, Chandu <Chandu.Patel@nrc.gov>; Sparkman, Wesley A. <WASPARKM@southernco.com>; Agee, Stephanie Y. <SYAGEE@southernco.com>; Arafah, Yasmeen N. <YNARAFEH@southernco.com>
Subject: Topic for 1/10/19 Public Meeting (LAR 18-028)

EXTERNAL MAIL: Caution Opening Links or Files

Hi Amy,

The staff has some clarification questions regarding LAR 18-028, Routing of Class 1E Divisional Cables Supporting Passive Containment Cooling, that we'd like to discuss at this week's public meeting. I should be able to provide you with the questions tomorrow morning.

Can SNC support this clarification discussion at this week's public meeting? I understand that you may not be able to answer until you see the questions. I'll provide them to you ASAP.

Thanks,
Jordan

Jordan Hoellman

Project Manager

Licensing Branch 4

Division of Licensing, Siting, and Environmental Analysis

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Subject: Topic for 1/10/19 Public Meeting (LAR 18-028)
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Received Date: 1/9/2019 12:32:03 PM
From: Hoellman, Jordan

Created By: Jordan.Hoellman2@nrc.gov

Recipients:
"Vogtle PEmails" <Vogtle.PEmails@nrc.gov>
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MESSAGE	2740	1/9/2019 12:32:03 PM
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Priority: Standard
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Vogle Units 3 and 4 LAR 18-028 Draft Clarification Questions

General Clarification Questions

1. Does the LAR 18-028 make changes to the containment barrier (i.e., penetrations)?
2. Does the LAR 18-028 make changes (e.g., ducting, dampers) to ventilation systems?

Draft Clarification Question 1

In LAR, Section 4.1, "Applicable Regulatory Requirements/Criteria," related to 10 CFR Part 50, Appendix A, "General Design Criteria for Nuclear Power Plants," General Design Criterion (GDC) 2, *Design basis for protection against natural phenomena*, states that the changes to the routing of Class 1E cables provide for protection from natural phenomena by routing the cables within the shield building structure, and through fire areas with environments for which the cables are qualified.

LAR 18-028 also states the following:

1. This change proposes to reroute Class 1E cables that support PCS components within the auxiliary building.
2. The rerouted cable raceways design follows the environmental conditions for the environmental zones through which the cables are to be routed. The raceways penetrate through the shield building below the connection between the shield building and the auxiliary building roof.
3. The changes to the raceways resulted in sixteen new electrical penetrations through the concrete between the shield building annulus and the auxiliary building in Rooms 12501 and 12506.

Question:

The staff is requesting clarification as to why there is no specific mention of the auxiliary building in addition to what is described about the shield building in the discussion about whether compliance with GDC 2 is maintained.

Draft Clarification Question 2

10 CFR Part 50, Appendix A, "General Design Criteria for Nuclear Power Plants," General Design Criterion (GDC) 4 requires that SSCs important to safety be designed to withstand the envelope of environmental conditions possible where the equipment is located under all conditions. Updated Final Safety Analysis Report (UFSAR) Chapter 8, Table 8.1-1, "Criteria and Guidelines for Electric Power Systems," indicated that GDC 4 is applicable to Section 8.3.2, "DC Power Systems," which is comprised of independent Class 1E and non-Class 1E dc power systems.

LAR 18-028 states the following:

1. The rerouted cable raceways design continues to meet the environmental conditions for the environmental zones in the auxiliary building through which the cables are to be routed. The raceways penetrate through the shield building below the connection

Vogtle Units 3 and 4 LAR 18-028 Draft Clarification Questions

between the shield building and the auxiliary building roof. Penetrations through the shield building cylindrical wall do not provide a straight-through radiation stream path towards the outside or to the Main Control Room (MCR).

2. The cables continue to be qualified for the environments of the rooms through which they are proposed to be routed, and no changes are proposed to the cable design. The routing of the pertinent cables does not change the function of the related systems, and thus, the changes do not introduce a new failure mode, malfunction or sequence of events that could adversely affect safety or safety-related equipment. Therefore, the proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

Question:

Staff is requesting clarification as to why GDC 4 is not mentioned or evaluated in the LAR.

Draft Clarification Question 3 - Fire Area 1201 AF 02

In LAR Section 3, states that there is a Division D conduit that traverses Fire Area 1201 AF 02, the cables in this conduit are associated with the main control room (MCR)/remote shutdown room (RSR) transfer switch function. The habitability of the MCR is not affected by a postulated fire in this zone and the affected cables cannot cause or prevent Division D components from functioning.

Updated Final Safety Analysis Report (UFSAR) Subsection 9A.3.1.2.2.1 markup provided in LAR 18-028 states in part that for a fire event, the division A, C, and D components identified in UFSAR Table 9A-2 are sufficient to achieve and maintain safe shutdown.

Questions:

1. Staff is requesting clarification as to whether there are Division D components other than the Division D conduit associated with the main control room (MCR)/remote shutdown room (RSR) transfer switch function.
2. Staff is requesting clarify as to whether the statement “a postulated fire in Fire Area 1201 AF 02 cannot cause or prevent Division D components from functioning,” only applies to the Division D conduit associated with the main control room (MCR)/remote shutdown room (RSR) transfer switch function.

Draft Clarification Question 4 - Fire Area 1242 AF 02

In Section 3, of the LAR the licensee proposed to add Class 1E IDS Division A and C cables in Fire Area 1242 AF 02 due to the revised routing of the Class 1E cables.

Question:

1. Staff is requesting clarification as to whether the rerouting of Class 1E cables adds Division C cables only or both Division A and C cables in this fire area.