

NRR-DMPSPEm Resource

From: Williams, Shawn
Sent: Wednesday, March 13, 2019 10:51 AM
To: MOORE, MICHAEL S
Cc: DALICK, SARA BETH ; JUSTIN.BOUKNIGHT@scana.com
Subject: Virgil C. Summer Nuclear Station, Unit No. 1 – Request for Additional Information RE: LAR-16-01490 NFPA-805 Program Revisions (EPID No. L-2018-LLA-0233)
Attachments: Summer Post NFPA 805 RAIs.docx

Dear Mr. Moore,

By letter dated August 29, 2018 (Agencywide Documents Access and Management System Accession No. ML18242A658) South Carolina Electric & Gas Company (SCE&G) requested changes to the Operating License for the Virgil C. Summer Nuclear Plant, Unit 1.

The proposed amendment would revise license conditions and approve the following:

- Changes to plant modifications evaluated using fire probabilistic risk assessment methods and approaches that have been previously accepted in Amendment No. 199 or that have been accepted for another nuclear power plant station .
- Approval of Performance-Based Alternatives for Chapter 3, NFPA 805 (10 CFR 50.48(c)(2)(vii))
 - NFPA 805 Section 3.3.4, Insulation Materials
 - NFPA 805 Section 3.3.5.1, Wiring above Suspended Ceilings

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed the submittal and determined that additional information is needed to complete its review as discussed in the attachment. During a clarification call on March 13, 2019, Mr. Bouknight, of your staff agreed that SCE&G would respond within 45 days of the date of this e-mail. Please note that the NRC staff's review is continuing and further requests for information may be developed.

If you have any questions, please contact me at 301-415-1009 or Shawn.Williams@nrc.gov.

Sincerely,
Shawn A. Williams, Senior Project Manager
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No.: 50-395

Enclosure: Request for Additional Information

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Sent Date: 3/13/2019 10:51:03 AM
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From: Williams, Shawn

Created By: Shawn.Williams@nrc.gov

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REQUEST FOR ADDITIONAL INFORMATION

LICENSE AMENDMENT REQUEST TO REVISE

NATIONAL FIRE PROTECTION ASSOCIATION STANDARD 805 FIRE PROTECTION PROGRAM

VIRGIL C. SUMMER NUCLEAR STATION, UNIT NO. 1

DOCKET NO. 50-395

By letter dated August 29, 2018 (Agencywide Document Access and Management System (ADAMS) Package Accession No. ML18242A657), South Carolina Electric and Gas (SCE&G), submitted a license amendment request (LAR) for the Virgil C. Summer Nuclear Station, Unit 1 (VCSNS), to make changes to its approved fire protection program (FPP) under 10 CFR 50.48(c). In its LAR, the licensee proposed to make several changes to its FPP including changes to plant modifications, use of performance-based alternatives to the requirements of NFPA 805, Chapter 3, and several clarifications and editorial corrections. Based on the information provided by the licensee, the NRC staff requests that the licensee provide the information below.

Probabilistic Risk Assessment (PRA), Request for Additional Information (RAI) 01

In Enclosure 1, Attachment 1, to the licensee's letter dated August 29, 2018, the licensee stated that refinements were made in the main control room abandonment (MCR) model, to make the model symptom-based. The LAR is not clear on whether these refinements go beyond those described in the NFPA 805 LAR (ADAMS Package Accession No. ML113320227). Describe the refinements to the MCR abandonment model and identify the human reliability analysis (HRA) approach used to modify the model, and discuss whether it was used previously to support the NFPA 805 LAR or in another plant LAR and subsequent amendment. In addition, provide clarification regarding whether this refinement to the PRA model is consistent with plant procedures for MCR abandonment.

PRA RAI 02

In Enclosure 1, Attachment 1, to the licensee's letter dated August 29, 2018, the licensee stated that heat release rates (HRRs) were increased to account for secondary combustibles of insulation and high density polyethylene (HDPE) piping. The LAR is not clear on the approach used and its basis. Provide a summary of the approach used for increasing the HRRs and discuss whether it was used previously to support the NFPA 805 LAR or in another plant LAR and subsequent amendment.

PRA RAI 03

In Enclosure 1, Attachment 1, to the licensee's letter dated August 29, 2018, the licensee stated that refinements were made to the reactor coolant pump (RCP) seal loss of coolant accident (LOCA) model based on the RCP seal upgrades. The LAR is not clear on whether these refinements go beyond those described in the NFPA 805 LAR. Describe the refinements to the RCP seal LOCA model and discuss whether the approach was used previously to support the NFPA 805 LAR or in another plant LAR and subsequent amendment and if these changes constitute a PRA upgrade. Provide the basis for the conclusion regarding whether the refinements are considered a PRA upgrade. Please indicate whether you have taken credit for abeyance seals in your PRA model.