

**From:** [SHAW Donis \(ORANO\)](#)  
**To:** [Garcia Santos, Norma](#)  
**Cc:** [McKirgan, John](#); [YATES Douglas \(ORANO\)](#); [NARAYANAN Prakash \(ORANO\)](#); [SHIH Yueh Kan \(ORANO\)](#); [MIGLIORE Rick \(ORANO\)](#)  
**Subject:** [External\_Sender] RE: QUERY: Graded Approach Pilot--Form 68, TS 3.1.4, etc.  
**Date:** Wednesday, February 27, 2019 2:27:02 PM

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Norma,

TN has considered this situation and we feel that:

- There is an Amendment 16 graded approach pilot ground rule that no actual technical changes are to be made.
- Per Form 68, TN felt that Administrative Controls TS 5.2.5 could become a TS Section 3 Limiting Condition for Operation (LCO) and Surveillance Requirement (SR).
- In making that conversion, we needed REQUIRED ACTION COMPLETION TIMES, which TS 5.2.5 did not have.
- By providing REQUIRED ACTION COMPLETION TIMES in new LCO 3.1.4, TN inadvertently did not abide by the ground rule of no technical changes.
- Based on the overall intent and purpose of the Amendment 16 graded approach pilot, we intend to revert new TS LCO 3.1.4 back to an Administrative Controls TS.
- Because TS Administrative Controls are now TS Section 4, this TS will become TS 4.3.6, "HSM or HSM-H Thermal Monitoring Program."
- We will make the necessary changes to Form 68 and to the TS file.

TN will of course wait to hear from you to ensure you generally concur, and if so we will discuss with you the extent of documentation (replacement pages or full versions) that you would prefer to receive in our submittal and we will submit as soon as reasonably possible.

Regards,

Don

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**From:** SHAW Donis (ORN-NPS)  
**Sent:** Wednesday, February 27, 2019 11:19 AM  
**To:** 'Garcia Santos, Norma'  
**Cc:** McKirgan, John; YATES Douglas (ORN-RE); NARAYANAN Prakash (TRANSNUCLEAR INC) (prakash.narayanan@areva.com); SHIH Peter (TRANSNUCLEAR INC) (peter.shih@areva.com); MIGLIORE Rick (ORN-NPS)  
**Subject:** RE: QUERY: Graded Approach Pilot--Form 68, TS 3.1.4, etc.

Norma,

Thank you. TN will look into this immediately and I will let you know what we conclude so that you and I can plan the next appropriate steps.

Don

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**From:** Garcia Santos, Norma [mailto:Norma.GarciaSantos@nrc.gov]  
**Sent:** Wednesday, February 27, 2019 11:12 AM  
**To:** SHAW Donis (ORN-NPS)  
**Cc:** McKirgan, John  
**Subject:** QUERY: Graded Approach Pilot--Form 68, TS 3.1.4, etc.

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Good morning Don,

As we discussed over the phone, the team has been working on the SER for the graded approach pilot. Besides the FQTs, the staff has a questions about changes related to Form #68 (this is also related to TSs 5.2.5 and 3.1.4). I understand that it has been a while, but it appears that the proposed change(s) to A16 is(are) different to the final version of the same TS in A15.

The staff's question is based on the latest submittal related to this item (please clarify if the information considered by the staff is accurate or if there is any more current information that you want to submit).

Based on the information the submittals related to this project, this is the more specific feedback\question that I received from the staff:

- In the A16 proposed TS 3.1.4, Action D is initiated if a) A.2 (air vents blocked) cannot be completed within 16 hours OR b) C.2 (unexplained temperature excursion, return to normal operation) cannot be completed within 16 hours.
- The basis for the time limit of 30 days for completion of Action D is based on the assumption that the air vents are unblocked. If item A.2 is tripped, by default the air vents are blocked and this assumption is no longer valid. This makes the 30 day completion time unacceptable UNLESS it is demonstrated that the steady state temperatures of the fuel cladding and the concrete remain below limits. A revised completion time (based on a blocked vent condition) is required, in addition to the short term actions that must be completed to return the system to normal operation.
- If item C.2 is tripped, then Action D must provide a remedy which immediately (or within a credible time frame) restores the system to normal operation. The 30 day time limit has not been shown to be the limiting time frame for this restoration. In the former TS 3.1.4 (A.15), the 30 day time limit was the period of time allowed for a calculation to be performed, not for returning the system to normal. The short term action for returning the system to normal was either unloading into a Transfer Cask or returning the DSC to the fuel building.

Please contact me if you have additional questions about this email. If you wish to discuss the

staff's question in more detail, I can set up a public meeting.

Thanks in advance,

Norma