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52-001

GE Nuclear Energy

ICEI ABWR

Date _____

To GLEN KELLY NRC

Fax No. _____

This page plus 21 page(s)

From Jack DUNCAN

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please note

Subject ABWR PRA PUNCH LIST

Message An updated punch list follows.

Please provide copies to all the
"NRC contacts" and others as appropriate
including Victor McCree

This revision reflects the
results of our March 23, 24, 25
discussions, recent submittals
by Carol Buckholz and

2222
0/1

page ix

recent discussions with you, Vishu and
Ratlevy

The "non-DSEK items" in the DSEK
item column are now numbered for
easier reference (eg m/a on page 1)

Other additions, changes of note

- I-1 is applicant action: Resolved
- RWCU as OHR success added
under Success Criteria
- C-4 updated to show 2%
unavailability assumption
- "PRA insights" added after O-2
PRA as a design tool
- Human Factors subtasks updated
to reflect 3/28 discussions
- C-6, same O-18A material
submitted 4/2/92
- Site acceptability (under
consequence analysis) accepted
by Bob Pella

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If you or other "NRC contacts" need to discuss these items, they should call the "GE contact"

Please note that in many cases the next actor is NRC. We would like to have estimates of the unknown dates within the next week.

10 page Punch list follows

ABWR Tasks to wrap up PRA

| DSER item | SSAR Section | Title - Subtask | NRC Contact GE Contact | P A R | | | Next Actor | Date | Action | Comments |
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| | | | | l a n | n a l | e v i e w | | | | |
| 1 | | | | | | | | | | |
| Fault Tree Update | | | | | | | | | | |
| O-1 | | RPS Reliability | Kelly Raftery | v | s | | GE | 4/15 | Provide RPS fault tree to NRC thru Fox | |
| n/a | | Update other fault trees | Kelly Raftery | v | s | | GE | 4/30 | Provide balance of fault trees to NRC | Some additional functions to be automated |
| Initiating Events | | | | | | | | | | |
| S-2 | | Defend IORV frequency | Kelly Raftery | v | n | | GE | - | 1. Use 0.1 in requantification | Staff requires use 0.1 event/year. GE accepts - <u>Item Resolved</u> |
| | | | | | | | GE | TBD | 2. Reflect 0.1 in SSAR table and text | |
| C-1 | | IORV success criteria | Kelly Raftery | | | | GE | TBD | | NRC clarification sent 4/1. |
| S-1 | n | Defend one trip per year | Kelly Duncan | v | n | v | n | | none | NRC now agrees 1 trip/year as reasonable - <u>Item Resolved</u> |

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|--------------|-----------------|---|---------------------------|---|---|---|----------------|--|--|
| | | | | l | n | e | | | |
| O-2 | | Evaluate support system failure on plant trips | Kelly Raftery | v | s | s | 4/15 4/8/94 | Review draft material | GE has provided (Jan. 27) draft material (HVAC failure) and list of other support system to be addressed. GE agreed to staff request to add loss of single AC or single DC bus |
| C-3 | | Analyze interfacing LOCA | Kelly Visweswaren | n | | | | GE Document piping upgrade. Track Separately | |
| O-4 | | Outside containment LOCA | Kelly Frederick | s | | | NRC 2 4/18 | Review SSAR | GE request NRC review SSAR 19E.2.3.3. Issue is addressed |
| I-1 | | Confirm site loss of AC, other site specific parameters | Kelly Raftery | s | v | n | | Applicant action <u>Item Resolved</u> | |

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Success Criteria

| | | | | | | | | |
|-----|--|----------------|---|---|---|-------|------------------|--|
| C-2 | ATWS Success Criteria to prevent core damage | Kelly Buchholz | c | c | v | NRC ? | Review submittal | Agreed SSAR treatment is adequate at San Jose 1/92 meeting. Documentation submitted 4/1/92 |
|-----|--|----------------|---|---|---|-------|------------------|--|

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|-----|---------------------------|----------------|---|---|---|-------|------------------|--|
| n3a | ATWS RHR Success Criteria | Kelly Buchholz | c | c | v | NRC ? | Review submittal | Agreed SSAR treatment is adequate at San Jose 1/92 meeting. Documentation submitted 4/2/92 |
|-----|---------------------------|----------------|---|---|---|-------|------------------|--|

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|-----|----------------------------|----------------|--|--|--|--------|------------------|--|
| n4a | RWCU as DHR Success (ACRS) | Kelly Paradiso | | | | GE 4/6 | Calrify with NRC | |
|-----|----------------------------|----------------|--|--|--|--------|------------------|--|

X6953
Call Frank Paradiso

Failure Data

| | | | | | | | | |
|-----|-----------------------------------|-----------------|--|--|--|--|-------------|--|
| C-5 | Justify common cause failure data | Kelly Frederick | | | | | See item 05 | |
|-----|-----------------------------------|-----------------|--|--|--|--|-------------|--|

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FROM CORRECTION

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| | | | | | | w | | | | |
| 0-5 | | Justify train-level common cause approach is adequate | Kelly Raftery | | | | GE | 3/24 | Discuss which components to include with NRC | For item C-3 and 0-5, NRC suggested requantify PRA without addressing CCF, then requantify CCF as sensitivity study as part of input to RAP (Item I-15) |
| C-4 | | Justify test/maintenance data analysis | Kelly Raftery | | | | GE | | Include new values in requantification: test and maintenance unavailability | Action plan discussed with NRC 3/24: T/M unavailabilities will be increased for utility flexibility. EGCS, RGIC RHR unavailability will be taken as 2%. <u>Item Resolved</u> |
| 0-6 | | Justify RHR, HPCF pump failure probability | Kelly Raftery | | | | GE | 4/15 | Provide justification | |

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ABWE Tasks to wrap up PRA

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| O-21A | | List systems no. part of certified design, significant assumptions, assumed reliability | Palla Duncan | | | | | | | |
| Level 1 PRA and Subsequent Related Studies | | | | | | | | | | |
| S-11 | | Fire water credit correction | Kelly Visweswaren | | | | n | n | GE approach conservative. Fire water will be in RAP. No other action needed - <u>m Resolved</u> | |
| <i>Handwritten: K&D</i> <i>Handwritten: n/a</i> | | Requantify level 1 PRA results (base case) | Kelly Raftery | | | | GE | 4/15 | Tabular results to NRC: CDF by initiator and accident class. Will not include item 0-2 (supports system trips) | |
| | | | | | | | GE | 6/30 | SSAR text draft to NRC | |
| O-18A | | Level 1 uncertainty analysis | Kelly Raftery | | v | | GE | 5/15 | Submit uncertainty analysis | Results stop at CDF, will not be propagated through analysis |
| O-11 | | Initiating Event uncertainty | Kelly | | | | | | | Address as part of item O-18A |

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| | | | | l | n | c | | | |
| I-15 | | PRA input to Reliability Assurance | Kelly Rastery | v | | | GE | Define input | General agreement reached on how to proceed |
| n7a | | PRA input to ITAAC | n Duncan | | | | | | |
| 0-22 | | PRA as a design tool | Kelly Duncan | v | s | | GE | 4/15 Provide 90% complete draft | |
| n7b | | PRA Insights | Kelly Duncan | | | | NRC ? | Outline of management closure. June 25 staff deadline | New item, added in 3/23 meeting. Narrative relating how PRA was used, including how several DSER items were addressed |

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| 0-20 | | Shutdown risk. Four subtasks: | Kelly? Visweswaren | c | s | i | GE | 3/24 | Further discussion | |
| | | 1. ABWR design features | | | | | GE | 4/30 | | |
| | | 2. Review of past shutdown events | | | | | GE | 4/30 | | |
| | | 3. Decay heat removal reliability | | | | | GE | 6/30 | | |
| | | 4. Other tasks | | | | | GE | 6/30 | | |

Other Analyses

| | | | | | | | | | | |
|------|--|-----------------|----------------------|---|---|---|-----|------|---------------------------------|---------------------------------|
| 0-12 | | Fire PRA | Kelly Raftery | c | c | s | NRC | 4/15 | Provide results of review to GE | No major items expected |
| 1-9 | | Internal Flood | Kelly Visweswaren | s | s | | | | | Approach outlined 3/24 San Jose |
| | | Four subtasks: | | | | | | | | |
| | | 1) Turbine Bldg | Ehlert | | | | | | | |
| | | 2) Control Bldg | Miller | | | | | | | |
| | | 3) Reactor Bldg | Maxwell Ehlert | | | | | | | |
| | | 4) Event Trees | Gokcek | | | | | | | |

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| <hr/> | | | | | | | | | | |
| Human Factors in PRA | | | | | | | | | | |
| C-5 | | These items are addressed by the following job subtasks: | | | | | | | | Plan (Subtasks A,B, C, D) based on NRC/GE phone call 5 March 92 and discussions 23 March. |
| O-7 | | | | | | | | | | |
| O-8 | | | | | | | | | | |
| O-9 | | | | | | | | | | |
| O-10 | | | | | | | | | | |
| I-2 | | | | | | | | | | |
| I-3 | | | | | | | | | | |
| I-4 | | | | | | | | | | |
| I-5 | | | | | | | | | | |
| I-6 | | A) Provide a list of references/general methods used to determine all failure probabilities. Reference to GESSAR PRA is acceptable. | Beckner Frederick | v | | | GE | | | |
| I-7 | | B) Conduct sensitivity study | Kelly Raftery | v | | | GE | 6/1 | Sensitivity study results | Increase sensitivity range if hard to document source of number |

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|--------------|-----------------|--|---------------------------|---|---|---|--------------|-----------------|---|
| | | | | i | a | n | | | |
| | | C) Develop descriptions for most significant actions for input to control room design ie, provide time available for operator action & signals that the operator relies on. Provides input to control room design & EPGS. | Kelly Duncan | v | | | | GE | Preliminary judgement of significant items documented in 18F.2. |
| | | D) Provide more specific references for operator actions identified as significant based on sensitivity study. References should include table and page numbers in references. Alternatively, use a wider range in performing the sensitivity study. | | | | | | | |

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|--------------------------------|-----------------|--|-------------------------------|--------|--------|--------|---------------|------|--------|--|
| Containment Event Trees | | | | | | | | | | |
| S-4 | | Staff estimates extra credit for vent in Class II internal event and seismic sequences | Kelly Buchholz | | | | | | GE | GE will take credit for vent in Level 1 requantification |
| O-15 | | Treatment of drywell-wetwell bypass in CETs. This item is addressed by two sub tasks: | | | | | | | | |
| | | A) Design basis sensitivity studies | Kudrick Saxena | | | | | | | Tracked separately by Kudrick/Saxena |
| | | B) Determine if CETs need to change | Palla/ Kudrick Buchholz | | | | | | | See O-18, Backend Uncertainty Analysis |
| O-17B | | Modify CET for severe accident phen. | Palla Buchholz | | | | | | | See item O-17A under Backend Analysis |

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Backend Analyses

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|------|--|---|-------------------|-----|-----|-----|-------|------|---|--|
| C-6 | | Flashing during venting | Palla Buchholz | c | c | | NRC ? | | Review submittal | Analysis documented in 4/2/92 submittal. |
| O-14 | | Justify aspects of OPPD (Rupture Disk Setpoint) | Palla Buchholz | c | s | | GE | | Provide documentation indicating results of sensitivity and uncertainty analyses in regard to the OPPD and giving the basis for the setpoint. | GE agreed to raise rupture disk setpoint |
| O-15 | | Net risk of passive flooders system | Palla Buchholz | c | | | GE | 4/30 | Provide documentation indicating results of sensitivity and uncertainty analyses in regard to the passive flooders. | |
| O-16 | | CCI coolability | --- | --- | --- | --- | --- | --- | --- | --- |

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FROM APPROVALS 04-03-92 07:44 PM PIA

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| | | | | w | | | | | | |
| | | - Containment integrity | Palla Buchholz | c | s | | CE | 4/10 | Take credit for assumed factor of safety in calculation. Submit to NRC. | GE has shown staff early results of bounding analysis - work not complete but results appear to support no containment failure |
| | | - Source terms | Palla Buchholz | c | | | | | | See uncertainty analysis |
| O-17A | | Modify CETs for DCH, FCI, etc. | Palla Buchholz | v | | | | | | DCH and FCI nodes are included as early containment failure modes in the current event trees. CCI and Pool bypass will be added if the uncertainty analysis warrants it. |
| O-18 | | Uncertainty analysis | | | | | | | | |

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| | | | | I n c l u s i v e | n a v i c w | c o n f i r m a t o r y | | | | |
| | | - Survey literature | Palla Buchholz | c | c | v | NRC | ? | Review submittal | Discussed at 1/22 meeting in Bethesda. Documented in 4/2/92 submittal. |
| | | - Screen events for applicability to ABWR | Palla Buchholz | c | c | v | NRC | ? | Review submittal | Discussed at 1/22 meeting in Bethesda. Documented in 4/2/92 submittal. |
| | | - Perform sensitivity studies | Palla Buchholz | v | s | | GE | 4/10 | Complete sensitivity studies and document. (some will be missing) | List of sensitivity studies discussed at 1/22 meeting in Bethesda. About 50% of studies complete. |
| | | - Detailed DCH Uncertainty analysis | Palla Buchholz | c | v | v | GE | 4/10 | Incorporate NRC comments. Document study and results. | Essentially done. Discussed at 1/22 meeting in Bethesda and in 2/26 telecon. NRC had only minor comments. |

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| | | | | l | n | c | | | |
| | | - Detailed OCI/Coolability Uncertainty analysis | Palla Buchholz | v | s | s | GE 4/30 | Complete study - incorporating NRC comments | Discussed at 1/22 meeting in Bethesda and in 2/26 telecon |

| | | | | | | | | | |
|-----|--|---|-------------------|--|--|--|--|---|--|
| 5-9 | | Rupture disk operation before 24 hours not cont failure | Palla Buchholz | | | | | n | NRC agrees rupture disk operation is not containment failure. <u>Item</u> <u>Resolved</u> |
|-----|--|---|-------------------|--|--|--|--|---|--|

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| | | | | n | i | i | | | |
| | | | | c | | w | | | |
| S-12 | | ATWS treatment by NRC | Palla Buchholz | | | | | n | NRC agrees GE approach conservative, no other impacts. <u>Item Resolved</u> |
| n17a | Chapter 22 | Severe Accident Closure | Kudrick Buchholz | c | c | | NRC ? | Write section. Inform GE if more info needed beyond that identified in 2/90 submittal. | |
| n18a | | Accident management | Palla Buchholz | s | c | v | NRC | Provide response to GE submittal | |
| Seismic Analysis Beyond Design Base | | | | | | | | | |
| S-5 | | Fuel assembly capacity | Kelly Liu | v | | | GE | Update SSAR | NRC, GE have agreed to 1.2g <u>Item resolved</u> |
| S-6 | | Flat-bottom tank capacity | Kelly Liu | v | | | GE vr | Margins Analysis | GE will probably reduce value |
| S-7 | | Diesel generator capacity | Kelly Liu | v | | | GE f | Margins Analysis | GE will probably reduce value |
| S-8 | | Electrical equipment capacity | Kelly Liu | v | | | GE | Margins Analysis | GE will probably reduce value |

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| | | | | l | n | e | | | |
| I-14 | | Confirm electrical equipment capacities in site specific PRA | Kelly Duncan | v | | | GE | Margins analysis | Site specific PRA not required. Capacities used in margins analysis will be input to ITAAC. |
| O-21B | | Seismic capacities for systems not in certified design | Palla Duncan | v | | | GE | part of margins assessment | |
| S-10 | n | Staff will use LLNL hazard curve | Kelly Duncan | — | — | — | n | n | Seismic PRA not required. <u>Item resolved</u> |
| n20a | n | How to treat seismic hazard uncertainties | Kelly Duncan | — | — | — | c | n | Not required. <u>Item resolved</u> |
| I-10 | | Confirm assumed seismic capacities and incorporate in design specs | Kelly Duncan | v | | | GE | | Probably cover by PRA input to ITAAC |
| I-11 | | Modify seismic PRA to account for soil failures | Kelly Duncan | — | — | — | n | n | Seismic PRA not required. NRC may address by site licensing requirement. <u>Item Resolved</u> |

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| | | | | I | n | c | | | | |
| I-12 | | Plant walkdown by applicant | Kelly Duncan | -- | -- | -- | n | n | n | GE agrees to plant walkdown. Per EPRI NP-6C41 Item resolved |
| I-13 | | Site specific seismic PRA by applicant | Kelly Duncan | -- | -- | -- | n | n | n | Seismic PRA not required. NRC may address by site licensing requirement. <u>Item Resolved</u> |
| O-19 | | Address potential for penetration, isolation valve failure during seismic event | Nalla Znecht | v | | | NRC | ? | Evaluate proposal. More discussion needed nearing resolution. | Proposed approach provided to NRC Dec. 91, Jan. 92 |
| S-3 | | Correct the treatment of firewater in Seismic Class II CET | Kelly Vishu | v | | | GE | | Include correction in margins analysis | GE will correct |
| n20a | | Margins Analysis | Kelly Duncan | | | | NRC | 4/5 | Clarify rules, describe HV calculation | |

Other External Hazards

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| | | | | I | n | e | | | | |
| I-8 | | Site specific design verification: external floods, transportation hazards | Kelly Duncan | | | | NRC i | 5/92 | | "Grandchild" of SECY 016 due about June. Site design analysis alone may be sufficient. |
| Interfaces (General) | | | | | | | | | | |
| n206 | | Be sure PRA "requirements" and insights get into "Interface write up" | | | | | | | | Duncan/Fox need discussion. |

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- S = Staff correction
- O = Outstanding item
- I = Interface requirement
- P = DSER page number - no issue number
- n = Not a DSER item

- s = started
- v = discussed verbally but not documented
- c = complete with documented agreement
- u = not applicable

4/3/92

22/12/92

ABWR Tasks to wrap up 13

| DSER item | SSAR Section | Title - Subtask | NRC Contact GE Contact | P I n e n l i e w | A n n u n c i e n c e | R e q u i r e m e n t s | Next Action | Comments |
|----------------------|--------------|---|---------------------------|---|---|--|-----------------------------------|---|
| Consequence Analysis | | | | | | | | |
| n21a | | No NRC feedback on site acceptability from weather standpoint | Palla Gareway | | | | NRC ? Reflect agreement in SER | Palla/Gareway discussed 4/2. NRC agrees. <u>Item Resolved</u> |

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