

**From:** gary.d.miller@dominionenergy.com  
**Sent:** Tuesday, September 28, 2021 3:29 PM  
**To:** Klos, John  
**Subject:** [External\_Sender] Surry Fuel Melt Safety Limit (SL) LAR Question

John,

Per our discussion this morning regarding the update of the UFSAR as a result of the Fuel Melt Safety Limit (SL) LAR, an UFSAR update is not required as a result of the revision of the SL. As noted in Attachment 1, page 3 of 10, of the LAR discussion of the change:

*The peak fuel centerline temperature SL is independent of the PAD5 methodology (Reference 2). The current licensing basis safety analyses use the existing SL 2.1.A.1.b for fuel melt as an acceptance criterion as required by the current methodology. Thus, Dominion Energy Virginia will continue to meet the existing SL when using its current licensing basis safety analyses even with the implementation of the proposed SL. Since the existing SL for peak fuel centerline temperature is more restrictive than the proposed limit, the current licensing basis safety analyses remain conservative with respect to the proposed SL.*

Consequently, since we will continue to use the existing, more restrictive, SL, a UFSAR change is not necessary. However, the UFSAR Chapter 14 safety analysis will be reviewed and updated as required to address the implementation of PAD 5. The non-LOCA analyses of record updates are part of the PAD 5 implementation which is planned in 2022.

Note that this approach is consistent with the NRC SER for Turkey Point dated August 15, 2019, TURKEY POINT NUCLEAR GENERATING UNIT NOS. 3 AND 4 – ISSUANCE OF AMENDMENT NOS. 288 AND 282 REGARDING REVISED REACTOR CORE SAFETY LIMIT TO REFLECT TOPICAL REPORT WCAP-17642-P-A, REVISION 1 (EPID L-2018-LLA-0120), [ML19031C891] which states:

*As previously discussed, the peak fuel centerline temperature SL is independent of the PADS methodology. Therefore, the NRC staff reviewed the proposed SL to ensure that it is supported by the current licensing basis safety analyses. The current licensing basis safety analyses use the existing SL 2.1.1.b for fuel melt as an acceptance criterion as required by the current methodology. Thus, the licensee will continue to be required to meet the existing SL when using its current licensing basis safety analyses even with the implementation of the proposed SL. Since the existing SL for peak fuel centerline temperature is more restrictive than the proposed limit, the current licensing basis safety analyses will remain conservative to the proposed SL. Thus, the staff determined that the proposed limit is acceptable with the Turkey Point current licensing basis.*

Please advise if you have any further questions.

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