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UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

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ADVISORY COMMITTEE ON REACTOR SAFEGUARDS

(ACRS)

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SHINE SUBCOMMITTEE

+ + + + +

TUESDAY

JUNE 21, 2022

+ + + + +

The Subcommittee met via Video
Teleconference, at 1:00 p.m. EDT, Ronald Ballinger,
Chairman, presiding.

COMMITTEE MEMBERS:

- RONALD G. BALLINGER, Chairman
- VICKI M. BIER, Member
- CHARLES H. BROWN, JR. Member
- VESNA B. DIMITRIJEVIC, Member
- GREGORY H. HALNON, Member
- WALTER L. KIRCHNER, Member
- JOSE MARCH-LEUBA, Member
- DAVID A. PETTI, Member
- JOY L. REMPE, Member
- MATTHEW W. SUNSERI, Member

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1 ACRS CONSULTANT:

2 DENNIS BLEY

3 KEN CZERWINSKI

4 STEVE SCHULTZ

5

6 DESIGNATED FEDERAL OFFICIAL:

7 CHRISTOPHER BROWN

8

9 ALSO PRESENT:

10 MARC ANDERSON, Sargent & Lundy

11 MICHAEL BALAZIK, NRR

12 JEFFREY BARTELME, SHINE

13 JOSH BORROMEO, UNPL Branch Chief, NRR

14 CATHERINE KOLB, SHINE

15 ANDREW PRINARIS, NRR

16 TRACY RADEL, SHINE

17 ROGER THOMAS, SHINE

18 GLENN TUTTLE, NMSS

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AGENDA

Opening Remarks and Objective 4

Staff Opening Remarks 7

SHINE Medical Technologies, LLC/NRC Staff

Chapter Discussions

3-Design of Structures, Systems,
and Components 10

8-Electrical Power Systems 29

4-IU and RPF Facility Description 32

9-Auxiliary Systems 86

11-Radiation Protection and Waste Management . . 90

12.7-Emergency Planning 96

12.13-Material Control and Accounting 97

13-Accident Analysis 101

Public Comments 110

P R O C E E D I N G S

(1:00 p.m.)

CHAIR BALLINGER: The meeting will now come to order. This is a meeting of the SHINE Subcommittee of the Advisory Committee on Reactor Safeguards.

I am Ron Ballinger, Chairman of today's subcommittee meeting. ACRS members in attendance are Charlie Brown -- let's see. I'll go right from here. Matt Sunseri, Jose March-Leuba, Walt Kirchner. Who else did I -- Vesna Dimitrijevic. Who did I miss? Well, if I missed somebody, please say something. Oh, Vicki Bier. Excuse me. She was sitting right here for crying out loud. We have our consultants, Steve Schultz and --

MEMBER REMPE: Member Ballinger, you forgot the left side of the table.

CHAIR BALLINGER: Oh, Dave Petti, Joy Rempe. I was taken over by the aura. We now have consultant Ken Czerwinski here for the first time.

During today's meeting, the subcommittee will have discussion with the NRC staff and SHINE Medical Isotopes addressing technical issues identified in our memorandums for Chapters 3, 4, 8, 9, 11, 12.7, 12.13, and 13.

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1 Part of the presentations for the
2 Applicant and the NRC staff may be closed in order to
3 discuss information that is proprietary to the
4 licensee and his contractors pursuant to 5 USC
5 552b(c)(4). Attendance at the meeting that deals with
6 such information will be limited to the NRC staff and
7 its consultants, SHINE, and those individuals and
8 organizations who have entered into an appropriate
9 confidentiality agreement with them.

10 Consequently, we need to confirm when we
11 get, when we do the closed meeting, if we have one,
12 that we have only eligible observers and participants
13 at those meetings.

14 The rules for participation at all ACRS
15 meetings, including today's, were announced in the
16 Federal Register on June 13, 2019. The ACRS section
17 of the U.S. NRC public website provides our charter,
18 bylaws, agendas, letter reports, and full transcripts
19 of all full and subcommittee meetings, including
20 slides presented there. The meeting notice and agenda
21 for this meeting were proposed there. We have
22 received no written statements or requests to make an
23 oral statement from the public.

24 The subcommittee will gather information,
25 analyze relevant issues and facts, and formulate

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1 proposed positions and actions as appropriate for
2 deliberation by the full committee. The rules for
3 participation in today's meeting have been announced
4 as part of the notice of this meeting previously
5 published in the Federal Register.

6 Today's meeting is a hybrid meeting held
7 in person or over Teams. The telephone bridge line
8 allowing participation of the public over their
9 computer using Teams or by phone was made available.
10 Additionally, we have made a Teams link available on
11 the published agenda. This will be the same length
12 for the, for other meetings.

13 Okay. A transcript of the meeting is
14 being kept. Therefore, we request that meeting
15 participants and Teams, on Teams and on the Teams
16 call-in line identify themselves when they speak and
17 to speak with sufficient clarity and volume so that
18 they can be readily heard. Likewise, we request that
19 meeting participants keep their computer and/or
20 telephone lines mute when not speaking to minimize
21 disruptions. The chat feature on the Teams should not
22 be used for any technical exchanges.

23 Before we get going and introduce Josh for
24 an introductory statement, for my purpose, the purpose
25 of this meeting is to get closure on those chapters.

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1 So, during our review of those chapters that I
2 mentioned earlier, in our memos we identified
3 potential areas that needed maybe a little bit further
4 discussion, issues that needed to be clarified, or
5 other issues like that. The staff and the Applicant
6 has these memos.

7 And so hopefully the result of this
8 meeting will be what I would call closure on those
9 chapters. Closure either, to me, means either actual
10 closure or maybe we identify something that just we
11 can't get closure on. But that's where I'm going from
12 this meeting.

13 Now, are there other members that have
14 comments that they'd like to make related to this?
15 Hearing none, thank you. So I'll now turn it over to
16 Josh. And I think SHINE's going to start first,
17 right?

18 MR. BORROMEO: Yeah, yeah, SHINE's going
19 to start first. But, you know, my name is Josh
20 Borromeo. I'm Chief of the Non-Power Production and
21 Utilization Facility, Licensing Branch. And I
22 appreciate ACRS's continued timely review of the SHINE
23 operating license.

24 And as Professor Ballinger said, you know,
25 we hope the combination of the discussions today and

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1 some of the documents that we have uploaded are going
2 to, you know, get us to closure, at least clarity, on
3 the dozen or so questions and concerns from the
4 previous engagements that we've had.

5 To us, the two I'll call more significant
6 items are the seismic margin discussion, as well as
7 the system actuation timing table. So those we'll
8 probably go into a little bit more depth when we get
9 to those areas. And we'll be leading with the seismic
10 discussion today.

11 And again, I want to thank ACRS for their
12 time and the staff and SHINE for their continued
13 efforts on this project. So with that, I'll turn it
14 over to SHINE.

15 CHAIR BALLINGER: Is SHINE on?

16 MR. BARTELME: Thanks, Josh. So we've got
17 sort of the summary concerns issue document that was
18 put together coming from the individual chapter memos.
19 We just kind of wanted to go through each chapter and
20 make sure each open items are identified if it was a
21 SHINE issue or staff issue and see if we can't reach
22 closure on each of these. Because of availability of
23 --

24 MEMBER REMPE: Excuse me for just a
25 second.

1 CHAIR BALLINGER: Yeah, we're very garbled
2 here.

3 MEMBER REMPE: Yeah, we need more volume
4 or you need to get closer to the mic. I'm Joy Rempe,
5 and I'm in the room. And we're having trouble hearing
6 you.

7 MR. BARTELME: All right. Thanks. Is
8 that any better?

9 MEMBER REMPE: Not enough. Maybe we're
10 trying to do some stuff here in the room, too, hold
11 on, and maybe that will solve it. Sorry to interrupt
12 you. But we need to do it now rather than later.
13 Okay. Try again, please.

14 MR. BARTELME: Can you guys hear me all
15 right now? Is it less garbled?

16 MEMBER REMPE: That's much better. Thank
17 you.

18 MR. BARTELME: Okay. So we've got the
19 summary documents kind of with the concerns or issues
20 from each memo. We just wanted to work through
21 chapter by chapter. Because of, you know,
22 availability of the folks supporting SHINE on these
23 requests that we start with Chapter 3 first and then
24 move to a discussion on the Chapter 8 items if we
25 could.

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1 CHAIR BALLINGER: This is Ron Ballinger.
2 Can the court reporter hear us okay? Oh, good,
3 because we have no slides for this meeting. And so
4 that's, the transcript is going to be the record. And
5 so it's important that while we might not be able to
6 hear people well enough, you do. Thanks. Okay.
7 Let's go.

8 MR. BARTELME: Okay. So, if we could
9 start with some of the actual items under the Chapter
10 3, coming from the Chapter 3 memo related to a basis
11 for the 25 percent margin in the seismic gap, we've
12 got Marc Anderson from Sargent & Lundy here to support
13 SHINE. And he can provide additional discussion on
14 the basis for the seismic gap and the structural
15 evaluations SHINE has performed. So, Marc, if you
16 could, please.

17 MR. ANDERSON: Sure. Thanks, Jeff. My
18 name is Marc Anderson from Sargent & Lundy.

19 So, just to follow on this item from our
20 previous discussion, you know, as we stated there as
21 a safety related portion of the facility and a non-
22 safety related portion of the facility, the safety
23 related portion of the facility has been designed for
24 the SSE earthquake event. We did a very detailed
25 analysis, soil structure interaction analysis using

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1 NUREG 0800 Section 371 and Reg Guide 161 input
2 directly from the NRC. And we generated an in-
3 structure response spectra.

4 And essentially, in the analysis of the
5 facility, we did a few different types of seismic
6 analyses to determine what would control the building
7 design. And for deflections, we used an equivalent
8 static model. And we determined deflections at the
9 roof elevation of the facility, which is the highest
10 elevation. And we considered that to be controlling.

11 Additionally, we calculated deflections
12 for the what I'll call the admin annex or the non-
13 safety related portion of the facility according to
14 the design basis for that facility. And we ensured
15 that the seismic gap between the two facilities was
16 large enough to accommodate the two deflections
17 assuming that they were added together.

18 Separately, we looked at what would happen
19 if there happened to be some interaction, if say the
20 non-safety related building were to experience the
21 larger earthquake that the safety related facility is
22 required to be designed for. We looked at what would
23 happen if the non-safety related building were to come
24 into contact with the safety related building.

25 And we determined that the safety related

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1 building is designed for the aircraft impact analysis
2 and the energy associated with that. And the energy
3 associated with that is significantly larger than the
4 energy that it would see if the non-safety related
5 building were to collapse or fall into or bump into
6 the safety related facility in this earthquake event.

7 CHAIR BALLINGER: So this is Ron
8 Ballinger. So what you're saying is that the aircraft
9 impact deflection, if you will, dominates.

10 MR. ANDERSON: No, I'm sorry. Let me
11 clarify a little bit further.

12 So the seismic gap that we had described
13 in the previous meeting is sized based on the various
14 earthquake events that the two buildings are licensed
15 to be designed for. All right. So the safety related
16 facility is designed for this SSE event. And we've
17 determined deflections as a result of that SSE event
18 and the seismic gap appropriately.

19 Separately from sizing this seismic gap in
20 a way that we felt had enough margin to avoid any
21 interaction between the two facilities, we said, well,
22 what if the non-safety related building did come into
23 contact with the safety related building during this
24 SSE earthquake event. And we did evaluate that
25 scenario.

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1 And we determined that the energy that the
2 safety related building is designed for as a result of
3 the aircraft impact event is higher than the energy
4 that the safety related building would need to be
5 designed for if the non-safety related building were
6 to fall into the safety related building or to come in
7 contact with it.

8 So it's not that the deflections for the
9 earthquake, or excuse me, for the aircraft impact
10 controlled. It's that the design of the safety
11 related facility is such that there would be no
12 negative effects if the non-safety related building
13 were to come in contact with it. Its design is
14 bounded by the aircraft impact.

15 CHAIR BALLINGER: Okay. So where do we
16 get to the 25 percent?

17 MR. ANDERSON: So the 25 percent margin
18 is, or approximately 25 percent margin is what remains
19 of the distance between the two facilities when you
20 add the deflection of the safety related building to
21 the deflection of the non-safety related building.

22 MEMBER PETTI: So, in absolute terms, what
23 is that distance?

24 MR. ANDERSON: I want to make sure I have
25 the right numbers in front of me.

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1 MEMBER PETTI: Sure.

2 MR. ANDERSON: One second. The seismic
3 gap is sized at one inch. The largest deflections of
4 the safety related facility are, at the highest
5 elevation are .35 inches. And that's as a result of
6 the SSE earthquake event.

7 MEMBER PETTI: And that's at the top.

8 MR. ANDERSON: And that's at the top of
9 the building. And then we determined deflections at
10 a few different areas of the non-safety related
11 building, because there's a couple different
12 elevations.

13 And those deflections are, at one
14 elevation, at the highest roof of the non-safety
15 related building, which is approximately five feet
16 lower than the highest roof of the safety related
17 building, the maximum deflection is .34 inches. And
18 that deflection is actually a result of wind loading.
19 We conservatively considered the wind loading in
20 conjunction with the SSE earthquake just because, you
21 know, we wanted to make sure there was a conservative
22 design.

23 There is a lower roof elevation on a
24 different side of the building that we checked for
25 deflections. The maximum deflections as a result of

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1 the earthquake event at that roof are .45 inches, so
2 that ends up controlling.

3 So, when you add the .45 to the, .45 for
4 the non-safety related building to the .35 for the
5 safety related building, you actually get about .8
6 inches. So the margin is -- and I'm rounding up the
7 numbers here. So the margin is a little more than 20
8 percent between those two buildings.

9 CHAIR BALLINGER: Okay. So I guess Dennis
10 Bley, who is a consultant, that asked the question
11 during one of the previous meetings is not here, is
12 not with us today. So I'm trying to be very clear in
13 the transcript so that when he reads it he'll see it.
14 But where does the 25 percent come from? Who decided
15 that it needed to be 25 percent, or what decided that
16 it needed to be 25 percent?

17 MR. ANDERSON: There was no --

18 CHAIR BALLINGER: Oh, oh, okay. Dennis
19 just came on. So he can ask the question more
20 directly.

21 MR. ANDERSON: Sure.

22 CHAIR BALLINGER: Dennis, are you there?

23 DR. BLEY: Yeah. Sorry. I just arrived.
24 And I take it you're talking about what we asked
25 about. Was there any answer? I don't see any slides

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1 or anything up here.

2 CHAIR BALLINGER: Yeah, there are no
3 slides for this meeting. And we just went through --
4 and I'm not sure that we, that some of these numbers
5 might not be proprietary, but apparently they're not,
6 the numbers for the actual deflections. But my
7 question was still, where did the 25 percent come
8 from? How did you decide it was 25 percent?

9 DR. BLEY: Yeah, there were two related
10 things. One was where did it come from and how
11 confident are we that that covers all you need to
12 cover.

13 And the second thing was if you didn't
14 really look beyond the design-basis event, do we have
15 any confidence that we're not sitting on the edge of
16 a cliff. And even if everything was calculated
17 perfectly, the methods you used to calculate this
18 leaves about a 15, 20 percent chance that we'll get an
19 earthquake greater than the DBE at least in some of
20 the parameters.

21 So the question was, are we sitting on a
22 cliff? If we get a little bit bigger earthquake than
23 we planned on, do we have a serious problem or not?
24 And part of that, that all has to do with the
25 uncertainties in the calculation. So --

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1 MR. ANDERSON: Sure. So there's two
2 things. So the first thing is sort of the acceptance
3 criteria question. Who decided that the 25 percent
4 was sufficient? And the acceptance criteria is that
5 the seismic gap is simply larger than the calculated
6 maximum deflections, which we believe to be
7 conservatively calculated. That just happens to be
8 the margin, approximately, you know, 20 to 25 percent
9 in the gap.

10 The second question is do we have any
11 concerns. You know, if the margin is 20 to 25
12 percent, then is there a concern that if we see an
13 earthquake event that happens to go slightly above the
14 DBE, are we, you know, will we run into issues? And
15 I was trying to address that earlier. It seems like
16 my explanation may not be entirely clear. So let me
17 try to explain it again.

18 The safety related facility is designed
19 for this aircraft impact event. And I keep bringing
20 it up. I know it's separate from the SSE earthquake.
21 But it's related in this way. It has to do with a
22 pretty large mass traveling at a high velocity
23 creating a large impact energy. And similarly, you
24 know, if this non-safety related building were to
25 start shaking an earthquake event and were to impact

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1 the safety related facility in some way, it would have
2 a similar type of dynamic energy effect.

3 And so what we've done is we've looked at
4 what happens if the non-safety related facility does
5 eat into that seismic gap margin and potentially
6 either bump into the safety related facility or even
7 collapse into it, does that cause a problem.

8 And what we concluded is that the
9 earthquake, or excuse me, the aircraft impact energy
10 that the building was designed for is significantly
11 larger than the energy it would see if the non-safety
12 related building were to collapse into it. And that's
13 how we justified it.

14 DR. BLEY: I have to think about that. I
15 mean, you're looking at -- generally when you do the
16 aircraft impact analysis, you're looking at some very
17 dense part of the aircraft penetrating into particular
18 areas of the facility. And here we're looking at kind
19 of the general effect over the building being moved.

20 And your argument might stick together
21 pretty well. But I have to think about that some.
22 And I don't think we have any details to look at to
23 let us understand this better. I don't know.

24 I'm not even sure who I'm talking to. I
25 apologize, because I was late. I had a medical

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1 appointment this morning. And I just got back. So
2 you're with SHINE?

3 MR. ANDERSON: My name is Marc Anderson.
4 I'm the structural engineering manager with Sargent &
5 Lundy. And SHINE has contracted us to design the
6 facility and perform these analyses. So Jeff asked me
7 to be on the call today to discuss these issues.

8 DR. BLEY: Okay. And you are fairly
9 convinced that an earthquake a little bigger than the
10 SSE if it either can't lead to an impact on that
11 building or if it does it's not going to be, cause
12 significant damage. I think that's what I heard you
13 say. And it's based on an analogy to the aircraft
14 impact analysis.

15 MR. ANDERSON: That's correct. Yeah.
16 Now, for the aircraft impact, you know, as you know,
17 we analyzed the building for two sort of separate
18 failure modes. One is a local impact where we
19 consider a fairly dense portion of the aircraft to see
20 whether or not it penetrates any aspect of the
21 building.

22 And then second is the global effects. So
23 we check what happens to the entire building or, you
24 know, the portion of the building that the aircraft
25 strikes, what happens as the load distributes through

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1 the building.

2 And, you know, we derive an energy based
3 on the mass and velocity of the aircraft. And we can
4 similarly derive an energy from the non-safety related
5 building based on these peak spectral velocities
6 associated with the SSE and the mass of the building
7 and conclude that the aircraft impact energy is
8 significantly larger.

9 DR. BLEY: And the step beyond that is it
10 doesn't cause any significant damage.

11 MR. ANDERSON: That's correct.

12 DR. BLEY: I'm assuming that like most
13 aircraft impact analyses I've seen this is in some
14 manner restricted information. I'm not -- I'm pretty
15 sure, well, I know I haven't seen any of it. Is it
16 available for the ACRS to look at, or has the staff
17 looked and inspected it and examined it?

18 MR. BARTELME: This is Jeff Bartelme from
19 SHINE. I'd have to look, but I do believe it has been
20 made available to the staff via our NRC Reading Room.
21 But we've not placed it on Box for the ACRS members to
22 view.

23 DR. BLEY: Okay. Is --

24 CHAIR BALLINGER: This is Ron. So should
25 we request that it be put on the Box?

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1 DR. BLEY: Well, I would like to hear from
2 the staff, if the staff has heard this argument, if
3 they've heard it before or just now for the first time
4 and their opinion of it, because I would hope they've
5 looked at the analysis that's being discussed here.

6 CHAIR BALLINGER: Should we save that for
7 the staff, or has the staff got an answer now?

8 MR. BALAZIK: This is Mike Balazik, NRC
9 staff. Andrew, is this something we can respond to
10 now, or is this something we need to address a little
11 bit later?

12 MR. PRINARIS: Mike, we can address it
13 right now. It is my understanding, it is my clear
14 understanding that the aircraft impact since the PSAR
15 has not been really modified by much and probably not
16 at all, and certainly a letter can confirm this.

17 So, and we did look, as Mr. Anderson said,
18 that there is a local and a global impact. And there
19 is an RAI to this effect. But the analysis, the
20 aircraft, the earthquake analysis and the aircraft
21 impact analysis are related. So I'm not so sure if
22 ACRS had the opportunity to look at these RAIs.

23 But the numbers that Mr. Anderson provided
24 at least for the safety related building I do recall
25 that number reading in the analysis. And what you

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1 have is obviously a non-safety related, probably a
2 monitoring building, to the best of my recollection,
3 and a shear wall building. And the shear wall
4 building is the one that is going to absorb the
5 aircraft impact. And that's what Mr. Anderson I
6 believe is relating. Is that adequate to ACRS?

7 DR. BLEY: I can't tell you right now. I
8 guess, Ron, if we can get a look at the global
9 analysis and have a chance to think about it, it would
10 be helpful, because --

11 MR. PRINARIS: I think if you go to, to
12 the best of my recollection, again, to the PSAR ADAMS
13 accession numbers, I believe, to the best of my
14 understanding again, that PSAR aircraft analysis
15 hasn't changed by much.

16 CHAIR BALLINGER: So I guess, this is Ron
17 again, in order to get closure on this, can we work
18 through Chris and get whatever we need to get this
19 done?

20 MR. BALAZIK: This is Mike Balazik, NRC
21 staff. Yeah, we can work with SHINE to get up the
22 analysis into Box for Dr. Bley to look at.

23 CHAIR BALLINGER: Okay.

24 MEMBER REMPE: It sounds like --

25 MR. BARTELME: Yeah, this is Jeff Bartelme

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1 from SHINE. We'll get a copy of the aircraft impact
2 evaluation on Box for your reading.

3 MEMBER REMPE: It sounds like there is an
4 RAI and a response from SHINE, too, that would be
5 helpful. Is that true? And if so, could we have
6 access to that, which doesn't require the Box?

7 MR. BALAZIK: This is Mike Balazik, NRC
8 staff. Yes, I will find that RAI. And I can send
9 that over to Chris.

10 CHAIR BALLINGER: Okay. So the way I look
11 at we have two possible paths. One is look at the
12 RAI, and the other is put stuff in the Box to be, for
13 Dennis to look at. And it's probably not a bad idea
14 to take both paths.

15 DR. BLEY: I think that's right. And then
16 I think the committee needs to have a little
17 discussion about it. This is, I mean, it's kind of a
18 back door way to address the issue. But maybe it's
19 pretty reasonable. I'm not positive yet.

20 MR. PRINARIS: This is Andrew Prinaris
21 from the staff. So I'm trying to understand what ACRS
22 is looking for. You're looking for a seismic
23 acceleration exceeding the design requirements.

24 DR. BLEY: Well, we're not looking for it.
25 We're worried there could be one. And actually by the

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1 way you design these things, the chance that you have
2 something somewhat above the design is not negligible.
3 It's a pretty substantial chance. And the question
4 was are we confident that we don't have any
5 significant problems if we go a little beyond that.
6 And --

7 MR. PRINARIS: So what they're looking is
8 for a seismic event beyond the design-basis event.

9 DR. BLEY: Well, that's what we're
10 thinking about. And to look at your global analysis,
11 and usually I've only seen the other ones where you're
12 looking into the penetrating aspects of the aircraft
13 crash, this sounds kind of reasonable to me. But
14 since I haven't seen anybody do it this way before, I
15 probably want to take a look.

16 MR. PRINARIS: Sure. I was just trying to
17 understand, you know, what is the driving force to go
18 beyond design-basis events.

19 DR. BLEY: Well, the driving force is --
20 well, the easiest place to point you to is when the
21 Mineral earthquake occurred, it turned out that some
22 of the parameters were above the design basis. And
23 everybody got a little excited about that.

24 And then the utility and the designers met
25 with the Commission and explained that, yeah, the way

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1 this analysis is done there's about a 15 percent
2 chance that an earthquake bigger than the design basis
3 will occur. And to me that's not a negligible chance.

4 And the related question is usually, and
5 people looked at this a lot 30, 40 years ago, the
6 worry was, gee, if we, is there a cliff at the design
7 basis earthquake. If we go a little beyond that, does
8 the plant fall apart? Do we get in serious trouble?

9 And for almost all aspects of the design,
10 the answer has always been no, it's kind of a gentle
11 degradation as you go beyond there, with the exception
12 of a few design issues associated with buildings.

13 And one of those that came up and led to
14 a change was the case where two buildings could bump
15 into each other. And that looked like it could lead
16 to substantial damage. And it ended up leading to a
17 change in the design, a modification to absorb that
18 energy without causing problems.

19 So, you know, if we had done a seismic
20 PRA, we would know for sure whether there was a cliff
21 edge here and we were getting into trouble. We
22 haven't done that.

23 So, to make sure we don't have a real
24 problem if we go a little beyond where we're designed,
25 we saw these buildings were close together, wondered

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1 how close they were and what the margin was and how
2 that was decided and if that was enough to make sure
3 we wouldn't have any impact.

4 The way SHINE described it today, maybe,
5 maybe not, but that you would get some impact in the
6 global aircraft crash, and that looked like it would
7 be more severe than an earthquake a little beyond the
8 design basis. It might be a very reasonable argument.
9 But we haven't seen any details of it. And that's all
10 I'm asking for.

11 DR. SCHULTZ: Marc, this is Steve Schultz.
12 I've got a question that goes back to the portion of
13 the presentation you made before Dennis joined. And
14 that is when you were describing the evaluation and
15 analysis of the gap and its margin, you said that for
16 the non-seismic related building you had assumed a
17 wind loading, a high wind loading along with the
18 seismic event. How much margin would there be if you
19 took out that high wind loading?

20 MR. ANDERSON: For that portion of the
21 facility, the wind loading is -- let's see. So the
22 seismic deflection at that portion of the facility is
23 .18 inches instead of the .34 inches associated with
24 the wind loading. So the margin would increase to
25 about 50 percent probably, something like that.

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1 DR. BLEY: Oh, I missed that. Thanks,
2 Steve, for pointing that out. That sounds --

3 DR. SCHULTZ: They assumed it was
4 coincident, the wind loading and the seismic event.

5 DR. BLEY: And that's pretty, very
6 unlikely. So --

7 DR. SCHULTZ: That's why I brought it up.

8 DR. BLEY: Yeah. Okay. Thank you.

9 DR. SCHULTZ: I didn't expect it to be
10 that large. So, anyway, I agree with you, Dennis. It
11 would be nice to have these things lined up and have
12 the ability to see what would happen if one assumed a
13 slightly higher seismic loading would occur and what
14 likelihood that was.

15 CHAIR BALLINGER: But, in effect, taking
16 away the wind loading --

17 DR. SCHULTZ: It seems like it.

18 CHAIR BALLINGER: Yeah, that's what it
19 does.

20 DR. SCHULTZ: It provides some substantial
21 margin.

22 CHAIR BALLINGER: Yeah.

23 DR. BLEY: That helps a lot. But I think
24 I'd still like to take a look at that global analysis.

25 DR. SCHULTZ: I would, too.

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1 DR. BLEY: Yeah.

2 CHAIR BALLINGER: Okay. So are we clear
3 on the path for this, the RAIs and the Box? Does that
4 satisfy everybody?

5 MR. BALAZIK: Yeah, this is Mike Balazik.
6 Yes, we're clear on the path and the RAIs and the
7 global response on the Box.

8 CHAIR BALLINGER: Great. Okay. So are we
9 okay with this discussion on this topic?

10 MEMBER BROWN: Where are we going?

11 DR. BLEY: Yeah. Thanks, Ron.

12 CHAIR BALLINGER: Answer yes.

13 MEMBER BROWN: I just wanted to make sure
14 we understood that it was not, the path is
15 undetermined --

16 CHAIR BALLINGER: No, I think --

17 MEMBER BROWN: -- because that's what I
18 took away from this, the discussion. They made their
19 points. But what's going to be done in response to
20 those --

21 CHAIR BALLINGER: They're going to provide
22 RAIs related to the analysis, as well as --

23 MEMBER BROWN: They're going to add,
24 they're going to provide additional --

25 CHAIR BALLINGER: Yeah.

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1 MEMBER BROWN: -- documentation.

2 CHAIR BALLINGER: Yeah.

3 MEMBER BROWN: That works.

4 CHAIR BALLINGER: And then --

5 MEMBER BROWN: I didn't -- that kind of
6 spun right past me. Sorry about that.

7 CHAIR BALLINGER: Okay, okay. Okay. That
8 actually was a pretty good discussion come to think of
9 it. Okay. I'm not -- what's next?

10 MR. BALAZIK: This is Mike Balazik, NRC
11 staff. The next item we'd like to talk about is
12 Chapter 8. There was a concern related to the 180-
13 second time delay, that the target solution stays in
14 the TSV after a loop. And there were also some
15 additional input from Member Brown.

16 Jeff, do you want to start with talking
17 about the 180-second time delay?

18 MR. BARTELME: Sure. And Catherine's
19 going to lead the response on that particular concern
20 or issue.

21 MS. KOLB: Yeah, this is Catherine Kolb,
22 Senior Director of Plant Operations. The concern from
23 before was does the 180-second delay matter, you know,
24 was there anything that the operators could do in the
25 180 seconds that would make it be a reasonable delay

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1 from an operational sense. And we believe yes, it is.
2 So, if there was a momentary loss of offsite power
3 from the grid, only the two main breakers would open,
4 presumably on under voltage, but they trip on a
5 variety of things --

6 MEMBER MARCH-LEUBA: This is Jose. Can
7 you speak slower and a little maybe further? You guys
8 have a terrible microphone. I can hardly understand
9 what you're saying. And this is continuously always
10 the same. Please speak more clearly, at least slower.
11 Okay? Okay.

12 MS. KOLB: Okay. We're switching our
13 microphone. Hold on.

14 CHAIR BALLINGER: And there's kind of an
15 echo a little.

16 MS. KOLB: Is this --

17 MEMBER MARCH-LEUBA: This is consistent.
18 The SHINE microphone is terrible. I mean, pick up the
19 handset --

20 DR. BLEY: It's much, this is much better.

21 MS. KOLB: Okay. Good. So I apologize.
22 So the concern from before was did the 180-second
23 delay matter, could an operator do anything in that
24 180 seconds that would make it worthwhile for
25 including it in the design. And we believe yes.

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1 So, on a loss of offsite power, the two
2 main breakers would open, presumably on under voltage
3 but could open on other things. If the grid was
4 restored, if this was a momentary transient or a
5 couple second transient, the control room operators
6 would have knowledge of the voltage available. And
7 they would be able to reclose those two breakers.

8 Those two breakers are controlled using
9 our process integrated control system, the PICS, that
10 they can operate from the control room. So they
11 wouldn't need to dispatch anyone to the field or
12 anything in order to take advantage of the 180-second
13 delay and restart the process cooling water, or
14 process closed loop cooling system, the PCLS, in order
15 to recover.

16 MEMBER MARCH-LEUBA: And this is Jose
17 again. And this is the only action they're supposed
18 to take, to close the breakers for the pumps, or do
19 they have to recognize -- well, obviously, they have
20 to recognize the high voltage. But do they have to
21 recognize any valve alignments or any other things?

22 MS. KOLB: No, the valves are not expected
23 to change states. In response to this, the -- if it
24 doesn't restart, the worst thing that would happen is
25 the 180 seconds would time out and it would, an IU

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1 cell safety actuation would occur as designed.

2 So, yes, if power was off for a long time,
3 you know, 2 minutes and 59 seconds, then, yeah, there
4 would be nothing they could do. But if it was
5 momentary, we believe 180 seconds would be sufficient
6 to recognize that this had been restored, close the
7 two breakers, restore PCLS. And then they would have
8 sufficient time to restart the neutron drivers in
9 order to resume operation. And they wouldn't be bound
10 by any time limits at that point.

11 MEMBER MARCH-LEUBA: And the only reason
12 we dump all the TSV solution from the TSV tank, is it
13 because it cannot, the TSV tank cannot reject decay
14 heat without active cooling and it needs to be dumped
15 into the dump tank where it can possibly cool,
16 correct?

17 MS. RADEL: So, this is Tracy Radel,
18 SHINE's VP of Engineering. The system has been
19 evaluated for the thermal hydraulics of leaving it in
20 there for three minutes.

21 It is correct what you stated, that the
22 heat transfer through the PCLS and into the pool water
23 from the target solution Bessel would not be
24 sufficient to keep it in there long-term, with the
25 amount of decay heat that's going on.

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1 So, we've determined without heat transfer
2 out, it's fine for the three minutes, and then, we
3 transfer to the dump tank. And within the dump tank
4 there is enough surface area and cooling capability
5 from the light water pool.

6 MEMBER MARCH-LEUBA: Yeah, let me see if
7 I can express it in the way I think about it, and you
8 tell me if I'm correct or not.

9 I think that this dumping of the TSB
10 solution is not a reactor protection system function,
11 but an emergency core cooling system function. It's
12 equivalent to turning the ECCS pumps in an operating
13 reactor. So, it's a long-term decay heat removal
14 issue. Is that correct?

15 MS. RADEL: That is correct.

16 MEMBER MARCH-LEUBA: Yeah. And on
17 operating reactors, ECCS sometimes doesn't even come
18 on. And all time -- every single occasion -- they
19 come with a significant delay. So, this is not
20 inconsistent with operating reactors. That's the way
21 I see it.

22 CHAIR BALLINGER: Okay, thank you.

23 MEMBER DIMITRIJEVIC: Okay, well, this is
24 Vesna Dimitrijevic. I look on this from a slightly
25 different perspective. So, let me ask you again,

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1 which of the two, on the loss of offsite power, which
2 breakers open automatically? The breakers to which
3 buses?

4 Because -- okay, so I'm going back to the
5 breakers, and I will get back to thermal hydraulic.
6 You said that the loss of offsite power, he only has
7 to close two breakers to de-energize buses. Which are
8 those two breakers?

9 MR. BARTELME: Those are the main breakers
10 for services A and services B into the building.

11 MEMBER DIMITRIJEVIC: Okay, so those are
12 the only two breakers, the UP breaker 1 and UP
13 breaker 2, that open on loss of offsite power, right?

14 MR. BARTELME: Correct, for the building.
15 There's are the UP breaker 3 and 4 out at the chiller
16 farm, for the chillers. Those also would be very
17 similar. Those also would need to be reset.

18 MEMBER DIMITRIJEVIC: Okay. So they will
19 automatically, just as loss of the power, they will
20 automatically open. Now, let's say that you get power
21 very fast, in the matter of seconds. That will be
22 procedure, right? Telling the operators to close
23 those breakers. Right?

24 MS. KOLB: Yes.

25 MEMBER DIMITRIJEVIC: But then, before he

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1 closes these breakers, he has to check the loads also
2 disconnected. Right? He's not going to close
3 breakers on loaded buses, right?

4 MR. THOMAS: No. The system is
5 designed -- I'm sorry, this is Roger Thomas, Lead
6 Electrical Engineer for SHINE.

7 MEMBER DIMITRIJEVIC: Right.

8 MR. THOMAS: So, they would be closing, on
9 a momentary thing like that, into load. Now, a lot of
10 those loads will close themselves off. Major loads
11 like the chillers and stuff have their own restart
12 cycles. So, you have substantially reduced load of
13 the auxiliary systems.

14 MEMBER DIMITRIJEVIC: Okay, so in your
15 visualization, if he wants to get back the primary
16 cooling, so he will first check the status of the
17 loads, close those two breakers, and then has to go
18 and close the breakers on the primary cooling pumps.
19 Right?

20 MR. THOMAS: No, those would still be in
21 the original state. They would have --

22 MEMBER DIMITRIJEVIC: So, you mean the
23 pumps will just automatically load on the buses?

24 MR. THOMAS: Correct. They would stay in
25 the same state. They are on VFDs, so there would be

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1 a soft start to them. But they would restart on
2 return of the power.

3 MEMBER DIMITRIJEVIC: Well, that's a
4 very -- well, at the same time you are loading, in the
5 loss of power, your standby generator will start
6 loading. Right? So, which will assume also that you
7 are disconnecting loads before your load your standby
8 generator.

9 So, I mean, when you guys thought about
10 these three, did you went through this procedure what
11 operator actually have to do to get those pumps back
12 running?

13 MS. KOLB: We looked at the design. The
14 (unintelligible) procedure is still in draft.

15 MEMBER DIMITRIJEVIC: I understand that.
16 But I just want to say, because what is happening in
17 the loss of offsite power event is really sort of like
18 complicated scenario, where you have your standby
19 generator loading.

20 You have to think about this off-gas
21 system, nitrogen purge. There's so many different
22 timings there. So, I just want to see if anybody
23 brought the timeline, and had to visualize picture,
24 how would that work from procedure? That's one of my
25 concerns.

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1 Because I couldn't see nearly all of this
2 working out and happening in three minutes.

3 MEMBER BROWN: Vesna, can I inject
4 something. This is Charles.

5 MEMBER DIMITRIJEVIC: Sure. Sure.

6 MEMBER BROWN: When you lose offsite power
7 from Alliant, theoretically, our SGS starts and the
8 breakers, like you say, UP breaker 1 and 2 trip open,
9 as well as 3 and 4, but now your SGS is on, so your
10 buses are being supplied from another generator.

11 So, it's more complicated than just having
12 those breakers come back. And they can't
13 automatically do anything until you synchronize them
14 and transfer load.

15 MEMBER DIMITRIJEVIC: Right.

16 MEMBER BROWN: Unless you de-energize
17 everything first, and then reapply the Alliant power.
18 So, this is a more complicated layout and was one of
19 the reasons for my questions about how these breakers
20 are interlocked.

21 Well, it's to the DC loads, which are
22 picked up and are still running, theoretically. So,
23 this is not as straightforward as it sounds. And
24 there's no discussion of restart and how loads behave
25 in the description.

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1 So, that's one of the questions I asked.
2 We didn't explicitly cover that, although it's implied
3 in one of my comments, relative to safe shutdown and
4 loss of offsite power.

5 So, it's a little more complicated if
6 you've got -- you just can't apply Alliant power back
7 once you've got all those other AC loads running on
8 the SGS.

9 Even if it's a momentary loss of Alliant,
10 there's no discussion of -- is there a time delay
11 before the SGS starts? Does it wait for two minutes
12 or one minute?

13 Well, you've got to be careful, because
14 you're stripping loads down in the rest of the plant.
15 There's three- and five-minute walkaway load strip
16 situation.

17 It just seems to me this ought to be
18 enumerated or explained a little bit more than the
19 discussion.

20 MEMBER DIMITRIJEVIC: But based on the
21 analysis, ATS starts loading within one minute, and
22 finish transfer in five minutes. That's what the
23 assumptions around loss of offsite power.

24 So, basically, you see what we are sort of
25 asking in cooling nuclear plans. That is, the cavity

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1 of offsite power is always credited, and it could be
2 in different time frames.

3 Unfortunately, usually there is no
4 operator action associated with that. These operator
5 actions can be complicated. And we didn't really
6 learn too much about that through the operating
7 plants. So, this is what was our concern, because it
8 happened here, it has to be done within three minutes,
9 and it didn't really seem -- so, my question for your
10 thermal hydraulic catalyzer, so this is your
11 maximum -- I know Jose looked like, in your thermal
12 hydraulic catalyzer said -- I did too conclude that
13 that would not be boiling in three minutes.

14 But what is your maximum time frame before
15 you have to dump? Is it three minutes? Or would that
16 be a boiling in four minutes?

17 MS. RADEL: So, this is Tracy again. The
18 analysis is very simplified and has quite a bit of
19 margin in it. We did not define an exact amount of
20 time it could go beyond that.

21 We didn't calculate it out to what the
22 maximum time was. It was a calculation to confirm
23 that three minutes was safe and the safety system will
24 open the valves at that point and drain the solution.

25 So, we don't have a number on the amount

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1 of time that it could potentially stay within the
2 unit.

3 The other aspect of that analysis is
4 assumed to start at the high-temperature limit of the
5 solution at the start of that analysis, versus an
6 actual expected temperature of the solution. So,
7 there's significant margin in there as well. But we
8 haven't defined a specific time.

9 DR. BLEY: Aren't you depending upon those
10 three-minute and five-minute load-stripping evolutions
11 to actually be accomplished though, to meet this
12 walkaway situation?

13 MS. RADEL: The three-minute opening of
14 the dump valves is within the safety system. So, the
15 safety system will initiate an IU cell safety
16 actuation after three minutes of having lost the PCLS
17 flow, and open those valves. And that is going to
18 happen whether or not there's power, or whatever is
19 happening within the facilities.

20 DR. BLEY: So, if the three-minute time
21 delay does not strip, you're saying the safety system
22 will take action anyway. That's what I got out of
23 your discussion.

24 MS. RADEL: Yeah, so it's not related to
25 the load-stripping at all off of the UPSS. These are

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1 actuated by the safety system.

2 DR. BLEY: One of my comments that we
3 haven't gotten to yet but it's relevant to this
4 discussion, was you're talking about a safe-shutdown
5 configuration at which you arrive under these
6 circumstances, and you called it walkaway.

7 And what you've gone through in this
8 discussion is a more complex iteration of what's going
9 on. And all I was looking for, relative to my last
10 bullet, was what's the definition, and what has to
11 occur to accomplish that safe-shutdown configuration?

12 In other words, write it down inside
13 whichever the appropriate document is, whether it's
14 chapter 8 or not. Because you didn't define
15 explicitly what that configuration was, other than
16 orally. So, I'm just throwing that in --

17 (Simultaneous speaking.)

18 DR. BLEY: Excuse me, Vesna. Go ahead.

19 MEMBER DIMITRIJEVIC: Yeah. Are you
20 planning to address -- okay, so this is a separated.
21 So, this loss of the primary water flow, and it's in
22 the pattern of your stripping and the time
23 requirements, table 88221.

24 So, are you planning now to address
25 Charlie's concerns?

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1 MS. KOLB: Before we go into this -- this
2 is Catherine Kolb. We do define safe-shutdown in our
3 proposed technical specifications. That should be
4 where we define that term.

5 And then, just to clarify, I think some of
6 the complication of this discussion we've been having
7 is because we were postulating on how we would recover
8 after a loss of offsite power. A momentary one that
9 then returns.

10 Yes, that does become more complicated
11 than the safe-shutdown condition, which you wouldn't
12 be attempting this, because we -- and this is
13 essentially what we're attempting to operate again,
14 versus getting to not operating, if that makes sense.

15 MEMBER BROWN: I would suggest that
16 burying -- that's the wrong word -- incorporating the
17 safe-shutdown condition definition in the tech specs
18 is somewhat obscure.

19 And yet, you can talk about how you need
20 to accomplish that in not only this chapter, but
21 others. But it seems to me it ought not be just
22 limited to that, unless you want to reference it
23 somehow in chapter eight or the other chapters that
24 are necessary.

25 That's just an obscure reference and

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1 assumes somebody's read though every one of the tech
2 specs to figure out what that is. So, just a
3 suggestion.

4 MEMBER DIMITRIJEVIC: Well, we were so far
5 discussing one of those things expressing concerns.
6 But there is also additional comments by Charlie. Is
7 the SHINE ready to discuss those one-by-one? Or you
8 are just planning to discuss this three-minute?

9 MR. BARTELME: We're also prepared to
10 discuss Member Brown's recommendations as well. And
11 we can move on to those now if we're ready to sort of
12 move on.

13 MEMBER DIMITRIJEVIC: Okay. All right,
14 that's fine. That's what I wanted to hear and I'm
15 thinking about that. Can you please go through
16 Charlie's comments now.

17 MEMBER MARCH-LEUBA: Can we stay on this
18 topic for another two minutes?

19 MR. BARTELME: Sure.

20 MEMBER MARCH-LEUBA: Yeah. If I
21 understand correctly -- this is a question for
22 SHINE -- (audio interference) .7-4, which ostensibly
23 shows the TSV solution temperature as function of time
24 following a loss of power.

25 If I read that correctly, the culmination

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1 of the 180-second time delay, the temperature, the
2 TSV, raises but a couple of degrees Celsius. Am I
3 reading correctly? I don't know if you have access to
4 those figures.

5 MS. RADEL: Yes, that is correct.

6 MEMBER MARCH-LEUBA: Yeah, so the dotted-
7 blue line, if the initial temperature, which is -- and
8 this is non-proprietary, because it comes from the
9 FSAR -- is 87 degrees, and the yellow line is the
10 182nd. It reaches like 88. Like, it only heats up
11 like one degree C over 180 seconds.

12 But when I finally understood what this
13 figure meant, that 180 second was of no safety
14 significance. As long as you dump it, you're not
15 overheating. The power density's so small.

16 So, from the thermohydraulic point of
17 view, I don't see any problem. That was my
18 conclusion.

19 MS. RADEL: So, I just want to clarify and
20 walk through the figure and make sure we're
21 understanding the same things here.

22 So, the figure is showing the temperature
23 profile --

24 MEMBER DIMITRIJEVIC: Why is this picture
25 is not proprietary?

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1 MS. RADEL: Oh.

2 MEMBER DIMITRIJEVIC: Because I also have
3 the problem understanding this when I was looking at
4 that.

5 MS. RADEL: Yes, so I'll share a screen
6 here.

7 MEMBER MARCH-LEUBA: Yeah, I apologize.
8 I cannot show you, because I have it on the wrong
9 computer.

10 MS. RADEL: It will just take a second
11 here. Trying to adjust screens.

12 MR. BARTELME: Can everyone see the figure
13 now?

14 MEMBER MARCH-LEUBA: Yes. Yes, we can see
15 now.

16 MS. RADEL: Okay. So, this figure, this
17 graph, is showing the temperature profile through the
18 TSV dump tank after we've dumped the solution.

19 So, node one is located on the inner shell
20 of the dump tank, and node 100 is on the outer
21 surface, the outer shell of --

22 MEMBER MARCH-LEUBA: Can I interrupt you
23 before you go? Because I thought the figure captured
24 in the SFAR, I hope is incorrect. Because on your
25 document that you provided in the box, which is (audio

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1 interference) is CALC-2018-0037, rev. 1.

2 That (audio interference) line two, which
3 has the same data, but the label is target information
4 temperatures, as function of location of selected
5 times. On the FSAR, you say it's the dump tank
6 temperature. Which of the two is it?

7 MS. RADEL: This is the target solution
8 temperature, the temperature through the target
9 solution. So, this one through 100 is a spatial --

10 MEMBER MARCH-LEUBA: If I miss just then,
11 I don't know if you can still modify the final
12 revision of the FSAR.

13 Make sure 092 on the CALC-2018-0037 agrees
14 with the caption here, because this caption is
15 confusing.

16 This caption tells me that's the dump tank
17 temperature, when it really is a TSV temperature.

18 MS. RADEL: It's the target solution
19 temperature within the TSV dump tank. So, it is
20 not --

21 (Simultaneous speaking.)

22 MS. RADEL: -- the temperature in the TSV.
23 So, I can walk you through -- let me walk you through
24 the figure here.

25 So, the analysis that we did provide for

1 review starts with the target solution in the TSV at
2 the maximum temperature, which is an average target
3 solution temperature of 80 degrees C.

4 It then takes the three minutes of time
5 delay, as well as -- and I'll have to look at the
6 table to make sure I get this right -- it takes a
7 total of 210 seconds worth of time following shutdown,
8 because we do open the driver breakers as soon as we
9 lose flow.

10 So, the driver is turned off as soon as we
11 lose flow. And then it takes all of the energy
12 available from decay heat, from delayed neutrons, and
13 any fission that's still occurring in the system, for
14 the duration of 210 seconds following the shutdown.

15 That includes the 180 seconds, or the
16 three-minute delay, as well as the one-second response
17 on the flow measurement, and the 500 milliseconds for
18 the safety system, and the two seconds for the dump
19 valves, and some additional margin.

20 And it assumes that all of that energy is
21 deposited in the target solution, without any cooling
22 occurring. It assumes flow has completely stopped and
23 that energy is all converted into heat in the target
24 solution.

25 And that takes the target solution from

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1 80 degrees C to approximately 87 degrees C. It then
2 is transferred into the dump tank, and we do account
3 for the time it takes to dump as well.

4 And this graph starts once it's in the
5 dump tank. So, this is the graph of temperature
6 profiles through -- of the target solution in the dump
7 tank once it has entered the dump tank.

8 So, the 420 seconds is the start of when
9 all the solution is in the dump tank, and it's gotten
10 up to 87 degrees from the original 80 degrees at this
11 point.

12 And then, we're looking at how the light
13 water pool cools the solution and prevents the peak
14 temperature from reaching the 90 degrees.

15 MEMBER MARCH-LEUBA: Okay. So then, I
16 still don't understand why we waiting
17 420 seconds -- this is Jose -- 420 seconds to dump the
18 solution, instead of 180.

19 MS. RADEL: So, to account for all the
20 different delays and timing in a conservative way.
21 And so, we have 180 seconds for the delay, we have one
22 second for the flow measurement, 500 milliseconds for
23 the logic solver, two seconds before we open the dump
24 valves, and then we have the time it takes to dump the
25 solution, we conservatively assume that one of the

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1 dump valves fails to open as well on top of that.

2 And we take that amount of time and assume
3 that no cooling of the solution occurs in that
4 420 seconds.

5 MEMBER MARCH-LEUBA: So, mostly the
6 difference is the time for the solution to flow down
7 to drip through the valve into the lower tank.

8 MS. RADEL: Correct. Yes, the drain --
9 (Simultaneous speaking)

10 MEMBER MARCH-LEUBA: And even it's a 420-
11 second delay before you start cooling it in the dump
12 tank, your temperature rise by seven degrees C, and
13 remain below (audio interference).

14 MS. RADEL: Correct.

15 MEMBER MARCH-LEUBA: Okay.

16 MEMBER PETTI: And, Tracy, just to
17 confirm, there's no convection in the solution. It's
18 just conduction?

19 MS. RADEL: I would have to go look and
20 see the analysis.

21 MEMBER PETTI: These look an awful lot
22 like Bessel functions to me, or some modified Bessel
23 function. And that would imply it's conduction only.
24 Convection would smooth everything out, I would think.
25 Maybe I'm wrong.

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1 MS. RADEL: You're probably correct. I
2 just would have to go to the analysis to confirm.

3 MEMBER PETTI: Okay, thanks.

4 MEMBER MARCH-LEUBA: But, bottom line,
5 we're talking about the 180-second delay, where it is
6 concerned about how much margin we have.

7 So, even assuming this 420 seconds to dump
8 the tank, you only reach 87 degrees C, which is below
9 boiling. And apparently we have roughly a margin of
10 two or more?

11 So, we have taken 800, 1,000 seconds
12 before we have reached -- no, more than that. Like,
13 a factor of C?

14 MS. RADEL: Yes. And as I noted as well,
15 we start the analysis with all of the target solution
16 at 80 degrees C, which is significantly above our
17 maximum expected operating temperature.

18 (Simultaneous speaking.)

19 MEMBER MARCH-LEUBA: These calculations
20 are run at tech spec limits, because you're allowed to
21 operate a daily. You should prove that you're okay at
22 daily.

23 I don't think that's a conservatism. This
24 is realism, but I'm not a conservatism in safety
25 analysis. But even with that extreme temperature in

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1 tech spec limits, you only reach a maximum temperature
2 of 87 in 420 seconds.

3 So, you could have waited a thousand
4 seconds and it still would not have boiled, in my
5 opinion. I'll stop there. I don't have any problems
6 with this. I think I understand now what we're
7 looking at here.

8 MEMBER DIMITRIJEVIC: Okay, maybe then we
9 can continue with addressing Member Brown's comments.

10 MR. THOMAS: Sure. And the first comment,
11 it was specified that the offsite AC power sources
12 come from two different, and thus, independent,
13 aligned utility substations.

14 I do want to point out we do note in
15 subsection 8A2.1.2 of the SR, we identify the two
16 substations in which these sign-offs, like power
17 feeds, originate. It does mention the Alliant Energy
18 trip road substation and the venture substation, the
19 Alliant Energy venture substation.

20 MEMBER BROWN: Where is that?

21 MR. THOMAS: Subsection 8A2.1.2 of the SR.

22 MEMBER BROWN: Okay. I guess I was asleep
23 when I read that. I'm just teasing you. I really
24 wasn't asleep.

25 MR. THOMAS: Okay.

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1 MEMBER BROWN: You said 8A2.1.2?

2 MR. THOMAS: Yes.

3 MEMBER REMPE: And I assume that that's
4 not a more recent version that has been in the FSAR
5 for a long time?

6 MEMBER BROWN: No, that's the one we had
7 for review.

8 MEMBER REMPE: Well, there have been
9 updates to some sections of the FSAR, and I just
10 wanted to make sure that maybe Charlie had an older
11 version, or not. Has there been any change?

12 (Simultaneous speaking.)

13 MR. BARTELME: Not a recent revision from
14 an earlier revision that went in earlier this year in
15 January. I don't know if that was original, the
16 Rev. 0, when we submitted it in 2019. But it has been
17 in there for a while.

18 MEMBER BROWN: I've got Rev. 3, and that's
19 where it shows -- are those -- second question that I
20 didn't ask, the Alliant power source electric plant
21 iteration, is that a single generator operation of the
22 two? Are these two substations out of phase? Or do
23 we know that? It doesn't matter, I'm just curious.

24 MR. BARTELME: Yeah, we have not had
25 conversations with Alliant as to the exact location of

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1 all the different power generators.

2 (Simultaneous speaking.)

3 MEMBER BROWN: Okay. They make up the same
4 generator or not, is all you're saying.

5 MR. BARTELME: Correct.

6 MEMBER BROWN: Okay. All right, thank
7 you. Well, let me make a note so I know I got an
8 answer here.

9 CHAIR BALLINGER: Okay, can we push
10 forward a little bit?

11 MR. THOMAS: Okay. Second recommendation
12 is to revise a couple of figures in chapter eight,
13 figures 8A2.1.

14 8A2.1-1 and 8A2.2-1, to show the power
15 supply of 125 volt DC UPSS Charlie, not hard-
16 connected, but optioneered. As we discussed back in
17 May, those figures are the simplified depictions of
18 the normal electrical power system and the
19 uninterruptible electrical power system -- the NPSS
20 and the UPSS -- are provided in those two referenced
21 figures, to indicate the auctioneered power provided
22 to Division Charlie from Divisions Alpha and Bravo.

23 Well, the simplified depiction in those
24 figures doesn't clearly indicate the auctioneering.
25 The auctioneering of that power is described elsewhere

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1 in the SR, subsection 7.4.3.4 of the SR --

2 (Simultaneous speaking.)

3 MEMBER BROWN: Okay, the INC section?

4 MR. THOMAS: Yes, yes. -- discusses the
5 powering of TRPS divisions. It states, TRPS Division
6 Alpha is powered from Division Alpha of the UPSS.
7 TRPS Division Bravo is powered from Division Bravo.
8 The UPS test and TRPS Division Charlie received
9 auctioneered power from Division Alpha and Division
10 Bravo, of the UPSS, and we've got similar statements
11 in a couple of other chapter seven subsections about
12 that auctioneered power to the Charlie Division.

13 MEMBER BROWN: Okay, what section did you
14 say?

15 MR. THOMAS: 7.4.3.4.

16 (Simultaneous speaking.)

17 MEMBER BROWN: All right, that's good.
18 That's fine. It's there, I just wanted it talked
19 about and you all did.

20 MEMBER REMPE: This is Joy. And tell me
21 again about the two substations you mentioned?
22 Because I've got a 2.1.2. And again, I'm not sure
23 what version I have, because they don't label it,
24 unfortunately.

25 But it says that the feeder originates

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1 from the Alliant Energy trip road substation,
2 singular.

3 MEMBER BROWN: And then, it goes on and
4 talks about the Alliant Energy venture substation.

5 MEMBER REMPE: I don't see -- I mean,
6 there's only two paragraphs in 8A2.1.2, in my version.

7 MEMBER BROWN: What revision do you have?
8 Go down to the bottom of the page. Bottom of the
9 page. Rev. 3.

10 MEMBER REMPE: Oh, I have an older
11 version. Yours does have --

12 MEMBER BROWN: Yeah, they're good.
13 They're fine. They've answered my question.

14 MR. BARTELME: Yeah, the current revision
15 of Section 8A2.1 is revision three. And you see that
16 in the bottom right-hand corner of each page of each
17 section.

18 MEMBER REMPE: I see that now. Thank you.

19 MR. BARTELME: Okay. All right, and then,
20 Member Brown, a couple of other, 7.5.2.2.4, and
21 subsection 7.5.3.3, another couple of mentions of that
22 auctioneered power in chapter seven.

23 MEMBER BROWN: 7.5.2.2.4?

24 MR. BARTELME: Yep.

25 MEMBER BROWN: And which is the other one?

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1 MR. BARTELME: 7.5.3.3.

2 MEMBER BROWN: Okay. And just for me,
3 when I keep going into chapter seven, I just want to
4 have those notes to look at them.

5 MR. BARTELME: And then, there's a similar
6 discussion of the powering of the Division Charlie of
7 the Neutron Flux Detection System, NFDS, in 7.7.1.3.3.

8 MEMBER BROWN: 7.7. --

9 MR. BARTELME: 1.3.3.

10 MEMBER BROWN: And that's for the NFDS
11 power?

12 MR. BARTELME: Yes.

13 CHAIR BALLINGER: Now, this is Ron.
14 Today, I think we got -- or I've noticed that we got
15 a revision to the FSAR, chapter seven. When Charlie
16 looks at this, does he need to have that revision?

17 MEMBER BROWN: What revision are you
18 talking about? All I've got is Rev. 3.

19 MR. BALAZIK: This is Mike Balazik, NRC
20 Staff. Yes, we just received a revision on chapter
21 seven from SHINE, and we'll provide that to ACRS.

22 MEMBER BROWN: Is that a complete
23 revision, or just add-ons and changes that you have to
24 find or search your way through a forest of trees?

25 CHAIR BALLINGER: It's a redlined

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1 version --

2 (Simultaneous speaking.)

3 CHAIR BALLINGER: -- but it's all related
4 to the pics.

5 MEMBER BROWN: Is it a complete chapter?

6 MR. BARTELME: It is not a complete
7 chapter. Now, what we submitted over the last couple
8 of weeks have been mark-ups reflecting design changes
9 and discussions from regulatory audits, and they're
10 mark-ups of the complete chapter that was last
11 provided in January.

12 MEMBER BROWN: Okay. Do you have to think
13 revision three, and then try to integrate this into
14 that to gain an understanding? Or is it a whole
15 chapter, or just the redlined markups in it?

16 MR. BARTELME: It's not a full chapter
17 with redlines. It's what you mentioned, sort of the
18 January submittal, plus then the mark-ups that have
19 been submitted since.

20 MEMBER BROWN: Okay.

21 CHAIR BALLINGER: You just need to be
22 playing with a full deck.

23 MEMBER BROWN: I've never played with a
24 full deck in my life, Ron, so -- okay.

25 CHAIR BALLINGER: Okay, let's keep going.

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1 Let's keep going.

2 MR. BARTELME: Okay, so the third
3 recommendation, revised -- same figures, 8A2.1.1 and
4 8A2.2.1, to show that ACUPSS Charlie is shown to be
5 connected by interlock, either/or AC circuit breakers
6 not hard-connected as shown.

7 It's, again, like at the DC level above
8 each of those figures, powered ACUPSS Charlie's
9 auctioneered from the Alpha and Bravo buses. Again,
10 those figures are the simplified diagrams, and the
11 mechanisms for auctioneered net power to Division
12 Charlie buses are not represented in the figure,
13 despite those descriptions we identified in the last
14 recommendation. The descriptions of the auctioneered
15 power is being provided elsewhere in the SR.

16 MEMBER BROWN: You're talking about the AC
17 comment?

18 MR. BARTELME: Yes.

19 MEMBER BROWN: The third thing?

20 MR. BARTELME: Yeah. Yeah.

21 MEMBER BROWN: Well, that's AC. You don't
22 auctioneer AC. You either supply it from one source
23 or another.

24 MR. THOMAS: I'm sorry, this is Roger
25 Thomas, Electrical Engineer for SHINE. I don't

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1 believe auctioneering is necessarily a defined
2 definition anywhere that I could find.

3 So, we use it sort of generically for both
4 AC transfer switches and DC sort of dialed voting
5 system.

6 MEMBER BROWN: Well, I've spent 50 years
7 doing this, and it was always automatic bus transfers
8 is how they were referred to if you supply two
9 different sources from AC. Not auctioneering.

10 Auctioneering has always been, in my mind
11 in my lifetime, has always been DC. I understand your
12 point, but I guess I would disagree with you in terms
13 of the definition.

14 I just wanted to make sure it's clear
15 somewhere. It doesn't say anything, just two straight
16 lines. So, I'm paralleling two differing sources,
17 potentially, depending on what's going on in the plan.

18 DR. BLEY: So, to that discussion, when
19 you say it's an auctioneered AC source, does that mean
20 that there's an automatic bus transfer that's what's
21 happening?

22 MR. BARTELME: Correct. Correct.

23 MEMBER BROWN: Why didn't you say so.
24 That's the point of the comment.

25 MR. BARTELME: Understand. And we can --

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1 some of these recommendations, we'll look at revisions
2 we can make to the SR to clarify these items.

3 MEMBER BROWN: I know what it is. It's
4 just making sure it's documented. That's all. It's
5 an AVT-type operation. That'll satisfy me.

6 CHAIR BALLINGER: Okay, let's go.

7 MR. BARTELME: I sent recommendation-
8 revised table 8A2.2-1, the UPS load-less, to identify
9 which UPSS each load is attached.

10 Clarification we want to provide here is
11 that tables 8A2.2-1, EPS load-less, and the battery
12 sizing table that follows, table 8A2.2-2 of the SR,
13 identify which loads are powered by the divisions
14 Alpha and Bravo of the UPSS.

15 UPSS Division Charlie is provided solely
16 to power the INC loads where a third division is
17 provided. That's where the third division is provided
18 within TRPS, FSAS or NFDS.

19 A subset of the load descriptions are
20 already provided in those chapter eight tables. We
21 didn't see a need to provide sort of an explicit
22 listing of loads powered by Division C in those
23 chapter eight tables.

24 MEMBER BROWN: So, those aren't important?
25 I mean, I saw the Table A, the UPS A and the UPS B.

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1 I did not see UPS C anywhere. And you're saying it's
2 not. Is that correct? It's not defined what those
3 are.

4 MR. THOMAS: The loads for UPS C are
5 incorporated in both the loads of A and the loads of
6 B because of the auctioneering aspect. We had to
7 support those loads all --

8 (Simultaneous speaking.)

9 MEMBER BROWN: Okay, I got it.

10 MS. RADEL: And this is Tracy. Just to
11 clarify, there's not a UPSS C. So, it's just taking
12 from A and B, and recounted for the loads on both A
13 and B.

14 MEMBER BROWN: Well, UPSS C is a load
15 thing. I mean, it's a bus. And you're just saying
16 that the load, regardless of what they are, they're
17 incorporated -- I'll look at the load table. Does
18 that mean A and B have an increased load demand based
19 on potentially supplying that particular load?

20 MR. THOMAS: Correct. We had to make sure
21 there was enough margin. And, for instance, UPS A
22 they have all of the UPS A loads, plus all of the
23 UPS C loads.

24 MEMBER BROWN: Okay. It would be nice to
25 have a note at the bottom of your table that says

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1 UPS C loads are incorporated in UPS A and B. That was
2 just not clear, that's all. I said it would be nice.

3 MR. BARTELME: I understand. The next
4 recommendation, a request to revise Section 8A2.2,
5 state that the natural gas for the standby generator
6 system, supplied from an offsite utility service,
7 natural gas supplier, acknowledge that the
8 descriptions in Section 8A2.2 do not explicitly state
9 the source of the fuel for the natural gas-driven
10 generator.

11 The hazards associated with the onsite
12 natural gas pipeline were considered in chapter two,
13 so probably the hazard analysis of this feeder line
14 from the offsite utility. But because the standby
15 generator system provides a defense-in-depth and an
16 acid protection function not relied to protect public
17 health and safety, so I just didn't see this as a
18 necessary design detail to be included in the FSAR.

19 MEMBER BROWN: Well, you've got to get gas
20 from somewhere. I mean, it's just a big hole. I
21 think you have to discern that from some other
22 chapter.

23 Otherwise, you immediately start thinking,
24 well, where do I get my gas? And where are the tanks
25 has got to be supplied in it and how do I consider it?

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1 That just seems to be a big hole.

2 (Simultaneous speaking.)

3 DR. BLEY: Is it a field decision for
4 whoever's doing the construction, to just pick it?

5 MR. BARTELME: No. The design considers
6 the feeding of the natural gas from the utility, and
7 that it's communicated in the construction drawings
8 and work packages and such, and the utility
9 installation.

10 It's included in the design. It just
11 wasn't determined to be a necessary level of detail to
12 be provided in the FSAR.

13 MEMBER BROWN: Well, in the FSAR, we'd
14 normally consider, if you've got onsite, then you've
15 got one set of considerations. You've got offsite,
16 you've got something else, relative to the overall
17 safety analysis.

18 It seems a natural place to put it since
19 the SGS is the backup power source and it gets power
20 from a utility service, not an onsite.

21 I can't tell you what to do, but that
22 seems to be a -- ought to be made clear that it's an
23 offsite source, not an onsite source.

24 MR. BARTELME: Okay, understand.

25 MEMBER KIRCHNER: This is Walt Kirchner.

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1 To Charlie's point, the problem with using natural gas
2 from offsite is you don't have control. That you're
3 depending on that utility, that supplier.

4 You don't have storage, vis-a-vis diesel
5 generators or using jet fuel to fire a gas turbine.
6 So, it is an important issue in terms of reliability
7 and dependability, in terms of relying on that source
8 of backup power.

9 MR. BARTELME: Understand.

10 CHAIR BALLINGER: This is Ron Ballinger.
11 To that point, where I live the gas company literally
12 has a triage system in the winter, where certain
13 customers can be cut off before others.

14 You have a similar system where you guys
15 are going to be? It gets pretty cold in the winter up
16 there.

17 MR. THOMAS: This is Roger Thomas from
18 SHINES. My understanding from the discussions with
19 Alliant, you would have to opt for a certain type of
20 service that allows them to cut you off. So, it would
21 be an intermittent service kind of thing.

22 CHAIR BALLINGER: Yeah. But they would
23 have to let you know.

24 MR. THOMAS: Correct. And again, it's not
25 a safety-related system. We made that decision based

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1 a lot on talking with them about the reliability of
2 their service and expectations of being cut off for
3 things like that.

4 MEMBER BROWN: How often are you going to
5 test if this thing automatically starts when you need
6 to, and so you know the gas is there?

7 MR. THOMAS: The standard for testing it
8 is typically once a month. But we also use that gas
9 service for our boilers. And so, we will be
10 monitoring that far more often than once a month.

11 MEMBER BROWN: Obviously, you know it's
12 running. The boiler's running for heat and stuff like
13 that, for site services?

14 MR. THOMAS: Correct.

15 MEMBER BROWN: Okay.

16 CHAIR BALLINGER: Okay. Whoops, sorry.
17 Can we push on?

18 MEMBER REMPE: Can I ask Mike to talk a
19 little more about -- you've discussed this with them
20 and they are going to get service that allows it to be
21 cut off? Is that what you said?

22 MR. THOMAS: No. We would have to opt for
23 that type of contract.

24 MEMBER REMPE: And you're not going to do
25 that. You're going to have a contract that is always

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1 on, is what you're telling me. Right?

2 MR. THOMAS: Correct, barring some kind of
3 disaster where they have a service interruption.
4 Somebody back (audio interference), the whole gas
5 material.

6 MEMBER REMPE: Okay, and then your
7 discussion with Mike or with the staff, was it
8 documented somewhere, like in an RAI? Or it was just
9 informal meetings it was discussed?

10 MR. BARTELME: Which discussion with the
11 staff?

12 MEMBER REMPE: I think Mike came on and
13 said he discussed it with SHINE. Right? I saw his
14 little circle flash.

15 MR. BORROMEO: So, this is Josh Borromeo.
16 I'm not sure we had this discussion. I mean, this is
17 a non-safety-related backup system. And this might be
18 a level of detail that we wouldn't typically require
19 in an FSAR. So, I mean, we'll certainly take it under
20 advisement. But --

21 MEMBER REMPE: I thought Michael
22 Balazik --

23 MR. BORROMEO: Oh, Michael --

24 MR. BALAZIK: No, Dr. Rempe, I didn't say
25 anything. It might have been somebody else that was

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1 discussing it earlier.

2 MEMBER REMPE: Oh. Okay, you're --

3 (Simultaneous speaking.)

4 MR. BALAZIK: I think that was a member
5 from SHINE that was discussing that.

6 MEMBER REMPE: Okay, sorry. You're circle
7 flashed and I thought it was you talking. Sorry.

8 MR. BARTELME: So, the last recommendation
9 in the list here, incorporate a definition of safe
10 shutdown configuration under loop conditions.
11 Response to the question.

12 SHINE stated that the plan is walkaway
13 safe when a redundant TC battery backup systems, there
14 are three-minute and five-minute stripping of loads.

15 We touched on this previously. We do
16 provide a definition of safe shutdown, a condition in
17 the SHINE technical specifications for the irradiation
18 units. It's a defined term in the front matter of the
19 tech specs.

20 And one thing we do want to clarify in
21 this response as well is, it kind of related to the
22 walkaway safe. Under loop conditions -- and Catherine
23 touched on this earlier -- with respect to the
24 operations personnel, would remain in the control room
25 and monitor condition of the facility, including

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1 confirmation that the appropriate load sheds had
2 occurred, the UPSS system.

3 So, the walkaway safe condition, there
4 would be personnel in the control room monitoring the
5 status of the facility and the --

6 MEMBER BROWN: My only concern is the tech
7 specs were at odds to your place to put the definition
8 of safe-shutdown configuration, that a definition is
9 supplied in the chapter under definitions section, is
10 a far better place to put it, so people know what
11 they're looking at when they go through and read this
12 or are considering the design aspects of the thing.

13 Can't make you do it. That's just an
14 obscure place to put it. I would have never thought
15 to look at the tech specs to find out what the safe
16 shutdown configuration is.

17 MEMBER DIMITRIJEVIC: Also, I mean, I
18 don't know. I mean, after six hours, they will not
19 have any instrumentation to monitor anything. Right?
20 Based on your load stripping things, right? Because
21 even this monitoring three-team sources and things
22 like that, this instrumentation is not going to be
23 available after six hours. Right?

24 (Simultaneous speaking.)

25 MS. KOLB: This is Catherine. Yes, that's

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1 correct. If the non-safety standby generator is not
2 functioning and its power was not restored, we are
3 relying solely on the safety-related, uninterruptible
4 power supply system. And yes, the batteries would run
5 out after six hours, at minimum.

6 MEMBER BROWN: Is that stated in the
7 chapter? I missed that if I did. The six-hour time?

8 MS. KOLB: The minimum required times for
9 the loads on the UPSS are in chapter eight.

10 MEMBER BROWN: Yeah, okay. Yeah, I see
11 the six hours. Okay, it's in table 8A2.2-1? That's
12 where I saw the six hours.

13 MR. BARTELME: Yeah, one of those two
14 Section 8A2.2 tables, either table one or two.

15 MEMBER BROWN: Okay.

16 MR. BARTELME: 8A2.2.

17 MEMBER BROWN: So, to take Vesna's point,
18 I was thinking about the six hours, and this is the
19 answer. So, after six hours, if you don't get power
20 from either the SGS and no restoration of Alliant,
21 what's the circumstances of the plant?

22 I took the comment from the previous
23 subcommittee meeting, this was literally a walkaway.
24 You could go home and have a beer -- don't take that
25 literally -- and the plant would be safe, regardless

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1 of six hours, twelve hours, or 24 hours. Is that
2 correct or not correct?

3 MS. KOLB: So, the design, there's nothing
4 that needs to be required, either during that six
5 hours or after, with the exception of ensuring that
6 the NGPS, the Nitrogen Purge System tanks, are
7 refilled after 72 hours. They're only sized to last
8 for 72 hours.

9 So, if power is not restored in order to
10 provide the hydrogen mitigation function, then those
11 tanks would need to be recharged with compressed
12 nitrogen.

13 MEMBER BROWN: Okay, but that's consistent
14 with the three-day requirements for getting some
15 offsite assistance to do that anyway. Right?

16 MS. KOLB: Correct.

17 MEMBER BROWN: Okay. I didn't think that
18 was an inconsistent consideration. All right, thank
19 you.

20 CHAIR BALLINGER: Are we through with
21 chapter eight?

22 MR. BARTELME: This is the last
23 recommendation.

24 CHAIR BALLINGER: Ah.

25 MEMBER BROWN: If they're going to do

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1 something. Thank you.

2 CHAIR BALLINGER: Next chapter.

3 MEMBER DIMITRIJEVIC: I want to ask one
4 question, which was on my list and we said the first
5 time. The recovery in the three minutes is not really
6 safety concern means that thing is going to be dumped
7 anyway in the three minutes.

8 So, one of my questions was, can operator
9 bypass opening dump valves? Let's say that he's
10 working on recovering power back and he has to do
11 duction and he's right there, but he wants to prevent
12 dumping. Does he have the power to bypass those
13 valves?

14 MS. KOLB: No.

15 MEMBER DIMITRIJEVIC: No? So, he cannot
16 do anything about if the flow or the cooling system is
17 not restored, that's it. The things are going to
18 dump.

19 MS. KOLB: After 180 seconds, if the flow
20 or the temperature is not restored, there will be a IU
21 cell (phonetic) safety actuation, and the target
22 solution will dump.

23 The procedures that we are drafting will
24 reflect that configuration and those requirements as
25 well.

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1 MEMBER DIMITRIJEVIC: Okay. Because I
2 thinking that he can make an operator error in trying
3 to preserve the solution in -- all right, so you said
4 it's not possible for him physically to bypass
5 dumping.

6 MS. KOLB: So, if we're going to talk
7 about what's physically possible, I mean, within
8 180 seconds, it's very unlikely. But, I mean, it is
9 physically possible to bypass things, but that would
10 be well outside of all the training and the procedures
11 and their license.

12 So, physically possible in the INC system,
13 sure. But that would need to be a concerted effort,
14 against all of their training and their requirements
15 and their license.

16 MEMBER DIMITRIJEVIC: But we know what
17 happens occasionally. He can shut high-pressure
18 (audio interference) decide. So, I mean --

19 (Simultaneous speaking.)

20 DR. BLEY: When you say physically
21 possible, can you do it with switches?

22 (Simultaneous speaking.)

23 MS. KOLB: So, in the TRPS system there
24 are the other service and the bypass switches. So,
25 you would need to know which cards that all these

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1 inputs that are affected feed into, put them to
2 bypass, and then take them out of service.

3 And then, go into the fix system, the non-
4 safety system, and reset the timing and the actuation.
5 So, I don't know whether it's physically possible to
6 do that in 180 seconds. But it is theoretically
7 possible, I suppose.

8 DR. BLEY: Sounds pretty darn hard to do.
9 And most of what you say about the training resonates,
10 except if you study lots of events out in the real
11 world, you find somebody gets clever one day and it
12 just makes sense to them, and they do things you
13 really don't expect them to do from their training.

14 MS. KOLB: Understand.

15 MEMBER DIMITRIJEVIC: But we have a
16 deficient training then. I mean, could be both. So,
17 the procedures, planning, and everything connected
18 with this, will be sort of important from.

19 CHAIR BALLINGER: Okay, so I'm assuming
20 that we're about to make a transition to another
21 chapter. We have been at this for an hour-and-a-half.
22 I'd like to take a ten-minute break before we pick up.
23 Is that agreeable to people?

24 So, we will take a ten-minute break. By
25 my atomic clock over here, we come back at 2:47.

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1 Thank you.

2 (Whereupon, the above-entitled matter
3 went off the record at 2:38 p.m. and
4 resumed at 2:50 p.m.)

5 CHAIR BALLINGER: Okay, it's 2:50, we're
6 back in session. I assume that we're going to be
7 dealing with chapter four based on what I can sort of
8 see on the screen. I can't read any of it, but I'm
9 assuming that the SHINE folks will tell us what all
10 these numbers are, because none of us can read it.
11 Except for Dave Petti, who is standing right next to
12 it.

13 MEMBER REMPE: So, this is Joy, and since
14 you're showing this in the open session, instead of
15 out on the Box, could you send it to Chris, and he can
16 forward it to all of the members, and we can all have
17 our own copy?

18 MR. BARTELME: This copy was placed on --
19 this redacted version was placed on Box this morning.

20 MEMBER REMPE: But we are not allowed to
21 take things from the Box, and have it on our NRC
22 computer, or our personal computer since this is open,
23 and so could you have this, and take it off of the
24 Box, and send it to Chris so we can have our own
25 version?

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1 MEMBER MARCH-LEUBA: Yeah, this is posted
2 by procedure, if it's shown in an open meeting, it's
3 part of the transcript, so it is already public.

4 MEMBER REMPE: It is, but I can't take
5 notes on it right now Jose, I mean it would be nice if
6 you could send a copy to Chris, and let him send it to
7 us.

8 MR. BARTELME: Yes, we can do that.

9 MR. BALAZIK: This is Mike Balazik for NRC
10 staff, Jeff I'll take care of this, I'll send it over
11 right now to Chris via email.

12 MR. BARTELME: Thanks Mike.

13 MEMBER REMPE: Great, thank you.

14 CHAIR BALLINGER: Okay, let's go.

15 MR. BARTELME: So, we made a request to
16 move forward to the discussion of the timing tables.
17 We put this timing table together, and made it
18 available to the members last week. Tracy can kind of
19 lead the discussion on what we've put together, and
20 made available here.

21 MS. RADEL: So, going through these, it's
22 laid out for each of the variables within TRPS, and
23 SFAS, what time was accounted for with respect to the
24 instrument response time, the logic solver, details on
25 any delay if applicable. And then the final element

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1 is referring to say a valve, or a damper, or an
2 isolation, how long it takes for those physical
3 components to reach their fully closed position.

4 Or open, depending on what the item may
5 be. And then there's another column there with the
6 time used in either a safety basis calculation, or the
7 accident analysis. So, depending on which item we're
8 looking at, it may be a thermal hydraulics
9 calculation, it may be an accidental dose calculation.
10 So, we did get a couple of comments, and I was going
11 to touch on those, and then open up to any other
12 questions, or things you wanted me to walk through in
13 particular.

14 So, one of the questions was related to
15 the ten second timing on the PCLS temperature seeming
16 to be overly conservative as far as response time for
17 an RTD. So, that was chosen based on the initial
18 design was to use thermal wells for the temperature
19 instrumentation, and we did an actual timing study on
20 the amount of time it would take to recognize
21 temperature changes based on heat transfer through the
22 thermal wells.

23 We, in the end, decided to place the RTD
24 directly in the process stream, so we no longer have
25 thermal wells there. So, that timing is conservative,

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1 we would expect a much faster response time than that
2 with the instrumentation direct in the process stream
3 at this point, but the ten seconds was originally
4 chosen with thermal wells in mind.

5 MEMBER MARCH-LEUBA: So, this is Jose, we
6 do not have thermal wells.

7 MS. RADEL: In the PCLS, as well as the
8 TSV off gas system, that is correct, there are not
9 thermal wells there. So, there are thermal wells
10 within -- for the non-safety related RTDs within the
11 target solution vessel.

12 MEMBER MARCH-LEUBA: Yeah, this is a low
13 pressure system, it's not like in operating plants.
14 In operating plants those thermal wells can have as
15 much as 60 second time delays, but this is for a very
16 high pressure, thick wall. So, yeah, and you are
17 direct contact so ten seconds is more than
18 conservative. Okay, thank you.

19 MS. RADEL: And the second question was
20 related to the radiation monitor timing of 15 seconds
21 seeming conservative, and we do agree that we would
22 expect it to recognize the condition prior to the 15
23 seconds, but I wanted to go with the conservative
24 number, as well as allow for additional time for
25 averaging, and giving better statistics on the number.

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1 That kind of additional longer duration
2 averaging time has not been used in our uncertainty
3 calculation at this point, but is something that was
4 considered that we would be able to measure more
5 accurately if we have a little more averaging time.

6 MEMBER MARCH-LEUBA: This is again Jose.
7 You are speculating a total count measurement, not an
8 energy spectrum definition to identify a single energy
9 peak, correct? The total --

10 MS. RADEL: Correct, it's count based,
11 yeah.

12 MEMBER MARCH-LEUBA: 15 seconds, you'll
13 get extremely good statistics no matter where you put
14 it. Okay, so it's just conservatism, my concern was
15 that you were -- maybe we were trying to do an energy
16 spectrum to identify a particular isotope on an energy
17 peak, and then 15 seconds may not be sufficient. But
18 if you're doing total counts, 15 seconds is more than
19 enough. Okay, thank you.

20 MS. RADEL: Yeah. Okay, and another
21 question we received was looking for clarification on
22 the timing around the dump valves, and the flux
23 detection, and the total timing of three seconds
24 there. So, the safety analysis use the three seconds,
25 that three seconds is to account for the 450

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1 milliseconds of instrument response time, the 500
2 milliseconds for the TRPS system, and then the two
3 seconds for the valve to fully open.

4 So, in the discussion that was noted here,
5 the SR notes within one second, the dump valves will
6 begin to open. That one second is that instrument
7 response time, and logic solver time, so that was not
8 referring to something inherent to the valve, but in
9 the time prior to the valve being told to open, or to
10 start opening. So, that one second it's referring to
11 is the instrument response time, plus the logic solver
12 time.

13 And then to go from starting to open to
14 fully open is a two second duration for the valves, is
15 what was allotted to those valves, they actually open
16 quicker than that, but the total time line is three
17 seconds. So, any further questions on that one?

18 MEMBER MARCH-LEUBA: Not on that one, but
19 on a separate one. Are you done with your
20 presentation? It's one I don't think I have told you
21 in advance.

22 MS. RADEL: Yes, so I think I covered all
23 of the times that were sent, specific questions in
24 advance, so I open it up to you.

25 MEMBER MARCH-LEUBA: Let me ask you one

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1 that catches you a little on surprise. The power
2 range flux average time of 45 seconds, that's the
3 third row, are we ever achieving the neutron flux that
4 takes over 45 seconds, because you expect the neutron
5 driver to be very noisy, like you could have tritium
6 pressure oscillations that will give you a ten
7 millisecond spike.

8 And before you answer, let me say where
9 I'm coming from. Normally with licensed reactors, to
10 the peak hour, even if it's only for ten milliseconds,
11 and here we appear to be licensing the facility for
12 the 45 second average power, and I don't see in my
13 mind any problem with that, because as I always say,
14 the fuel is already molten, it's already a liquid,
15 there's nothing you can do to this fuel that will
16 damage it.

17 But is this what we're doing, the license
18 is for a maximum power of 100 and change kilowatts on
19 average of 45 seconds? Go ahead.

20 MS. RADEL: Yes, so the averaging time is
21 to account for variation in the neutron driver. So,
22 as it's operating it is expected to in the systems
23 that we are running now, and testing now do perform
24 very stably as they're operating within a few percent
25 of where they're at. But they do have -- it can have

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1 these drop out moments that are very quick, less than
2 a second drop outs where it drops out, and comes back
3 in.

4 And that doesn't inherently affect the
5 system, either the solution, or the operation, but
6 could cause a slight spike in power due to some of the
7 void escaping during those very short drop outs. And
8 so that time averaging allows us to not trick off on
9 small driver dropouts.

10 MEMBER MARCH-LEUBA: Yes, so this, I'll
11 need to remember, because it's not currently in my
12 memo, to add a sentence to this, that it is -- there
13 is an echo -- there is a deviation from standard
14 practice. Whereas in operating reactors we license
15 for peak power, SHINE is licensed to the 45 second
16 average power. And because of the special nature of
17 the solution, where you cannot damage the fuel, that's
18 perfectly okay.

19 You worry about heat removal, not that --
20 there is no SAFDL with specified acceptable fuel
21 limits because the fuel is already molten. So,
22 probably the staff should recognize light radiation in
23 this, it is different than what we're used to do.

24 MEMBER KIRCHNER: Jose, this is Walt, I
25 looked at that, and I thought that was a typo. I

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1 thought it meant to be 4.5 seconds. Let me ask a
2 question, at the power range, I mean this is a trip
3 signal on high power, or is this the low power range
4 limit. Is this startup instrumentation, or is this
5 full power operation instrumentation?

6 MS. RADEL: This is full power operation,
7 so in addition to the time average trip, we also have
8 a high live range neutron flux trip that is not
9 averaged, so --

10 MEMBER KIRCHNER: Okay, you should add
11 that to the note then, because the 45 seconds as Jose
12 was indicating, normally wouldn't be acceptable. I
13 mean you could do some serious damage in 45 seconds,
14 notwithstanding that the fuel is already in a molten,
15 or liquid configuration. I mean an overpower transit
16 could lead to boiling, and pressurization of the
17 system.

18 So, you've got, in addition to this, you
19 have a high flux trip --

20 MS. RADEL: Correct, and they work in
21 conjunction with each other. So, the wide range
22 neutron flux trip, and the time averaging on the power
23 range neutron flux trip both are used within the
24 safety basis thermal hydraulics calculation to
25 demonstrate that no matter what the scenario in that

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1 45 seconds -- that those two trips in combination
2 protect the system.

3 MEMBER KIRCHNER: Great, okay, thank you
4 very much.

5 MEMBER MARCH-LEUBA: But isn't the wide
6 range of flux, let's call it a little inaccurate? I
7 mean that's why we use power range, because it's more
8 accurate. I assume that if you have a 20 percent
9 peak, wide range would see it.

10 MS. RADEL: So, the uncertainty on it is
11 fairly small, it's listed in table 7.4-1, I can pull
12 it up to confirm whether it's the one, or two percent.
13 But it's a small difference there.

14 MEMBER MARCH-LEUBA: Over the full range,
15 a couple of percent?

16 MS. RADEL: Yes, and that's listed in
17 table 7.4-1.

18 MEMBER MARCH-LEUBA: Okay, just the 45
19 seconds looks a little long, but given the special
20 circumstances, and characteristics of this reactor, in
21 my mind it's acceptable. Okay, thank you.

22 MEMBER REMPE: So, this is Joy, and I
23 appreciate you going through, and generating this
24 table, and explaining what some of the items are
25 today, like final element that I was puzzled about.

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1 The other thing I was puzzled about, and that's why I
2 really appreciate you doing this table, is that I know
3 when we discussed this before, often you'd say it's in
4 whatever section of the FSAR.

5 But even in this table you are citing
6 subsections of the FSAR, and providing numbers that I
7 don't see in the FSAR, is that true?

8 MS. RADEL: So, just to reiterate from our
9 previous discussion, for some of these, the timing is
10 not explicitly stated within the FSAR. The FSAR
11 contains a summary of the analysis that was performed,
12 and not all numbers in that analysis are explicitly
13 stated, but that cross references to where the
14 description of the analysis in which the timing was
15 used is listed there. And so you may not see every
16 single number explicitly stated within the FSAR.

17 MEMBER REMPE: And that's what motivated
18 this question, and the request for this table, because
19 it was not clear if enough time was there for
20 subsequent systems to take actions in a timely
21 fashion. So, I guess I'm curious how the staff, so
22 maybe this is a question for the staff rather than
23 SHINE had competence that things were appropriately
24 accounted for without this table, because you guys
25 weren't so concerned about it as us, right?

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1 MR. BORROMEIO: So, this is Josh Borromeo,
2 we took a deep dive at this in chapter seven, and
3 that's where we were trying to figure out where each
4 of these things were cross referenced. We did a
5 vertical, and horizontal slice of these timings
6 through audits, and so we verified these times, and
7 their various calculations in audit space, that's
8 primarily where we got our confidence to move forward
9 --

10 MEMBER REMPE: And is that audit
11 documented in a report so that we could also kind of
12 see it?

13 MR. BORROMEIO: So, that audit report,
14 we're generating that now, it's not completed yet, but
15 we can certainly -- there are calculations where we
16 took a look at some of these items, where we sampled
17 these that we could potentially point you to, to take
18 a look at what we --

19 MEMBER REMPE: That would be helpful.
20 Again, I guess I'm thinking about with all the wave of
21 new applications coming, and the importance of
22 instrumentation, and timing, and especially if
23 operators are going to be less important, and systems
24 are going to rely more on passive features, or
25 whatever, it would be good to make sure everybody's

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1 thinking about the instrumentation, and there's enough
2 time there to get things done.

3 So, yeah I appreciate seeing the audit,
4 and that's why I'm really glad we went through this
5 exercise.

6 MR. BORROMEO: Understood.

7 CHAIR BALLINGER: Okay, should we move on?
8 Whatever that means. Are we through with this?

9 MEMBER REMPE: Yeah, I guess I just wanted
10 to also emphasize something we talked about during the
11 break, that this plus that stainless steel 347
12 question, which you said has been addressed are the
13 only two items I had left on chapter four, because we
14 took care of them in other chapter discussions.

15 CHAIR BALLINGER: So, I think as far as
16 we're concerned, we're okay right? So, can we switch
17 to the next chapter? Are we going in order with the
18 agenda, or are we switching back, and forth?

19 MR. BALAZIK: Professor, this is Mike
20 Balazik again, NRC staff, I think we should just
21 continue in order, touch upon chapter nine, auxiliary
22 systems.

23 CHAIR BALLINGER: Okay, good, thanks.

24 MEMBER MARCH-LEUBA: This is Jose, can we
25 stay on chapter 13, I have one clarification question,

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1 high level.

2 CHAIR BALLINGER: We're going to get to
3 chapter 13.

4 MEMBER MARCH-LEUBA: Yeah, we are in
5 chapter 13 now.

6 MEMBER REMPE: No, we're in chapter four
7 Jose.

8 CHAIR BALLINGER: Yeah, we're in chapter
9 four.

10 MEMBER REMPE: It's confusing because they
11 interact. By the way too, I still would like to see
12 the audit report from the staff Ron, as an action
13 item, just to follow through, and cross my T's, and
14 dot my I's.

15 CHAIR BALLINGER: Chris isn't here.

16 MEMBER REMPE: That's why I'm mentioning
17 it on the record here, but I think that the staff will
18 know, and take care of it.

19 CHAIR BALLINGER: All right, Chris is
20 there now. Okay, so onto chapter nine?

21 MR. BALAZIK: Yeah, this is Mike Balazik,
22 NRC staff. Chapter nine, there was a concern related
23 to the nitrogen purge systems, and the numbers that
24 SHINE has used in tech specs of 2100 pounds, and a
25 certain number of tubes before all the TSVs need to be

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1 dumped, and there was a comment about deeming margin
2 on that tech spec to avoid unnecessary facility
3 shutdowns. Jeff, you guys are going to address this
4 one?

5 MR. BARTELME: Yeah, Catherine can speak
6 to that one.

7 MR. BALAZIK: Yeah.

8 MS. KOLB: Yes, this is Catherine Kolb.
9 So, yeah the comment was about the margin that we had.
10 So, the calculations that we have done require the
11 numbers that we have put into the technical
12 specifications, the 2100 pounds, and 11 out of the 12
13 provided tubes. I mean there is an opportunity for us
14 to recover some operational immersion there with the
15 relief valve on these tubes set, and they are rated
16 for 2800 pounds.

17 So, we can keep them filled higher than
18 the minimum number in the tech specs for some
19 additional margin. But that is the calculation that
20 we have right now in order to assure that we can
21 successfully deliver the minimum required flow for the
22 72 hours that we've put in the tech specs. So, while
23 we acknowledge your concern on our operational
24 philosophy there, we do have some margin, not infinite
25 margin, that is where we are.

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1 MEMBER SUNSERI: It's not a big concern,
2 it was just a comment based on practical experience,
3 it's just meant for your use, and information only,
4 it's really not a major concern for us. And that's
5 Matt Sunseri speaking.

6 CHAIR BALLINGER: That does it for chapter
7 nine.

8 MR. BALAZIK: Okay, this is Mike Balazik,
9 NRC staff, I'll continue on with chapter 11. There
10 was a concern, or observation related to addressing
11 strategies to avoid complacency, maintaining a
12 questioning attitude, and ensuring that reactor
13 protection staff are comfortable raising safety
14 issues, not only with the SHINE organization, but
15 directly with the NRC staff.

16 I will say that in chapter 12, conduct of
17 operations, within NUREG 15.37, safety culture isn't
18 addressed. That's usually something that the staff
19 addresses in inspection space. We have two
20 inspections that we do for safety culture to evaluate
21 a licensee's independent safety culture assessment.
22 I'll also say that there are numerous ways that SHINE
23 staff can report a safety concern directly to the NRC,
24 like when there's an inspector out there.

25 Also there's the NRC form three, which

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1 provides guidance to all employees where they can send
2 safety concerns to. So, I mean again, we don't plan
3 on addressing anything related to safety culture in
4 chapter 11, just because there is no guidance in the
5 NUREGs that talks about that. And I know that SHINE
6 doesn't have any information related to safety culture
7 in the FSAR. I don't know if there's anything
8 additional that SHINE wants to add to the
9 conversation.

10 MR. BARTELME: SHINE, we do have a safety
11 culture program, an effort to foster a strong safety
12 conscious work environment. We do frequently remind,
13 communicate with all SHINE employees, we do have the
14 multiple avenues to raise concerns, to raise safety
15 issues either via our corrective action program,
16 immediately to an individual supervisor.

17 And we do communicate that we also have --
18 we do post form three, and to make it clear to SHINE
19 staff that they can go communicate directly, or raise
20 an issue directly with the NRC, and that directions
21 are on those posted form threes.

22 MEMBER BIER: Thank you, this is Vicki
23 Bier, I think that was in response to comments, or
24 questions that I had raised earlier, so I appreciate
25 it. I am not a regulatory person, so didn't know what

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1 to expect under conduct of operations. The answer I
2 think makes sense to me, that it's not something that
3 belongs there. The one thing that I did want to
4 mention while we're on the topic, I once heard a talk
5 from I think a National Lab director, or whatever.

6 Who said that basically achieving safety
7 required being schizophrenic, because you spend every
8 morning telling every external stakeholder that things
9 are okay, right? The press, the legislature, your
10 local officials, et cetera, don't worry, we know
11 exactly what we're doing, this is a well understood
12 technology, everything is under control, we have a lot
13 of expertise.

14 And every afternoon telling your staff you
15 can never be too careful, don't get too complacent,
16 something could go wrong at any moment. So, that
17 underscores the importance of the issue, but I can
18 completely accept that that's probably not something
19 that belongs in the FSAR chapter.

20 MEMBER HALNON: This is Greg Halnon, Mike
21 you mentioned the inspections, is this the end of the
22 reactor oversight process, or is this under some other
23 inspection regime? Because the only safety culture
24 stuff's in the oversight process.

25 MR. BALAZIK: No, this is Mike Balazik,

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1 NRC staff. It is not going to be under the ROP, but
2 we have used those inspection procedures, it's 95003,
3 and there's another inspection procedure, 4100. And
4 while we have used these, I'll say recently, to look
5 at a licensee's third party assessment for safety
6 culture. For example, the NIST event, we've
7 incorporated it there.

8 And there was another licensee where we
9 did an assessment of that safety culture -- I'm sorry,
10 an evaluation of their third party safety culture
11 assessment. But no, it's not going to be under the
12 ROP. The research, and test reactors aren't under the
13 ROP, but we can apply those inspection procedures to
14 them.

15 MEMBER HALNON: Thank you.

16 CHAIR BALLINGER: This is Ron, seemingly
17 off topic, you want to know what happens when you
18 don't have a good safety culture, there's an article
19 in Aviation Week, which I will send out if anybody
20 wants it, where it describes what happened with the
21 Boeing 737 issues, and the crashes, and things like
22 that. It's a very informative article. I think I
23 sent a copy to Dennis, who might want to make a
24 comment. But if anybody wants it, I'm happy to
25 provide with this article. It's what happens when you

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1 blow it basically.

2 MEMBER KIRCHNER: Just send it out to
3 everyone Ron, thank you.

4 DR. SCHULTZ: Mike, This is Steve Schultz.
5 You mentioned the inspections that could be done, what
6 kind of frequency would that be on?

7 MR. BALAZIK: Well, for the specific for
8 safety culture, if we were to request SHINE perform a
9 third party assessment, that's when we would do that
10 particular inspection on safety culture. Is this more
11 of a general ask of, I'll say the generic safety
12 inspections when we're performing those, or is it
13 related strictly to safety culture?

14 DR. SCHULTZ: It was related to safety
15 culture particularly.

16 MR. BALAZIK: Yeah, so we would do those
17 if we were to request SHINE do a third party safety
18 culture assessment, that's when we would do those.
19 So, it's not that we do it every year, every two
20 years, it's when we request them to do the third party
21 assessment.

22 DR. SCHULTZ: But when you do your
23 inspections, I mean you look at the corrective action
24 program, an inspector would identify the need for
25 safety culture improvements in a standard inspection

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1 that might be done?

2 MR. BALAZIK: Correct, and to identify any
3 deficiencies with those corrective actions related to
4 the assessment.

5 DR. SCHULTZ: And that might lead you to
6 look into safety culture if you had something more
7 than a minor finding in an inspection.

8 MR. BALAZIK: Definitely, yes sir.

9 DR. SCHULTZ: Thank you.

10 MEMBER SUNSERI: This is Matt, and just
11 looking at the most recent construction inspection,
12 there are elements of the quality assurance program,
13 and corrective action program that were specifically
14 looked at, and those are all elements of safety
15 culture if you want to call it that. So, it is
16 happening, and there is evidence that you're looking
17 at, so that's good.

18 DR. SCHULTZ: Matt, this is Steve again,
19 that's what I was referring. I saw that in the
20 inspection that had been done, and I saw the
21 corrective actions that were developed as a response
22 to the inspection, and I had a question for SHINE
23 there. There were eight corrective actions that were
24 generated as a result of the May inspection, could you
25 give me a quick brief as to what the status of the

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1 progress is on correcting those elements that were
2 identified?

3 MR. BARTELME: This is Jeff Bartelme from
4 SHINE, I'd have to pull those, and look for an updated
5 status on the IMRs initiated during the inspection, I
6 don't have it at the ready.

7 DR. SCHULTZ: Could you give us an update?
8 It could be in July, but I think they're probably all
9 done, but I'd like to know, I would appreciate that.

10 MR. BARTELME: Sure, I can certainly do
11 that.

12 MEMBER REMPE: This is Joy, and I need to
13 step back for a second about this table for timing.
14 You showed it in the public session, it has
15 information redacted, but yet the top header of the
16 sheet says proprietary information, so it has
17 incorrect markings, what is it? Proprietary, or open?

18 MR. BARTELME: This is Jeff Bartelme, the
19 version that was shared, there were a couple numbers
20 in there that are proprietary. We did redact those so
21 that the header was changed from withhold to withheld,
22 just to make clear that --

23 MEMBER REMPE: Okay, so it is public?

24 MR. BALAZIK: Yes, this is Mike Balazik,
25 NRC staff, this is how SHINE has done the entire

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1 public FSAR, where they want to identify those pages
2 where proprietary information was withheld from the
3 public.

4 MEMBER REMPE: Thank you, I missed the
5 withheld, I thought it said withhold, or something,
6 thank you.

7 MR. BALAZIK: Yeah.

8 CHAIR BALLINGER: Are we through with this
9 part? Hopefully. That leaves 12.7, 12.13, and 13, so
10 can we do 12.7?

11 MR. BALAZIK: Yeah, this is Mike Balazik
12 NRC -- go ahead Catherine.

13 MS. KOLB: Sorry, we were just going to
14 address 12.7 here briefly if that's what you were
15 intending.

16 MR. BALAZIK: Yes.

17 MS. KOLB: Got it. So, this is Catherine
18 Kolb, we appreciate the comments that we received last
19 time, and we are intending to implement items three,
20 and four about the clarifying tasks, and the EPZ
21 boundary in the next revision of the EQUIN (phonetic)
22 and then we have issued an item in our corrective
23 action program to track the disposition of the other
24 comments that were identified for future revisions,
25 and, or implementing procedures?

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1 MEMBER HALNON: Yeah, this is Greg, thanks
2 for taking care of that.

3 MR. BALAZIK: Yeah, this is Mike Balazik,
4 NRC staff, continue on, there was an item in chapter
5 12.13, which is MC&A related to certain limits that
6 were used. Jeff, SHINE's going to address these?

7 MS. RADEL: Yes, this is Tracy, I'll speak
8 to these. So, we do share the concern of the .125
9 percent being a challenge to achieve given the type of
10 facility that we have. We are performing an SCID
11 tabletop exercise right now to determine if that .125
12 is achievable, or if an exemption would need to be
13 sought for that.

14 CHAIR BALLINGER: Yeah, that was not a
15 safety issue, we just thought that it was not
16 achievable.

17 MEMBER PETTI: I think the issue for the
18 staff is could they come in, and say they want to use
19 the 4.5 kilogram that they discussed.

20 MEMBER MARCH-LEUBA: Can you turn the mic
21 up?

22 MEMBER PETTI: The question for the staff
23 is whether they can use the 4.5 kilograms that they
24 discussed in the NUREG.

25 CHAIR BALLINGER: They're basically trying

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1 to shoehorn something into the NUREG which has nothing
2 to do with --

3 MEMBER PETTI: That doesn't necessarily
4 fit with the staff looking at that.

5 MR. BALAZIK: This is Mike Balazik, NRC
6 staff, Glenn, do you have any thoughts on that?

7 MR. TUTTLE: Yeah, this is Glenn Tuttle
8 with Office of Nuclear Material Safety and Safeguards,
9 the MC&A reviewer. The only comment I had, they're
10 doing the right thing by doing their tabletop. The
11 4.5 kgs that is referenced in NUREG 10.65, the 10.65
12 is for the category three facilities. And for
13 category three facilities, 4.5 kilograms is part of
14 the rule. So, they have the greater of 4.5 kgs, or
15 .125 percent of active inventory for the category
16 three facilities.

17 For the category two facility, we don't
18 give them that 4500 kgs limit. So, it's strictly .125
19 percent. So, what SHINE is doing is right. They've
20 got to figure out can they get near it, or not, and
21 they'll be doing that in the tabletop.

22 MEMBER PETTI: So, they're a category two
23 facility?

24 MR. TUTTLE: That's right.

25 MEMBER PETTI: Okay, thank you.

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1 CHAIR BALLINGER: Okay, so chapter 13?

2 MEMBER BROWN: 12.7 still.

3 CHAIR BALLINGER: Okay, 12.7, we're on --
4 okay.

5 MEMBER BROWN: That's what you just
6 finished wasn't it?

7 CHAIR BALLINGER: No, one three, 13.

8 MEMBER BROWN: Did we finish 12.7?

9 CHAIR BALLINGER: Right.

10 MEMBER BROWN: Boy, that one whizzed right
11 by me, yeah, I want to go back. This is just a head's
12 up. Number two under 12.7 says there is no mention
13 who oversees cyber security, or how cyber is
14 considered in the planned physical security is clear,
15 that the security department has the accountability,
16 however cyber security sometimes covered by
17 engineering, which is a corporate function, not
18 exactly.

19 Adding this description would be helpful.
20 I'm just giving you a head's up that when we do
21 chapter seven, none of the plant controls, the TRPS,
22 the NFDS, the other plant control, and monitoring
23 systems, you cannot incorporate cyber security
24 software into those systems, and make sure they
25 operate properly, because they cannot be continuously

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1 updated.

2 They will be slowed down, might even not
3 respond. So, there will be a considerable questions
4 asked relative to how we ensure control of access is
5 exterminated relative to its ability to get into any
6 of those systems. That's based on the control of
7 access thought process, and the digital data
8 communications out of those systems to other systems,
9 or outside the plant.

10 Just giving you a head's up that we will
11 be discussing that in spades relative to the chapter
12 seven meeting in July. July the 20th, or something
13 like that.

14 MR. BALAZIK: This is Mike Balazik, NRC
15 staff, I know that we'll be discussing chapter seven
16 July 19th, and 20th, but the cyber security piece of
17 that is going to be in September. Understand that you
18 can ask questions that we can resolve at a later date
19 on that September when we discuss cyber security.

20 MEMBER BROWN: Okay, well cyber security
21 does not apply to the TRPS system, it's a control of
22 access issue, so I'm making sure you understand the
23 differentiation. You can't just build cabinets that
24 have fiber optic cables hanging out of them with no
25 communication device, and waiting for somebody to do

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1 something later. We've been through this drill
2 before, and just wanted to make sure that subject,
3 they are separate subjects.

4 Control of access to those systems is
5 different than cyber security to all the other
6 numerous systems that you have within the plant.

7 MR. BALAZIK: Understand, thank you.

8 MEMBER BROWN: Okay, thank you Ron, I'm
9 done.

10 CHAIR BALLINGER: Okay, we're up to
11 chapter 13, and by my agenda, we also have a closed
12 session that's related to chapter 13. So, I guess my
13 question to everybody is, and the staff, and SHINE, is
14 do we need the closed session on chapter 13?

15 MR. BALAZIK: This is Mike Balazik, NRC
16 staff, and SHINE can chime in also, the only need for
17 the closed session was to discuss those proprietary
18 numbers, or any other proprietary information. So, I
19 mean are ACRS members looking for further discussion
20 on those two proprietary numbers?

21 CHAIR BALLINGER: My guess is Jose
22 probably has something to say here.

23 MEMBER MARCH-LEUBA: My question was not
24 proprietary. What proprietary numbers are you talking
25 about?

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1 MR. BALAZIK: They're identified in the
2 table. They were blanked out.

3 MEMBER MARCH-LEUBA: The chapter four
4 quote unquote table?

5 MR. BALAZIK: Yes, the timing table,
6 correct.

7 MEMBER MARCH-LEUBA: Yeah, I'm not
8 interested on those blacked out numbers.

9 MR. BALAZIK: Those are driver dropout
10 numbers.

11 MEMBER MARCH-LEUBA: Yes, I know.

12 CHAIR BALLINGER: What I'm trying to get
13 at is should we just proceed now, and complete
14 everything, and then that would finish us up, or
15 should we plan on a closed session?

16 MEMBER MARCH-LEUBA: Let's leave that
17 decision to the end of the discussion, and if
18 something pops up, we close the session.

19 CHAIR BALLINGER: All right, so let's go
20 with 13.

21 MEMBER MARCH-LEUBA: Okay, so since you
22 brought up the driver dropout, that is exclusively
23 (audio interference) enhancement function, has
24 nothing to do with reactor protection, is that
25 correct?

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1 MS. RADEL: Sorry, can you restate the
2 question?

3 MEMBER MARCH-LEUBA: The driver dropout
4 delay, which is a proprietary number, but that is an
5 exclusively an operational concern to improve
6 reliability, and has nothing to do with reactor
7 protection functions?

8 MS. RADEL: So, this is Tracy. Allowing
9 for a driver dropout is for operability reasons. The
10 duration that the driver is allowed to dropout is a
11 safety aspect, so the reason for that is that after
12 the driver drops out within a short period of time,
13 the void is expected to leave the solution. After
14 that, because the PCLS is still running, the target
15 solution will cool, which also is going to add
16 reactivity to the system.

17 And if the driver were to come back on
18 after a certain period of time, the system would risk
19 hitting that limit. So, we do
20 have that duration, which is proprietary, that
21 protects the system from hitting the power density
22 limit.

23 MEMBER MARCH-LEUBA: The delay does not
24 prevent this accident, if you were to restart so many
25 seconds later, you would be even colder, and with less

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1 of it, and that's one of the accidents that is
2 analyzed. And it's shown that a trip would occur if
3 that happens.

4 MS. RADEL: Yes, the trip will occur, we
5 still would not want to hit the

6 limit, even if we trip the unit. We don't want
7 to reach that power density, even if it's for a short
8 duration. So, the flex trip isn't fast enough to stop
9 that really fast spike that comes in as the driver
10 comes back in, and so we only allow it to drop out for
11 that certain period of time.

12 Because after that, you would have built
13 in enough reactivity through the cooling of the target
14 solution that that peak could potentially reach the
15 power density limit.

16 MEMBER MARCH-LEUBA: So, let me see, what
17 you're trying to prevent is for the driver to come
18 back on its own at full power, what you want is to
19 have what they call a civilized restart, a ramp up?

20 MS. RADEL: Correct.

21 MEMBER MARCH-LEUBA: Yeah, so we're trying
22 to prevent this spurious recovery, and you will only
23 have an operator driven restart, which will be as a
24 ramp up?

25 MS. RADEL: Yeah, correct.

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1 MEMBER KIRCHNER: So, Tracy, this s Walt
2 Kirchner, isn't this interlocked? I mean once it
3 drops out to prevent his restart, is there some kind
4 of interlock that once it drops out, the operator has
5 to manually override something to restart it?

6 MS. RADEL: After the driver dropout
7 duration passes, the breakers open, the breakers are
8 opened by the safety system after that delay, which is
9 proprietary.

10 MEMBER KIRCHNER: Well, yeah, but just
11 sticking on the safety part, not the numbers, which I
12 find odd. You get to -- what I'm having trouble with
13 is the concept of operations from the safety
14 standpoint. You would actually let the system go back
15 online by itself?

16 MS. RADEL: Yes. So, the system is able
17 to auto recover, and that's necessary because there
18 are very short dropouts that occur with this type of
19 accelerator system. So, it will see a momentary drop
20 of beam, and come back on in much less than a second,
21 that kind of drops out, and comes back on. So, we
22 have those dropouts. There are times where it'll
23 dropout for a few seconds as well, depending on what
24 it's recovering from.

25 The duration that we determined here is

1 more driven from the safety side of it, of how long
2 can we allow it to drop out before we would not want
3 it to come back on for that power density reason.

4 MEMBER KIRCHNER: Yeah, but that seems
5 like a much longer delay period than the intermittent
6 operation of the accelerator.

7 MS. RADEL: It is.

8 MEMBER KIRCHNER: It seems to me that you
9 can average out the intermittence of the accelerator
10 performance, but when you come to an actual it's out,
11 and now the system as you described is cooling down,
12 the void's collapsed, you're adding reactivity, it
13 would seem to me that system shouldn't be able to turn
14 itself back on automatically.

15 MS. RADEL: Yes. So, the duration is
16 longer than what we would expect in those auto
17 recovery scenarios, so it's unlikely we'll see many
18 auto recoveries in the time frame between a few
19 seconds, and the limit that we put in place. But the
20 limit was driven by what is a safe duration to allow
21 it to come back on, so we approached it from, for
22 safety reasons, what amount of time can this occur.

23 So, I agree that it's unlikely that we
24 will have many auto recoveries that are past a few
25 seconds, just because if it's out for that long, it's

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1 likely something that will keep it down for a more
2 extended period of time.

3 MEMBER KIRCHNER: Yeah, so that was my
4 point. For that contingency, I would think that the
5 system would be interlocked, and you would have the
6 operator have to intervene to allow a restart. That's
7 an observation, it's not a recommendation.

8 MS. RADEL: Yes, noted.

9 CHAIR BALLINGER: We're on 13.

10 MEMBER MARCH-LEUBA: Okay, back to my
11 question I wanted to give earlier, and this is
12 completely different. The members have discussed on
13 the production of a memo for chapter 13, that the use
14 of the maximum hypothetical accident, MHA, was a good
15 idea, and it was a good idea to supplement it with the
16 SSA, the SHINE safety analysis. We talked among
17 ourselves that maybe other submittals would maybe want
18 to follow the example that SHINE has used.

19 Meaning if it worked for SHINE, it would
20 work for us. But we have some difference of opinion
21 on what you did. So, can you refresh for me how the
22 MHA was identified. Was it based on a thoughtful
23 process, a surge, or what could possibly be the worst
24 thing that you can do, or was it based on running the
25 SSA first, and picking the worst?

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1 MS. RADEL: So, this is Tracy. It was
2 chosen from -- it was chosen to be the worst design
3 basis accident that could occur. In order to find the
4 worst design basis accident that could occur, we did
5 not limit ourselves in any way. Going through the
6 HAZAP FMEA process, identifying all the potential
7 process upsets, and conditions that could occur within
8 the systems.

9 Identifying all of those accident
10 sequences, then we did categorize those according to
11 the categories that are within NUREG 15.37 for any
12 ones that did not fit into those categories, we put
13 those into the facility specific events to make sure
14 they were also captured. We did the radiological dose
15 consequence analysis for bonding scenarios in all
16 accident categories.

17 And then from those results, we determined
18 which scenario was bounding. As noted previously,
19 there is a tritium event that is slightly higher than
20 the fission product based event that was chosen as the
21 MHA, and there was quite a bit of discussion on which
22 of those to choose. We went with the fission product
23 based event there, but did capture the tritium event
24 as well in chapter 13.

25 MEMBER MARCH-LEUBA: So, then the MHA was

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1 chosen based on the results of the hazard analysis,
2 and the SSA?

3 MS. RADEL: Correct.

4 MEMBER MARCH-LEUBA: Okay, thank you. I'm
5 glad you put this on the record, because as we said,
6 we thought that this is likely, at least possible that
7 other submittals would follow your example, so it's
8 good that we all know what you did exactly. Some of
9 us remember it differently, so thank you. And I don't
10 have any more questions for chapter 13. Anybody has
11 more questions, Walt, or Joy, or Vesna?

12 MEMBER KIRCHNER: I don't Jose, thank you
13 for asking.

14 DR. BLEY: This is Dennis, I don't have a
15 chapter 13 exactly question, but it was related to 13.
16 I apologize to Chris, I should have given you a call.
17 It might be my problem with using the Box system, but
18 I've recently gone back in to review the SHINE safety
19 analysis again, the tech report 2020-16 Rev 5, and I
20 find it's still listed in the ACRS file list.

21 But when I go to the review for February
22 16th, I don't find it there anymore. Is it there, or
23 am I just having trouble using Box, or can you put it
24 back there?

25 MR. BARTELME: This is Jeff Bartelme from

1 SHINE, Mike Balazik, and I had identified some files
2 on Box that were no longer there, and Mike can speak
3 to the specifics, but I believe there's some time
4 limit, that they're removed after some time. But we
5 can put any of these X analysis related docs back on
6 the reading room.

7 DR. BLEY: That main SSA document I'd
8 really like you to put back up, because I'm going to
9 go back, and use it some more.

10 MR. BALAZIK: Yeah, this is Mike Balazik,
11 NRC staff, there is a time limit on how long documents
12 stay on Box. I believe it is 90 days, and what I have
13 requested through Box is an extension to 180 days,
14 we'll see if that gets approved, or not. But yes,
15 we'll get the SSA loaded back up to the Box account.

16 DR. BLEY: Thank you very much.

17 CHAIR BALLINGER: Questions from the
18 members, others? So, now I need to ask the question
19 again, do we need a closed session? If we need a
20 closed session, then we'll do public comments now, and
21 then switch to a closed session.

22 MEMBER MARCH-LEUBA: This is Jose, I don't
23 need a closed session.

24 CHAIR BALLINGER: Okay, it sounds like we
25 don't need a closed session. So, what we can do now

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1 is ask if there are members of the public that would
2 like to make a comment. If there are members that
3 would like to make a comment, please state your name,
4 and make your comment. Reminding if you're on the
5 phone, I think you use star six again to unmute
6 yourself. I always wonder about dead silence.

7 But hearing none, then let's ask one more
8 time for members if there are questions that need to
9 be looked at, or consultants, excuse me, I apologize.

10 MEMBER BROWN: You could always ask
11 somebody just speak to make sure the phone line's
12 there, that's what we did in the old days, I don't
13 know what we do now.

14 CHAIR BALLINGER: Tap your hands on the
15 desk, or something. Okay, I haven't heard anything,
16 and it sounds to me like we're done for the meeting
17 today. Hopefully we'll get the transcript quickly,
18 because that's the only record, we have no slides of
19 this, except for the table I guess, but it's available
20 to the members anyway, it's being sent out.

21 MEMBER REMPE: It's already been sent out,
22 I just didn't notice it had switched from withhold to
23 withheld, the fine print, one letter difference.

24 CHAIR BALLINGER: Next week just to give
25 you guys a little bit of a head's up, next week I'm

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1 going to start working hard on assembling the
2 framework of the letter. I've got memos from people,
3 and there's a lot of text that I can use now. So, if
4 you've got comments related to this, at least up to
5 these chapters, now is the time to chime in, and send
6 them to me. Except we will not accept any comments
7 from Charlie.

8 MEMBER BROWN: They're still on the line,
9 right?

10 CHAIR BALLINGER: I think so.

11 MEMBER BROWN: I was making rough notes as
12 we went through chapter eight, and I forgot to write
13 something down in a couple places, and I wanted to
14 make sure if I could, as opposed to reading through
15 the transcript, I would like to ask the question to
16 make sure I knew where I was referencing something.

17 CHAIR BALLINGER: Should we all leave, and
18 leave you here for them?

19 MEMBER BROWN: No, this is short, this is
20 not going to be long. Is SHINE there?

21 MR. BARTELME: Yes, we're still here.

22 MEMBER BROWN: Okay, if you remember back
23 on chapter eight, we were talking about the AC UPSS C,
24 and the ABT configuration, and you commented that it
25 was talked about somewhere as an auctioneered

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1 function. Forget about the difference between
2 auctioneering, and ABT, that's a separate issue. Just
3 I thought I remembered you telling me it was actually
4 discussed somewhere other than in chapter eight.

5 MR. BARTELME: Right, this is Jeff
6 Bartelme, we just had those more general discussions
7 of auctioneering power for those Charlie divisions
8 within the I&C systems, but we don't have any more
9 specific discussion about the mechanism for the
10 feeding of the AC UPSS Charlie.

11 MEMBER BROWN: Okay, so we kind of left
12 that hanging in a way, I referred to them as ABT
13 operations, and you all had called out some place
14 about auctioneering. I don't have a problem with the
15 DC part that you referred to earlier, because it was
16 covered in a number of sections in chapter seven, and
17 that's what triggered when I was looking, trying to
18 make my notes again, that there wasn't anything on the
19 C ones. So, you answered me, there is nothing.

20 MR. BARTELME: Yeah.

21 MEMBER BROWN: Okay, that's fine, I will
22 try to correct what I wrote down then. The other one
23 was the safe shutdown configuration, you referred to
24 it as being specified in the tech specs, is that
25 correct?

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1 MR. BARTELME: Correct, in the definitions
2 section of tech specs, a safe shutdown definition.

3 MEMBER BROWN: Okay, and I commented that
4 I thought this was an obscure location, and thought
5 you ought to have it in more easily recognized
6 sections as you go through the various chapters, but
7 anyway, that's just repeating myself. It was in the
8 tech spec, I got that, that's all I had. No, I had
9 one more. Natural gas, we had some discussion on
10 natural gas, and I was left hanging on -- I guess my
11 comment was we ought to note that it's supplied from
12 an offsite utility.

13 And then we kind of bounced around in a
14 couple of discussions, and other people said
15 something, and I lost track of how that one was left.
16 Is somebody going to consider noting that in chapter
17 eight as the supply for this SGS? Or someplace else?

18 MR. BARTELME: This is Jeff from SHINE,
19 that consideration, we can look at clarifying that in
20 the SGS discussion in chapter eight.

21 MEMBER BROWN: Okay, so you would look at
22 clarifying?

23 MR. BARTELME: Yeah.

24 MEMBER BROWN: Okay, I'm writing it real
25 quick here, before I forget it.

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1 DR. SCHULTZ: Ron, one quick comment, and
2 this is not associated with the discussion today,
3 although Matt did bring it up. Really appreciate the
4 report on the inspection that was performed in May.
5 I thought that the staff did an excellent job, very
6 comprehensive report on a detailed inspection of the
7 facility, and of course that's a compliment also to
8 the applicant.

9 Because usually when an inspection is done
10 so thoroughly with only minor comments associated with
11 findings, that reflects the cooperation, as well as
12 the detail that has been put in by the applicant in
13 moving things forward in an appropriate way. So,
14 really appreciated what the staff had done there, and
15 documented as a result of that inspection.

16 MEMBER REMPE: There's one other point, I
17 know we've talked about this chapter seven
18 instrumentation timing audit report, and do you have
19 an idea of when we'll be able to see it, and would it
20 be in time to do anything, including for this
21 discussion in the letter?

22 MR. BORROMEO: So, what we can do at a
23 minimum, is point at the calculations that we took a
24 look at, where we took a sample of the timings. We're
25 still completing the chapter seven review now, and

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1 we'll have to get back to you on the exact timing.

2 MEMBER REMPE: The letter's not due until
3 October, I just was curious, because if so, we might
4 want to close out, because we brought this up in
5 chapter four, as well as chapter 13 trying to
6 understand the timing, but we can wait until later.

7 MR. BORROMEO: Okay, we'll work with
8 Chris, and get you a date.

9 MEMBER REMPE: Thank you.

10 CHAIR BALLINGER: I hear some shuffling
11 out there. Okay, I think that we are finished for the
12 day. So, hearing -- at the risk of hearing something
13 else --

14 MR. BALAZIK: Professor, this is Mike
15 Balazik, NRC staff, there was one item that we did
16 talk about, and that's kind of pulsing the members on
17 the August 17th trip out to SHINE, is that going to be
18 done during this forum, or a different forum?

19 CHAIR BALLINGER: That's probably a full
20 committee discussion, right? No?

21 MR. BALAZIK: On what they are interested
22 in seeing when they go out to the SHINE facility.

23 CHAIR BALLINGER: Yeah, Chris has reminded
24 me, we have periodic, frequent actually, informal
25 discussions about things like this, and so we'll have

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1 input from the members, and do it in the informal that
2 we'll have. That means we'd like to have input from
3 the members before we have the informal.

4 MEMBER REMPE: So, you are opening up the
5 floor now for what members would like to see right
6 now, or you want to wait until later? I'm confused
7 now.

8 CHAIR BALLINGER: I'm not, I mean we don't
9 have the whole committee here, so we don't know who's
10 going, and who's not from the committee.

11 MR. BROWN: Yeah, this is Chris Brown.
12 So, we had planned an informal meeting with Mike
13 Balazik, and Shawn, and actually Shawn wanted to come
14 in in July, and we were going to actually try to talk
15 to them in person, so we thought about doing an
16 informal meeting. If you feel that it's appropriate,
17 you can get out some things that you want to see when
18 you go visit SHINE now, I don't see a problem with
19 that, but we can still have an informal meeting with
20 them later.

21 MEMBER REMPE: To help us with the
22 discussion, give us an idea of how the construction is
23 going along, and what all is installed, and not
24 installed, I'm not sure I've heard that in recent
25 times. Maybe Ron, and Chris had been up to date, but

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1 what's the site look like right now?

2 CHAIR BALLINGER: The staff was there,
3 right? No?

4 MR. BORROMEO: Yeah, so we were just there
5 under construction, but Jeff, maybe you could provide
6 a quick update of where you're at in the construction
7 space.

8 MS. RADEL: Yeah, so this is Tracy, I can
9 provide a bit of a status. So, much of the build out
10 of the administration annex is pretty far along, built
11 out with all the framing, and the switch gear has been
12 set, and that auxiliary system installation is well
13 underway. Framing out of the control room area,
14 battery rooms, that portion, the entire building has
15 got the siding, and roofing, and exterior completed.

16 Installation of process piping is well
17 underway, both shock welding, and in the field down in
18 the trench. We are placing tanks within the tank
19 vaults in the sub grade area. The liners are
20 installed in all of the IU cells, and TSV off gas
21 system cells. The support structures for the neutron
22 drivers are arriving, and the installation of those
23 support structures will begin shortly.

24 The significant amount of equipment has
25 arrived at the warehouse, so we have six of our eight

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1 subcritical assembly system skins at the warehouse
2 waiting for installation. The super style shipments
3 are starting to arrive, so there's work going on in
4 the facility to install the base plates for the super
5 cell. So, lots of different activities going on right
6 now.

7 CHAIR BALLINGER: So, by the time we would
8 go out there, there's going to be a substantial amount
9 of work that's been done.

10 MEMBER REMPE: Are there some areas where
11 we would not be welcome to visit, so we should exclude
12 from our wish list, because of ongoing construction
13 activities, or just difficulties for access that we
14 should be concerned about, that you won't let us see?

15 MS. RADEL: There are not any areas that
16 we would limit other than to protect your safety, and
17 we would make sure that we follow the site rules as
18 far as confined space. We wouldn't allow entry into
19 a confined space, or entry into the room where the
20 switch gear is, because it has been hooked to power,
21 and energized. So, there's certain things safety wise
22 that we would make sure to observe the site rules on.

23 But for the most part you would be able to
24 see into all areas, just certain areas you wouldn't be
25 able to enter, because of the requirements for safety.

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1 CHAIR BALLINGER: Okay, so at least that's
2 a good starting point. Okay, at the risk of starting
3 another conversation, I think we are done for the day,
4 thank you very much for a really great discussion. We
5 are pretty unfettered in our questioning, so it's good
6 that everybody was here. So, thank you once again,
7 and we are adjourned.

8 (Whereupon, the above-entitled matter went
9 off the record at 3:58 p.m.)

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