

From: Ed Miller
Sent: Thursday, March 7, 2024 8:24 AM
To: Yan.Gao@dominionenergy.com
Subject: Draft RAIs for Inverter CT LAR (L-2023-LLA-0157)
Attachments: Draft RAI for Summer Inverter CT LAR.docx

Mr. Gao,
Attached is the NRC staff's draft RAI for the subject request. The questions are being transmitted to you to determine 1) If the questions clearly convey the NRC information needs, 2) Whether the regulatory basis for the questions are clear, and 3) If the information has already been provided in existing docketed correspondence. Additionally, review of the draft question will allow you to determine what response time you can support. After you've had a chance to review, please let me know if you would like to have a clarification call or public meeting to discuss. Thank you.

Ed Miller
(301) 415-2481

Hearing Identifier: NRR_DRMA
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DRAFT REQUEST FOR ADDITIONAL INFORMATION
BY THE OFFICE OF NUCLEAR REACTOR REGULATION
LICENSE AMENDMENT REQUEST
TO MODIFY TS 3.8.3.1
DOMINION ENERGY SOUTH CAROLINA, INC.
VIRGIL C. SUMMER NUCLEAR STATION UNIT 1
DOCKET NO. 50-395

By letter to the U.S. Nuclear Regulatory Commission (NRC) dated November 9, 2023 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML23317A224), as supplemented by letter dated November 28, 2023 (ADAMS Accession No. ML23332A194), Dominion Energy South Carolina Inc. (the licensee) submitted a request to modify TS 3.8.3.1 to increase the completion time associated with the 120-volt A.C. Vital Busses.

The NRC staff reviewed the proposed changes to TS 3.8.3.1, “Onsite Power Distribution – Operating,” and noticed the proposed formatting of requirements appears inconsistent with the Summer TSs. Please provide justification for or resolve the following items:

- a. The LAR does not propose to add the term “OPERABLE” to the description of LCO 3.8.3.1, while the proposed change introduces “OPERABLE” and “inoperable” in the associated action statements.
- b. The proposed change to TS 3.8.3.1 action c would introduce the terms “INOPERABLE” and “OPERABLE” to the requirements under LCO 3.8.3.1. The use of terms with all-capital letters typically indicates they are defined in TS 1.0, “Definitions.” However, “INOPERABLE” is not found in TS 1.0.
- c. The proposed change to TS 3.8.3.1 action c would describe the condition where the LCO is not met as “With one of A.C. Vital Bus Inverters #5901, 5902, 5903, or 5904 INOPERABLE...” However, these inverters are not explicitly listed in LCO 3.8.3.1; the A.C. vital busses are described as energized from “an associated inverter.” (Additionally, the revised clean TS page provided in the LAR does not match the changes in the proposed TS markup page.)