

50

Elliott, Robert

From: Schulten, Carl *MR*
Sent: Friday, August 26, 2011 4:18 PM
To: Martin, Robert; Elliott, Robert
Subject: RE: North Anna Tech Specs

Bob, my thoughts..... begin with a question: What is the degraded condition(s) that needs to be addressed by an operability determination? ODs are required "upon discovery of a degraded or nonconforming condition." Earthquakes are external events. A bridge analogy would be appropriate for this external event. TSs are operational restrictions derived from the analyses and evaluations in the safety analysis report. For a design feature, consider a bridge following an earthquake... the bridge is inspected before traffic is allowed to resume... did the OBE or DBE render TSs required SSCs degraded? If so, then an OD is required.

Note that if Safety Limits were violated for any reason and the Rx is shutdown, TSs require the licensee to have staff approval for startup.

From: Martin, Robert *MR*
Sent: Friday, August 26, 2011 1:23 PM
To: Schulten, Carl; Elliott, Robert
Cc: Kolcum, Gregory; Clagg, Rodney
Subject: North Anna Tech Specs

Based on the way the NA Tech Specs are constructed, is there anything in them that requires licensee action in response to a seismic event?

If they exceed their OBE?

If they exceed their DBE?

If not the TS, would consideration of the condition of Operability require licensee evaluation/actions?

D
49