

NRR-PMDAPEm Resource

From: Lingam, Siva
Sent: Friday, January 13, 2012 5:42 PM
To: 'cdmackaman@tva.gov'
Cc: Howe, Andrew
Subject: Sequoyah, Unit 1 LAR - Heavy Load Lifts and UHS One Time Change in Support of Unit 2 SGRP (TAC No. ME7225)

Please , note the following official RAI from our PRA Branch (APLA), and provide your response within 30 days:

In the submittal, the licensee has identified the change in risk associated with the requested ERCW alignments as $7.2E-7$ /year (CDF) and $4.05E-8$ /year (LERF); this is the risk increase above the nominal risk of maintaining the normal ERCW alignment. Also, the licensee has identified the additional risk of performing heavy load lifts as $7.0E-9$ /year (CDF) and $5.0E-10$ /year (LERF), given that the ERCW is in its proposed special alignment. The risk increase incurred due solely to the special ERCW alignment is two orders of magnitude greater than the heavy load lift risk increase. It is assumed by the NRC staff that if the ERCW is not aligned as described, then the risk increase associated with the heavy load lifts would be significant, or at least greater than the $7.2E-7$ /year (CDF) and $4.05E-8$ /year (LERF) reported for the ERCW alignment. However, the risk metrics associated with performing the same heavy load lifts with ERCW in its normal alignment was not provided in the submittal, which would permit the NRC staff to assess the relative risk impacts. Therefore, the NRC staff cannot conclude that the special ERCW alignment is necessary to avoid a more significant risk increase during the heavy load lifts.

The licensee is requested to justify the need for the ERCW alignment and the resulting risk increases incurred by providing the risk metrics associated with heavy load lifts if the normal ERCW alignment is maintained.

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