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Martin, Robert

From: Auluck, Rajender | NRK
Sent: Friday, September 16, 2011 2:48 PM
To: Khanna, Meena; Martin, Robert
Cc: Galloway, Melanie; Sheikh, Abdul
Subject: North Anna Restart memo DLR comments.docx
Attachments: North Anna Restart memo DLR comments.docx

Meena/Bob,

Melanie asked us review the action plan for North Anna and provide comments. Attached are our comments on the proposed action plan. Please call me for any questions.

Thanks,

Raj

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Item No. 1 (page 2, last paragraph):

The staff's assessment will utilize the guidance provided in NRC's Regulatory Guide (RG) 1.167, which endorses the EPRI's guidelines. In addition, the staff may also utilize the information provided in IAEA Safety Report Series No. 66, "Earthquake Preparedness and Response for Nuclear Power Plants," to determine the adequacy of the licensee's restart determinations. It should be noted that the IAEA Safety Report acknowledges the prospect that hidden damage (especially after an SSE) is a real possibility and its effects should be evaluated with analytical work. Since the August 23, 2011 earthquake magnitude exceeded the plant's SSE, the staff will review the licensee's evaluation for restart to ensure that the plant structures, systems, and components will remain operable for seismic response observed during the earthquake with an adequate margin of safety. Specific actions are identified in the table below, entitled, "North Anna Nuclear Power Plant Restart Action Plan Milestones."

Item No. 2 (page 3, top)

The initial acceptance criteria that will be utilized by the staff for approval of plant restart include satisfactorily addressing the following:

- (1) Confirmatory inspections by the Region,
- (2) Visual walkdowns by the licensee in accordance with the EPRI guidelines by personnel trained and qualified in accordance with ASME and ACI Codes.
- (3) Review and acceptance by the staff of short term evaluations performed by licensee for pre-restart, and
- (4) Review and acceptance by the staff of identification of long term evaluations by the licensee for the period after restart

Item No. 3 (page 3, bottom)

The first phase involves continued collection of issues that the staff expects the licensee to address, in a systematic approach (i.e., sections of the North Anna Updated Final Safety Analysis Report) prior to re-start and post-restart. Objectives during this phase include assembling a catalogue of questions to request of the licensee to address in either inspection or licensing. The first phase includes inspection and assessment of the licensee's walkdowns and activities, via the Augmented Inspection Team.

Item No. 4 (page 4)**Project Success Criteria Include:**

The NRC staff will conduct an effective, independent review of the licensee's analysis and recovery actions to ensure that the licensee adequately implements the RG 1.167 and EPRI guidelines to effectively address short and long-term plant restart issues. The staff may also use any pertinent information contained in the IAEA Safety Report No. 66. The staff will conduct a systematic review, using the North Anna UFSAR, and conduct audits and confirmatory walkdowns/inspections, as appropriate. Stakeholders are informed of and educated about the safety significance of this issue.

Item 5

Containment Integrity

Since the August 23, 2011 earthquake magnitude exceeded the plant design basis, including SSE, there is a potential for hidden damage, specially the containment structure. Therefore, as a minimum, containment integrity should be verified by performing ILRT before the restart. This will supplement the walkdowns and evaluations performed by the applicant and the Augmented Inspection Team.

Item 6

The acceptance criteria for restart should also include evaluation of the impact of the earthquake on the aging management and inservice inspection programs. There may be a need to change the scope and frequency of the different programs due to information identified during walkdowns and evaluations.