

Boyle, Patrick

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From: Khanna, Meena *mmk*
Sent: Monday, September 19, 2011 1:59 PM
To: Karwoski, Kenneth; Boyle, Patrick; Martin, Robert
Cc: Manoly, Kamal; Wilson, George; Hiland, Patrick
Subject: Guidance Regarding Review of North Anna Submittal Regarding Summary Report of Aug. 23 Earthquake Response and Restart Readiness Determination Plan

Pls provide any comments...thanks!

BCs and Technical Staff,

First of all, I would like to mention that DORL has developed a team to specifically address the North Anna Restart Activities. The members of the team include: Meena Khanna, Ken Karwoski, Bob Martin and Patrick Boyle. Pls. include these folks on any items associated with this initiative.

I would like to also thank you for all of your commitment and dedication in supporting the North Anna Restart initiative. We greatly appreciate the efforts that you all took in developing questions prior to VEPCO's submittal. Pls. note that since the team was made aware that VEPCO intended to submit its plan on Saturday, we decided to only issue the questions relating to fuel and reactor systems, to support the fuels audit that began today. Having said that, we would like each one of you to please review VEPCO's document and use the acceptance criteria below (which was endorsed by OGC) and determine which questions that were originally developed and any other additional questions you would like to submit for final issuance to the licensee.

In order to conduct a consistent review across NRR, the team has established the following review process, as outlined below:

1. All technical branches are requested to provide a response to the team. If a branch has determined that it will not have any review scope of this initiative, then the BC is requested to send an email to the team indicating so.
2. All technical branches to finalize list of questions using the guidance provided above as well as the acceptance criteria below. BCs are to concur on the RAls prior to submitting to the team members. Due date for questions is September 27; however, as questions are finalized, pls send them asap.
3. Pls. identify your questions, if possible, within the three following categories:
 - a. Inspection/Followup Walkdown activities for Region II
 - b. Short term – questions regarding walkdowns, inspections, and evaluations prior to plant restart
 - c. Long term – questions regarding inspections and evaluations post restart
4. Ken Karwoski and Kamal Manoly will review the questions to ensure that they are in accordance with the acceptance criteria, below, and will discuss with technical staff and BCs, as appropriate.
5. Gerry McCoy (Region II) will also be reviewing the questions to ensure that they have not already been addressed via the Augmented Inspection Team initiative.
6. We will develop guidance/template for the SE input and provide that to you in the near future.

Acceptance Criteria for Staff Review of VEPCO's Submittal RE: North Anna Earthquake Response and Restart Readiness Determination Plan

North Anna may use a variety of approaches for ensuring that no functional damage occurred as a result of the earthquake, for example, the licensee may analyze and evaluate the actual earthquake to show that SSCs were not adversely affected. In lieu of analyses/evaluations or in combination with them, the licensee may inspect and/or test various SSCs to demonstrate that there was no functional damage.

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The licensee's submittal should be reviewed to confirm that the licensee's analyses, evaluations, inspections, or tests, as appropriate, are adequate for demonstrating that no functional damage resulted from the earthquake.

The review should include systems, subsystems, trains, components and devices (systems, structures, or components [SSCs]) (1) that are required to be operable by TSs, (2) SSCs not explicitly required to be operable by TSs, but that perform required support functions to maintain a TS required system operable (e.g., SSCs inspected/tested per the ASME Code); and (3) SSCs that are not described in TSs but which warrant programmatic controls to ensure that SSC availability and reliability are maintained (e.g., non-safety related SSCs that are risk significant). Refer to NRC Inspection Manual Part 9900, "Operability Determinations and Functionality Assessments for Resolution of Degraded or NonConforming Conditions Adverse to Quality or Safety" for more detailed guidance for determinations of operability and resolution of degraded or nonconforming conditions.

Note: For ground motions less than 0.3 g, only a few SSCs at North Anna were identified during the IPEEE review that did not have a high confidence of low probability of failure. These SSCs probably warrant increased attention (they are identified in the licensee's submittal).

Review guidelines (will expand later):

The following documents provide guidelines for staff review:

RG 1.167

EPRI NP-6695

IAEA Safety Report No. 66 – Lessons learned from KK plant

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