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**Martin, Robert**

**From:** Manoly, Kamal *mk*  
**Sent:** Monday, September 19, 2011 9:26 AM  
**To:** Martin, Robert  
**Subject:** RE: OEDO monthly meeting

Bob,  
It is much easier to explain my position in person than long emails that have become chronic around here!

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**From:** Martin, Robert *mk*  
**Sent:** Sunday, September 18, 2011 9:40 AM  
**To:** Manoly, Kamal  
**Subject:** FW: OEDO monthly meeting

What do you think?

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**From:** Boyle, Patrick *mk*  
**Sent:** Friday, September 16, 2011 12:57 PM  
**To:** Khanna, Meena; Martin, Robert  
**Subject:** RE: OEDO monthly meeting

This completely misses the lessons learned from the KK event. The short-term scope is what the licensee has already proposed and our technical staff is calling inadequate. The short-term scope is acceptable for OBE but not SSE events. The normal operability testing (i.e. TS-SR) will not adequately assess for seismic damage. We need the licensee to confirm the safety-related equipment is capable of performing its intended function following the impact of this event and during a new, yet to be determined, SSE. They have to tell us what they are using for a new SSE and demonstrate the ability of SSC to function when subject to those forces.

Further discussion:

They are NOT in compliance with GDC 2 "Design for the protection against natural phenomena" until the design is corrected to consider the most severe natural phenomena that have been historically reported for the site and surrounding area with sufficient margin. The request we have before us is permission to operate the plant with degraded but operable components. The NRC has permitted this in the past, but typically on discrete components at the time of discovery. This has the potential to affect every safety-related SSC in the plant, which is a completely different scope. It would be the same as issuing a NOED for the entire plant.

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**From:** Khanna, Meena *mk*  
**Sent:** Friday, September 16, 2011 12:01 PM  
**To:** Boyle, Patrick; Martin, Robert  
**Subject:** FW: OEDO monthly meeting

Here is draft acceptance criteria, let me know what you think...

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**From:** Khanna, Meena  
**Sent:** Friday, September 16, 2011 11:26 AM  
**To:** Schulten, Carl  
**Cc:** Wilson, George; Manoly, Kamal; Karwoski, Kenneth  
**Subject:** FW: OEDO monthly meeting

Carl, pls let us know what you think regarding this proposed acceptance criteria for the assessment of North Anna. We are available to discuss when you have time. Thanks.

*D*  
*180*

Technical Acceptance Criteria for demonstrating the acceptability for plant restart (short-term):

Confirm the adequacy of the scope of licensee's inspections, testing and analysis to demonstrate no functional damage (i.e., must demonstrate SSCs are operable/functional for the **current licensing basis**). For definitions of operable/functional, pls. see NRC Inspection Manual Part 9900, "Operability Determinations and Functionality Assessments for Resolution of Degraded or NonConforming Conditions Adverse to Quality or Safety."

For long term (post-restart), the licensee shall evaluate the need to revise its CLB with regards to the new seismic risk (based on the SSE seen at the site as well as the GI-199 information).

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**From:** Khanna, Meena  
**Sent:** Friday, September 16, 2011 9:24 AM  
**To:** Giitter, Joseph; Howe, Allen  
**Cc:** Wilson, George; Evans, Michele; Karwoski, Kenneth  
**Subject:** RE: OEDO monthly meeting

Response on why we don't make them modify their licensing basis prior to restart:

1. IPEEE shows that the plants have 0.3 g High Confidence, Low Probability of Failure (HCPLF) with a few exceptions that do not impede the plant's shutdown capability and the capacity of these exceptions exceed the measured accelerations.
2. The staff evaluation in the safety assessment report of GI-199 indicates that North Anna is among the subset of plants in the CEUS that were calculated to have a delta core damage frequency between 10 E-4 and 10 E-5, which the staff considered reasonable for continued operation. Not knowing whether some equipment may exceed their design basis limits does not preclude inoperability. However, the staff expects that functionality of equipment, that may have exceeded its DB, shall be ascertained via walkdowns, analysis, and testing.

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**From:** Giitter, Joseph *JMG*  
**Sent:** Friday, September 16, 2011 7:14 AM  
**To:** Howe, Allen  
**Cc:** Wilson, George; Khanna, Meena; Evans, Michele  
**Subject:** RE: OEDO monthly meeting

Nicely done. Have in your hip pocket a response on why we don't make them modify their licensing basis prior to restart.

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**From:** Howe, Allen *ALH*  
**Sent:** Thursday, September 15, 2011 5:32 PM  
**To:** Leeds, Eric  
**Cc:** Wilson, George; Evans, Michele; Giitter, Joseph; Khanna, Meena  
**Subject:** OEDO monthly meeting

Eric – George Wilson and I plan to support you at the OEDO monthly meeting to discuss North Anna. We coordinated with RII to be ready to status the AIT. I have included some info below that I plan to use to outline our approach and answer questions.

EDO Monthly Briefing - Agenda Item: North Anna Restart (Requirements and Approval)

Draft Talking Points:

**Region II:**

- Overview of AIT findings/exit meeting, etc.
- Discuss plans for startup inspection

**NRR:**

- Public meeting was held with Dominion on September 8.
  - Technical staff provided questions that Dominion should consider for plant restart.
  - Public interest from a 2.206 petition, Office of the AG of NY State, Rep Markey to Chairman.
  - Additional Public Meetings with full meeting support (broadcast, phone lines, transcription, closed captioning, etc.) should be anticipated prior to restart because of the level of interest (requires OPA support).
- NRR is developing an Action Plan and a Communication Plan to address North Anna Restart.
- Following the September 8<sup>th</sup> public meeting, the staff continues to develop questions for Dominion to consider with respect to plans for restart.
  - To date, questions regarding fuels and reactor systems have been issued.
  - Other questions are being developed, using the SRP, EPRI NP-6695 guidelines, and the IAEA Safety Report No. 66 regarding the Japan KK lessons learned/short and long term actions taken.
- Dominion plans to submit its restart report COB, today or on Saturday.
  - Report to address characterization of event, post earthquake inspections (to include those of reactor vessels and internals, new and irradiated fuel, spent fuel racks), ISFSI installation, near term actions prior to start-up.
- Audit planned for week of Sept 19 on fuels.
- Path Forward:
  - Perform technical, legal, and licensing review of startup plan from Dominion and submit questions per the RAI process.
  - Continuing to schedule audits at site, as necessary.
  - Coordinating with Region II on all activities – including additional audits and inspections.
  - Staff has contacted OGC for support in drafting an Order.
- Requirements and Approval:
  - The staff's assessment will utilize the guidance provided in NRC's Regulatory Guide (RG) 1.167, which endorses the EPRI's guidelines as useful information to inform its technical review. In addition, the staff will utilize the IAEA Safety Report Series No. 66, "Earthquake Preparedness and Response for Nuclear Power Plants," to provide insights as to 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.
  - The staff plans to issue an order reiterating (and augment as needed) plant restart commitments/actions, may include analysis and plant modifications based on the technical evaluation and safety evaluation report for the restart plan. Any modifications will need to satisfy 10 CFR 50.109(a)(4)(ii) [adequate protection] requirements.
  - 10 CFR Part 100, App. A requirements (OGC has provided verbal feedback that advice that Pt 100, App A, section V(a)(2) applies to NA situation.).

Thanks - Allen