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Boyle, Patrick

From: Stuchell, Sheldon *MSK*
Sent: Monday, September 19, 2011 5:15 PM
To: Khanna, Meena; Karwoski, Kenneth
Cc: Manoly, Kamal; Wilson, George; Boyle, Patrick; Martin, Robert; Jolicoeur, John
Subject: RE: North Anna Acceptance Criteria R2 Comments.docx
Attachments: North Anna Acceptance Criteria Consolidated Comments.docx

Meena,

I took a quick swag at the acceptance criteria, and have attached with the new paragraph.

Sheldon

From: Khanna, Meena *MSK*
Sent: Friday, September 16, 2011 5:38 PM
To: Karwoski, Kenneth; Stuchell, Sheldon
Cc: Manoly, Kamal; Wilson, George; Boyle, Patrick; Martin, Robert
Subject: North Anna Acceptance Criteria R2 Comments.docx

Ken and Sheldon,

Attached are some comments that we received regarding the proposed acceptance criteria from Gerry McCoy in Region II. Could we pls meet on Monday to discuss and then conduct a call with him? I plan to go ahead and send the proposed acceptance criteria to OGC so that we can obtain input from them in parallel.

Thanks!

Meena

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Short-Term Technical Acceptance Criteria
For Demonstrating The Acceptability For North Anna Plant Restart

Confirm the adequacy of the scope of the licensee's inspections, tests and analyses which demonstrate that no functional damage resulted from the earthquake to systems, subsystems, trains, components and devices (systems, structures, or components [SSCs]) for the current licensing basis (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; and (3) SSCs that are not described in TSs but which warrant programmatic controls to ensure that SSC availability and reliability are maintained. 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.

Comment [GJM1]: This is so general, I have trouble understanding what it means. It seems to catch anything which anyone feels is important. That doesn't rule much out! Maybe this is where we talk about risk significant, or safety related components (see the next comment)

Comment [GJM2]:

(1) Should we also include SSCs which are not safety related, but are risk significant?

(2) Is there a possible to have SSCs which are safety related but not covered by TSs? If so, are they captured? Without finding a copy of the TS, I know there are no LCO's for the RCS piping if it is inoperable, yet it should be covered by this review.

(3) Part 9900 provides guidance on what to do if a non-conforming condition is identified. The licensee's effort is first a search for non-conforming conditions, and after that, an evaluation of what was found. What guidance do we have available, or what guidance can we use to determine whether the search was adequate?

Confirm the adequacy of the scope of the licensee's inspections, tests and analyses which demonstrate that no functional damage resulted from the earthquake to systems, subsystems, trains, components and devices (systems, structures, or components [SSCs]) for the current licensing basis (1) that are required to be operable by TSs, (2) that perform required support functions to maintain a TS required system operable; and (3) that are risk significant or safety related. 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. The licensee must provide a plan for NRC approval, detailing the methods used to search for non-conforming conditions, and the resulting evaluation method if non-conforming conditions are found. The plan must include a determination of an adequate search.