NRR-PMDAPEm Resource

From: Wentzel, Michael
Sent: Tuesday, July 18, 2017 10:17 AM
To: Hanek, Olga
Cc: Guth, Mitch; Kilby, Gary
Subject: Draft Request for Additional Information - Turkey Point 3 & 4 LAR-236 (CACs MF5455 & MF5456)

Good afternoon Olga,

By application dated December 23, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15029A297), as supplemented by letters dated June 16, 2016, August 11, 2016, February 9, 2017, and April 27, 2017 (ADAMS Accession Nos. ML16180A178, ML16243A104, ML17060A249, and ML17117A618, respectively), Florida Power & Light Company (FPL, the licensee) submitted License Amendment Request (LAR) No. 236 for Turkey Point Nuclear Generating Unit Nos. 3 and 4 (Turkey Point). The proposed amendments would revise the Technical Specifications (TSs) to Implement TS Task Force (TSTF)-505, Revision 1, "Provide Risk-Informed Extended Completion Times RITSTF [Risk-Informed TSTF] Initiative 4b."

The U.S. Nuclear Regulatory Commission's (NRC's) Electrical Engineering Operating Reactor Branch (EEOB) staff reviewed the application and identified areas where it needs additional information to support its review. The ***draft*** request for additional information (RAI) is provided below.

Please let me know by July 25, 2017, if a clarification call is needed and if the draft RAI contains any proprietary information. If a clarification call is not needed, please let me know if FPL can respond to the RAI by August 24, 2017.

EEOB RAIs

RAI 1

The Commission's Policy on Probabilistic Risk Assessment ("Use of Probabilistic Risk Assessment Methods in Nuclear Regulatory Activities," dated August 16, 1995) identifies five key safety principles required for risk-informed decision-making applied to changes to TSs as delineated in RG 1.177 and RG 1.174. They are:

- The proposed change meets current regulations;
- The proposed change is consistent with defense-in-depth philosophy;
- The proposed change maintains sufficient safety margins;
- Increases in risk resulting from the proposed change are small and consistent with the Commission's Safety Goal Policy Statement; and
- The impact of the proposed change is monitored with performance measurement strategies.

NEI 06-09, "Risk Informed Technical Specifications Initiative 4b: Risk Managed Technical Specifications (RMTS)," Revision 0-A, states that Risk Management Actions (RMAs) and compensatory actions for significant components should be predefined to the extent practicable in plant procedures and implemented at the earliest appropriate time in order to maintain defense-in-depth.

Moreover, the NRC staff's safety evaluation for NEI 06-09, Section 4.0, "Limitations and Conditions," (ADAMS No. ML12286A322) states that a licensee's LAR adopting the NEI 06-09 initiative will describe the process to identify and provide compensatory measures and RMAs during extended Completion Times (CT), and provide examples of compensatory measures/RMAs.

In the license amendment request (LAR) dated December 23, 2014, Enclosure 12, “Risk Management Action Examples,” the licensee provided two examples of risk management actions that are considered during a Risk-informed Completion Time (RICT) for: a) inoperable diesel generator, and b) inoperable battery.

Provide similar examples of RMAs to assure a reasonable balance of defense-in-depth is maintained for the following TS actions:

TS LCO/Action	**Description**	**Current Completion Time**
3.8.1.1 a Mode 1	One of two startup transformers inoperable	48h
3.8.1.1 a Modes 2, 3, 4	One of two startup transformers inoperable	24h
3.8.1.1 b**	One required diesel generator inoperable and one startup transformer inoperable	72h
3.8.2.1 a	One battery charger not capable of being powered from its associated diesel generator	72h
3.8.3.1 a	One train of AC emergency busses not fully energized	8h
3.8.3.1 b (Unit 3)	Any required LCs and/or MCCs associated with the opposite unit inoperable:	
	With all AC Trains OPERABLE - LC 4C and/or MCC 4C Inoperable	2h (or N/A)
	With all AC Trains OPERABLE - LC 4H and/or MCC 4D Inoperable	2h (or 72h)
	With all AC Trains OPERABLE - LC 4B and/or MCC 4B Inoperable	2h (or N/A)

TS LCO/Action	Description	Current Completion Time
	With AC Trains 3A, 3B, & 4A OPERABLE - LC 4A Inoperable	72h
	With AC Trains 3A, 3B, & 4A OPERABLE - LC 4C and/or MCC 4C Inoperable	2h (or N/A)
	With AC Trains 3A, 3B, & 4A OPERABLE - LC 4H and/or MCC 4D Inoperable	2h (or 72h)
	With AC Trains 3A, 3B, & 4B OPERABLE - LC 4H and/or MCC 4D Inoperable	2h (or 72h)
	With AC Trains 3A, 3B, & 4B OPERABLE - LC 4B and/or MCC 4B Inoperable	2h (or N/A)
	With AC Trains 3A, 3B, & 4B OPERABLE - LC 4D Inoperable	72h
3.8.3.1 b (Unit 4)	Any required LCs and/or MCCs associated with the opposite unit inoperable:	
	With all AC Trains OPERABLE - LC 3C and/or MCC 3C Inoperable	2h (or N/A)
	With all AC Trains OPERABLE - LC 3H and/or MCC 3D Inoperable	2h (or 72h)

TS LCO/Action	Description	Current Completion Time
	With all AC Trains OPERABLE - LC 3B and/or MCC 3B Inoperable	2h (or N/A)
	With AC Trains 4A, 4B, & 3A OPERABLE - LC 3A Inoperable	72h
	With AC Trains 4A, 4B, & 3A OPERABLE - LC 3C and/or MCC 3C Inoperable	2h (or N/A)
	With AC Trains 4A, 4B, & 3A OPERABLE - LC 3H and/or MCC 3D Inoperable	2h (or 72h)
	With AC Trains 4A, 4B, & 3B OPERABLE - LC 3H and/or MCC 3D Inoperable	2h (or 72h)
	With AC Trains 4A, 4B, & 3B OPERABLE - LC 3B and/or MCC 3B Inoperable	2h (or N/A)
	With AC Trains 4A, 4B, & 3B OPERABLE - LC 3D Inoperable	72h
3.8.3.1 c (1)	One AC vital panel not energized from its associated inverter or connected to its associated DC bus	2h
3.8.3.1 c (2)	One AC vital panel not energized from its associated inverter or connected to its associated DC bus	24h

TS LCO/Action	Description	Current Completion Time
3.8.3.1 d	One DC BUS not energized from its associated battery bank or charger	2h (or 24h with 1 unit in Mode 5 or 6)

RAI 2

In the LAR, Enclosure 1, Table E1-1 (In Scope TS/LCO Conditions to Corresponding PRA Functions) describes the design success criteria for each TS Limiting Condition for Operation (LCO).

Provide a revised Table E1-1 for the Electrical Power Systems TSs that includes details for each action statement (see table in RAI 1 depicting details by TS action rather than by condition) to be utilized in the RICT Program. Provide the design success criteria for each action and clarify the absolute minimum set of equipment needed to accomplish the safety function.

RAI 3

In Attachment 2 of the LAR, the TS mark-ups include the TS Tables 3.8-1 (Unit 3) and 3.8-2 (Unit 4) corresponding to action 3.8.3.1 b for inoperability of the opposite unit's LCs and MCCs. The licensee proposed that conditions in these tables be included in the RICT program. However, the conditions for action 3.8.3.1 b were not included in Table E1-2 Unit 3, "In Scope TS/LCO Conditions RICT Estimate."

Provide the estimated RICTs for action 3.8.3.1 b to include each of the applicable conditions in Tables 3.8-1 and 3.8-2.

Hearing Identifier: NRR_PMDA
Email Number: 3654

Mail Envelope Properties (f299cd92222c41acb9ab28c5e2567650)

Subject: Draft Request for Additional Information - Turkey Point 3 & 4 LAR-236 (CACs MF5455 & MF5456)
Sent Date: 7/18/2017 10:16:36 AM
Received Date: 7/18/2017 10:16:00 AM
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Files	**Size**	**Date & Time**
MESSAGE	6912	7/18/2017 10:16:00 AM

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Priority: Standard
Return Notification: No
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