

# NRC Commissioner Briefing on GSI-191 Resolution Status

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# Dominion GL 04-02 Status

- North Anna
- Project complete
- Surry
- RAI response complete; minor modifications pending
- Millstone
- RAI response ongoing
- Kewaunee
- RAI response ongoing

# GSI-191 / North Anna Timeline

- 2003/4 Containment walkdowns
- 07/05 Decision to abandon active strainer - install passive strainer
- 09/05 Response to GL 2004-02 due
- 11/05 AECL chosen as strainer vendor

# GSI-191 / North Anna Timeline

2005-07 Containment reanalysis/LAR

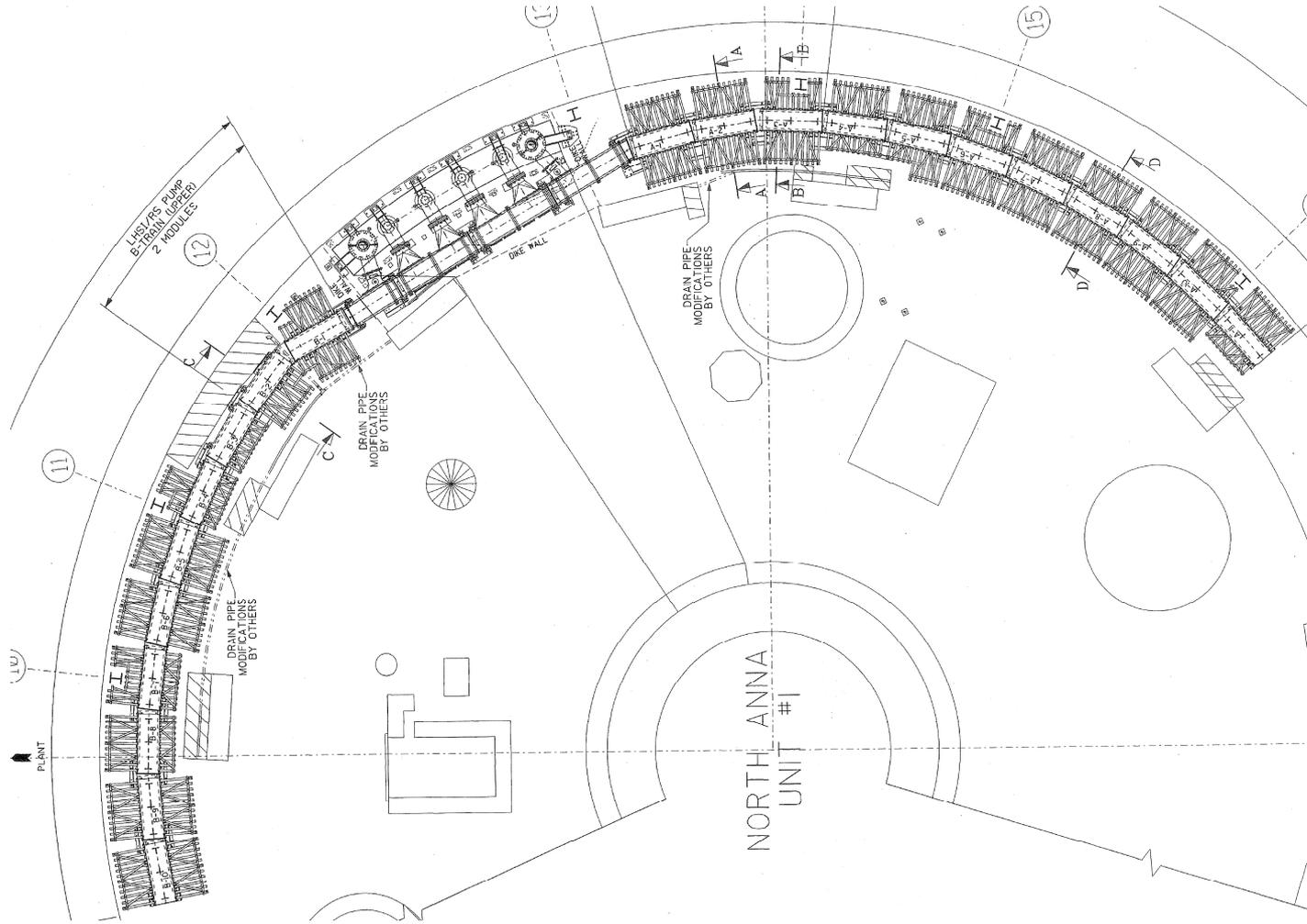
2007-08 Chemical effects testing

2007/08 NRC corrective action and  
chemical effects audits

05/2009 NRC NAPS acceptance letter

~07/2010 NRC SER for in-vessel effects

# NAPS-1 GSI-191 Containment Sump Strainer



# Comparison of Before/After NAPS Strainer Surface Area

Unit/System	Original Design Strainer Area (approximate)	Newly Installed Strainer Area (approximate)	Percent Increase
NAPS Unit 1 RS	168 ft <sup>2</sup> (common)	4400 ft <sup>2</sup>	~3800 %
NAPS Unit 1 LHSI		2000 ft <sup>2</sup>	
NAPS Unit 2 RS	168 ft <sup>2</sup> (common)	4400 ft <sup>2</sup>	~3750 %
NAPS Unit 2 LHSI		1900 ft <sup>2</sup>	

# Obstacles to Success

- Evolving, plant-specific R&D effort
- Multiple licensees - few vendors
- Lack of / ill-defined and evolving acceptance criteria
- Unrealistic regulatory schedules
- Unrealistic regulatory resource impact estimate

# Keys to Success

- Commitment of project team
- Insights from NRC audits
- Selection of research-oriented vendor
- Adequate containment floor space

# Conclusions

- Generic issues are R&D projects and rarely adhere to pre-ordained regulatory schedules
- Implementation of requirements prior to specification of acceptance criteria is counterproductive and ineffective
- Reasonable levels of conservatism provide reasonable assurance of safety