

December 21, 2020

P-CORR-00531-06277

Mr. M. A. LEBLANC
Commission Secretary
Secretariat

Canadian Nuclear Safety Commission
280 Slater Street
Ottawa, Ontario
K1P 5S9

Dear Mr. Leblanc:

Pickering NGS: Clarification to OPG's Previous Request to Amend the Integrated Implementation Plan (IIP) for Resolution Action G04-RS2-06-08

The purpose of this submission is to clarify OPG's request to amend the Integrated Implementation Plan (IIP) resolution action G04-RS2-06-08 and the timing to submit the required fitness for service (FFS) assessment.

On October 28, 2020, OPG requested Commission approval for an extension to IIP resolution action G04-RS2-06-08 from December 31, 2020 to April 23, 2021 (Reference 1), citing the timing of the 2020 Unit 6 planned maintenance outage, in which work associated with the resolution action was to occur.

The IIP resolution action was to perform measurements of calandria tube (CT) to liquid injection shutdown system (LISS) nozzle gaps on Units 5-8 to refine the gap closure rates and demonstrate fitness-for-service per CSA standard N285.4 through the extended operation period. On Unit 6, a mitigation strategy was needed in the 2020 planned maintenance outage (currently ongoing) to prevent CT-LISS nozzle contact prior to end of commercial operation, within the extended operating period of the unit (References 2 and 3).

The extension of resolution action G04-RS2-06-08 was requested due to the time required to complete the modification and complete the final FFS assessment. A final fitness for service assessment is required to be completed within 90 days of outage completion per CSA standard N285.4. In order to close IIP resolution action G04-RS2-06-08, OPG must provide the final FFS assessment, which requires revision of model parameters associated with the modification. The model revision could not be completed until after the modification was complete in the 2020 Unit 6 planned maintenance outage, and therefore the final FFS assessment cannot be provided prior to the IIP end date of December 31, 2020.

Furthermore, the final FFS assessment cannot be completed in the timeline required by CSA standard N285.4 due to its complexity.

The wording of OPG's request may lead people to understand that OPG will provide the final FFS assessment within the 90 day period required by CSA standard N285.4. OPG would like to clarify that the time from the end of the 2020 Unit 6 planned maintenance outage to April 23, 2021 will exceed the 90 days required by CSA standard N285.4 for submission of the final FFS assessment.

It was OPG's intent to request an extension to the CSA standard N284.5-05 clause 11.3.2.2 timeline along with a preliminary FFS assessment based on post-modification measurements. This preliminary FFS assessment was recently completed and will be provided along with the CSA standard N285.4 extension request, to demonstrate low risk associated with the request. It was found that OPG's intent to request this extension was not identified in Reference 1.

If you have any questions, please contact Sara Irvine, Manager, Pickering Regulatory Affairs at 289-314-3367.



Jon Franke
Senior Vice President
Pickering Nuclear

cc: K. Campbell, Acting Director, Pickering Regulatory Program Division,
Ottawa
CNSC Pickering Regulatory Program Division
CNSC Records Office

References:

1. OPG Letter, J. Franke to M. A. Leblanc, "Pickering NGS: Request for Approval to Amend the Integrated Implementation Plan (IIP) to Extend Resolution Action G04-RS2-06-08", October 28, 2020, CD# P-CORR-00531-06202.
2. OPG Letter, R. Lockwood to A. Viktorov, "Pickering NGS Periodic Safety Review 2 – Submission of Integrated Implementation Plan Revision 1", March 1, 2018, CD# P-CORR-00531-05311.
3. OPG Letter, R. Lockwood to A. Viktorov, "Pickering NGS – 2018 Unit 6 Planned Maintenance Outage – Submission of Calandria Tube to Liquid Injection Shutdown System Nozzle Gap Assessment", July 30, 2018, CD# NK30-CORR-00531-07658.