

ArevaEPRDCPEm Resource

From: Pederson Ronda M (AREVA NP INC) [Ronda.Pederson@areva.com]
Sent: Monday, March 30, 2009 5:17 PM
To: Getachew Tesfaye
Cc: DUNCAN Leslie E (AREVA NP INC); BENNETT Kathy A (OFR) (AREVA NP INC); DELANO Karen V (AREVA NP INC)
Subject: Response to U.S. EPR Design Certification Application RAI No. 189, FSARCh. 14
Attachments: RAI 189 Response US EPR DC.pdf

Getachew,

Attached please find AREVA NP Inc.'s response to the subject request for additional information (RAI). The attached file, "RAI 189 Response US EPR DC.pdf" provides a technically correct and complete response to the one question.

Appended to this file are affected pages of the U.S. EPR Final Safety Analysis Report in redline-strikeout format which support the response to RAI 189 Question 14.02-95.

The following table indicates the page in the response document, "RAI 189 Response US EPR DC.pdf," that contains AREVA NP's response to the subject question.

Question #	Start Page	End Page
RAI 189 — 14.02-95	2	2

This concludes the formal AREVA NP response to RAI 189, and there are no questions from this RAI for which AREVA NP has not provided responses.

Sincerely,

Ronda Pederson

ronda.pederson@areva.com

Licensing Manager, U.S. EPR Design Certification

AREVA NP Inc.

An AREVA and Siemens company

3315 Old Forest Road

Lynchburg, VA 24506-0935

Phone: 434-832-3694

Cell: 434-841-8788

From: Getachew Tesfaye [mailto:Getachew.Tesfaye@nrc.gov]

Sent: Friday, February 27, 2009 5:51 PM

To: ZZ-DL-A-USEPR-DL

Cc: Samantha Crane; John Tomon; Juan Peralta; Michael Miernicki; Joseph Colaccino; ArevaEPRDCPEm Resource

Subject: U.S. EPR Design Certification Application RAI No. 189 (2083), FSARCh. 14

Attached please find the subject requests for additional information (RAI). A draft of the RAI was provided to you on February 18, 2009, and on February 26, 2009, you informed us that the RAI is clear and no further clarification is needed. As a result, no change is made to the draft RAI. The schedule we have established for review of your application assumes technically correct and complete responses within 30 days of receipt of

RAIs. For any RAIs that cannot be answered within 30 days, it is expected that a date for receipt of this information will be provided to the staff within the 30 day period so that the staff can assess how this information will impact the published schedule.

Thanks,
Getachew Tesfaye
Sr. Project Manager
NRO/DNRL/NARP
(301) 415-3361

Hearing Identifier: AREVA_EPR_DC_RAIs
Email Number: 351

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Subject: Response to U.S. EPR Design Certification Application RAI No. 189, FSARCh.
14
Sent Date: 3/30/2009 5:17:13 PM
Received Date: 3/30/2009 5:17:17 PM
From: Pederson Ronda M (AREVA NP INC)

Created By: Ronda.Pederson@areva.com

Recipients:

"DUNCAN Leslie E (AREVA NP INC)" <Leslie.Duncan@areva.com>

Tracking Status: None

"BENNETT Kathy A (OFR) (AREVA NP INC)" <Kathy.Bennett@areva.com>

Tracking Status: None

"DELANO Karen V (AREVA NP INC)" <Karen.Delano@areva.com>

Tracking Status: None

"Getachew Tesfaye" <Getachew.Tesfaye@nrc.gov>

Tracking Status: None

Post Office: AUSLYNCMX02.adom.ad.corp

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MESSAGE	2268	3/30/2009 5:17:17 PM
RAI 189 Response US EPR DC.pdf		452288

Options

Priority: Standard

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Reply Requested: No

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Recipients Received:

Response to

Request for Additional Information No. 189 (2083), Revision 0

2/27/2009

U. S. EPR Standard Design Certification

AREVA NP Inc.

Docket No. 52-020

**SRP Section: 14.02 - Initial Plant Test Program - Design Certification and New
License Applicants**

Application Section: 14.2

QUESTIONS for Quality and Vendor Branch 1 (AP1000/EPR Projects) (CQVP)

Question 14.02-95:

RG 1.206 C.I.14.2.11, "Test Program Schedule," states that a COL applicant should identify and cross-reference each test (or portion thereof) required to be completed before initial fuel loading and that is designed to satisfy the requirements for completing ITAAC in accordance with 10 CFR 52.99(a).

Section 14.2.11 of the US EPR FSAR does not assign the COL applicant the responsibility to include provisions to ensure that required tests to be completed before initial fuel loading to satisfy ITAAC are adequately identified.

Therefore, the staff requests that AREVA revise the COL Item in FSAR Section 14.2.11 to include the COL applicant's responsibility to identify and cross-reference each test (or portion thereof) required to be completed before initial fuel loading and that is designed to satisfy the requirements for completing ITAAC in accordance with 10 CFR 52.99(a).

Response to Question 14.02-95:

The COL information item in U.S. EPR FSAR Tier 2, Section 14.2.11 will be revised to add the sentence, "Identify and cross reference each test (or portion thereof) required to be completed before initial fuel loading and that is designed to satisfy the requirements for completing ITAAC." The corresponding COL information item 14.2-2 in U.S. EPR FSAR Tier 2, Table 1.8-2 will be revised to match the information in U.S. EPR FSAR Tier 2, Section 14.2.11.

FSAR Impact:

U.S. EPR FSAR Tier 2, Section 14.2.11 and Table 1.8-2 will be revised as described in the response and indicated on the enclosed markup.

U.S. EPR Final Safety Analysis Report Markups

14.2-95

A COL applicant that references the U.S. EPR certified design will develop a test program that considers the following ~~five-guidance~~ components:

1. The applicant should allow at least nine months to conduct preoperational testing.
2. The applicant should allow at least three months to conduct startup testing, including fuel loading, low-power tests, and power-ascension tests.
3. Plant safety will not be dependent on the performance of untested SSC during any phase of the startup test program.
4. Surveillance test requirements will be completed in accordance with plant Technical Specification requirements for SSC operability before changing plant modes.
5. Overlapping test program schedules (for multiunit sites) should not result in significant divisions of responsibilities or dilutions of the staff provided to implement the test program.
6. The sequential schedule for individual startup tests should establish, insofar as practicable, that test requirements should be completed prior to exceeding 25 percent power for SSC that are relied on to prevent, limit, or mitigate the consequences of postulated accidents.
7. Approved test procedures should be in a form suitable for review by regulatory inspectors at least 60 days prior to their intended use or at least 60 days prior to fuel loading for fuel loading and startup test procedures.

14.2-95

8. Identify and cross reference each test (or portion thereof) required to be completed before initial fuel loading and that is designed to satisfy the requirements for completing ITAAC.

~~The EPR startup schedule is as provided in Figure 14.2-1—U.S. EPR Commissioning Milestones.~~

14.2.12 Individual Test Descriptions

The individual preoperational test abstracts identified in this section contain test descriptions that form one part of the bases for defining the minimum testing requirements.

In these abstracts:

- References to design or design requirements generally mean functional design or functional design requirements. For example, ~~actual~~-SSC may have higher design capacity than what is functionally required.

Table 1.8-2—U.S. EPR Combined License Information Items
Sheet 38 of 44

Item No.	Description	Section	Action Required by COL Applicant	Action Required by COL Holder
<p>14.2-95</p> <p>→</p> <p>14.2-95</p>	<p>A COL applicant that references the U.S. EPR certified design will develop a test program <u>that considers the following five guidance</u> components: 1. The applicant should allow at least 9<u>nine</u> months to conduct preoperational testing. 2. The applicant should allow at least 3<u>three</u> months to conduct startup testing, including fuel loading, low power tests, and power ascension tests. 3. <u>Plant safety will not be dependent on the performance of untested SSC during any phase of the startup test program.</u> 4. <u>Surveillance test requirements will be completed in accordance with plant Technical Specification requirements for SSC operability before changing plant modes.</u> 5. Overlapping test program schedules (for multi-unit sites) should not result in significant divisions of responsibilities or dilutions of the staff provided to implement the test program. 4<u>6</u>. The sequential schedule for individual startup tests should establish, insofar as practicable, that test requirements should be completed prior to exceeding 25 percent power for SSCs<u>SSC</u> that are relied upon to prevent, limit, or mitigate the consequences of postulated accidents. 5<u>7</u>. Approved test procedures should be in a form suitable for review by regulatory inspectors at least 60 days prior to their intended use or at least 60 days prior to fuel loading for fuel loading and startup test procedures. <u>8. Identify and cross reference each test (or portion thereof) required to be completed before initial fuel loading and that is designed to satisfy the requirements for completing ITAAC.</u></p>	14.2.11		Y
14.2-3	A COL Applicant that references the US EPR design certification will provide site-specific information for review and approval of test procedures.	14.2.3	Y	
14.2-4	A COL Applicant that references the US EPR design certification will address the site-specific administrative procedures for review and approval of test results.	14.2.5	Y	