

ArevaEPRDCPEm Resource

From: Pederson Ronda M (AREVA NP INC) [Ronda.Pederson@areva.com]
Sent: Wednesday, June 17, 2009 5:09 PM
To: Tesfaye, Getachew
Cc: BENNETT Kathy A (OFR) (AREVA NP INC); DELANO Karen V (AREVA NP INC); GUCWA Len T (EXT); BEELMAN Ronald J (AREVA NP INC)
Subject: Response to U.S. EPR Design Certification Application RAI No. 221, FSARCh. 6 (Part 1 of 2)
Attachments: RAI 221 Response US EPR DC (Part 1 of 2).pdf

Getachew,

Attached please find AREVA NP Inc.'s response to the subject request for additional information (RAI). The attached file, "RAI 221 Response US EPR DC.pdf" provides technically correct and complete responses to 3 of the 32 questions.

The following table indicates the respective pages in the response document, "RAI 221 Response US EPR DC.pdf," that contain AREVA NP's response to the subject questions.

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A complete answer is not provided for 29 of the 32 questions. The schedule for a technically correct and complete response to these questions is provided below.

Question #	Response Date
RAI 221 — 06.02.01-15	December 17, 2009
RAI 221 — 06.02.01-16	September 30, 2009
RAI 221 — 06.02.01-18	September 30, 2009
RAI 221 — 06.02.01-20	September 30, 2009
RAI 221 — 06.02.01-21	December 17, 2009
RAI 221 — 06.02.01-22	December 17, 2009
RAI 221 — 06.02.01-23	December 17, 2009
RAI 221 — 06.02.01-24	December 17, 2009
RAI 221 — 06.02.01-25	July 31, 2009
RAI 221 — 06.02.01-26	December 17, 2009
RAI 221 — 06.02.01-27	August 27, 2009
RAI 221 — 06.02.01-28	December 17, 2009
RAI 221 — 06.02.01-29	August 27, 2009
RAI 221 — 06.02.01-30	December 17, 2009
RAI 221 — 06.02.01-31	July 31, 2009
RAI 221 — 06.02.01-32	December 17, 2009
RAI 221 — 06.02.01-33	December 17, 2009
RAI 221 — 06.02.01-34	December 17, 2009
RAI 221 — 06.02.01-35	December 17, 2009
RAI 221 — 06.02.01-36	July 31, 2009
RAI 221 — 06.02.01-37	July 31, 2009
RAI 221 — 06.02.01-38c	July 31, 2009
RAI 221 — 06.02.01-39	August 27, 2009
RAI 221 — 06.02.01-40	August 27, 2009
RAI 221 — 06.02.01-41	August 27, 2009
RAI 221 — 06.02.01-42	December 17, 2009
RAI 221 — 06.02.01-43	August 27, 2009
RAI 221 — 06.02.01-44	December 17, 2009
RAI 221 — 06.02.01-46	August 27, 2009

Sincerely,

Ronda Pederson

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Licensing Manager, U.S. EPR Design Certification

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

Sent: Tuesday, May 19, 2009 7:30 PM

To: ZZ-DL-A-USEPR-DL

Cc: Walton Jensen; Christopher Jackson; Jason Carneal; Joseph Colaccino; ArevaEPRDCPEm Resource

Subject: U.S. EPR Design Certification Application RAI No. 221 (2792), FSARCh. 6

Attached please find the subject requests for additional information (RAI). A draft of the RAI was provided to you on April 14, 2009, and on May 15, 2009, you informed us that the RAI is clear with exception of Draft RAI Question 06.02.01-15, Part 33. After further evaluation, the staff has determined that Draft RAI Question 06.02.01-15, Part 33 is unnecessary and it is deleted. Additionally, per your request, RAI 221 has been renumbered to break up the single RAI question with 32 parts into 32 separate questions, i.e. Question 06.02.01-15, Part1-32 are now Questions 06.02.01-15 - Question 06.02.01-46. 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: 583

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Subject: Response to U.S. EPR Design Certification Application RAI No. 221, FSARCh. 6
(Part 1 of 2)
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Response to

Request for Additional Information No. 221

5/19/2009

U. S. EPR Standard Design Certification

AREVA NP Inc.

Docket No. 52-020

SRP Section: 06.02.01 - Containment Functional Design

Application Section: 6.2.1, Technical Report ANP-10299P

**QUESTIONS for Containment and Ventilation Branch 1 (AP1000/EPR Projects)
(SPCV)**

Question 06.02.01-15:

The last paragraph of Section 2.2 on page 2-10 of ANP-10299P states that the convection foils provide the minimum free-flow cross-sectional area needed to mitigate a small break LOCA event. Provide analyses of potential design basis small break LOCA events within the US-EPR containment to justify this conclusion.

Response to Question 06.02.01-15:

A response to this question will be provided by December 17, 2009.

Question 06.02.01-16:

Section 2.2.3 of ANP-10299P describing the mixing dampers states that they open with a differential pressure of plus or minus 35 millibar or an absolute pressure of 1.2 bar. Discuss the redundancy of these sensors and actuation logic.

Response to Question 06.02.01-16:

A response to this question will be provided by September 30, 2009.

Question 06.02.01-17:

In regard to ANP-10299P, the Δp signal to open the mixing dampers is stated to be across the pressure equalization ceiling of the SG compartments. Provide the exact location of this Δp instrumentation. Justify that the dynamic conditions in the broken loop SG compartment will not interfere with the Δp signal in the early stages of blowdown, the time when the dampers need to open.

Response to Question 06.02.01-17:

The location of the differential pressure sensors is currently unknown. Sensor placement will occur later in the design process and in accordance with applicable standards and regulations. GDC 4, for example, requires that components important to safety are designed to accommodate the effects of, and be compatible with, the environmental conditions associated with normal operation, maintenance, testing, and postulated accidents, including loss of coolant accidents (LOCA). The location of the sensors will take this and other guidance into consideration to ensure they function properly.

FSAR Impact:

The U.S. EPR FSAR will not be changed as a result of this question.

Question 06.02.01-18:

In regard to ANP-10299P, for both the differential pressure instrumentation and absolute pressure instrumentation which open the mixing dampers, demonstrate that the actuation sensors as well as associated instrumentation and wiring, are environmentally qualified for the conditions that might occur within a reactor containment following a LOCA or MSLB.

Response to Question 06.02.01-18:

A response to this question will be provided by September 30, 2009.

Question 06.02.01-19:

In relation to ANP-10299P, the dampers can be closed by the operators from the control room. Could any single failure inside containment close the dampers following their actuation? What failure mode could close the dampers? What protection is provided to prevent this failure mode? How long following actuation is the protection provided?

Response to Question 06.02.01-19:

No single failure inside containment can cause the hydrogen mixing dampers (HMDs) to close after they are actuated. Once a signal is received by the protection system to open the HMDs, a failure of the sensors or associated instrumentation will not override the previous signal. The only way the dampers can be closed after opening is by the operator manually resetting the actuation signal.

FSAR Impact:

The U.S. EPR FSAR will not be changed as a result of this question.

Question 06.02.01-20:

Section 2.2 of ANP-10299P describes the CONVECT system which establishes a circulation pattern within the containment building following a high energy piping break. The degree of circulation will depend on the opened areas and the resulting flow losses. Provide the effective open area of the rupture and convection foils and the flow loss coefficients. Discuss how these values were determined.

Response to Question 06.02.01-20:

A response to this question will be provided by September 30, 2009.

Question 06.02.01-21:

Pages 6-117 and 6-118 of ANP-10299P describe doors between the accessible and non-accessible areas of the containment which are safety-related to prevent compartment over-pressurization. On page 6-120 non-safety-related access doors ("failure" junctions) are described. Provide a complete description of both the safety and non-safety related doors. Show their location and describe their operation. Provide analyses showing the effect on containment and compartment pressure if the doors function as designed and if they do not function.

Response to Question 06.02.01-21:

A response to this question will be provided by December 17, 2009.

Question 06.02.01-22:

For the safety-related doors described in ANP-10299P provide justification that the requirements of the Commission's regulations for safety related equipment are met.

Response to Question 06.02.01-22:

A response to this question will be provided by December 17, 2009.

Question 06.02.01-23:

Page 6-117 of ANP-10299P states that there are many safety-related doors in containment to prevent compartment over pressurization. This statement indicates the existence of “closed compartments” within containment. Please list all “closed compartments together with their volume. How are these compartments considered in containment pressure buildup calculations? Are there high energy lines in any of these compartments? If so provide appropriate subcompartment analyses.

Response to Question 06.02.01-23:

A response to this question will be provided by December 17, 2009.

Question 06.02.01-24:

Provide technical specification surveillance requirements which will ensure that the foils and dampers of the CONVECT system and the safety-related doors in ANP-10299P perform their intended safety functions. The NRC staff requested that ITAACs be provided for these components in RAI 104:14-03.2.

Response to Question 06.02.01-24:

A response to this question will be provided by December 17, 2009.

Question 06.02.01-25:

Formation of a panel to identify and rank significant phenomena which might affect the US-EPR containment analysis for the development of a PIRT is discussed in Section 3.4.1 beginning on page 3.21 of ANP-10299P. Identify the individuals who served on the panel and provide their qualifications to serve this function.

Response to Question 06.02.01-25:

A response to this question will be provided by July 31, 2009.

Question 06.02.01-26:

Section 5.3.1.5.6 of ANP-10299P discusses hot leg nozzle bypass and states that during later blowdown and early reflood phases, the thinner core barrel structure is cooled and the gaps grow to their maximum size. It is further stated that during the post-reflood phase the reactor vessel shell will cool and approach the pumped ECCS injection temperature but this may take several hours. The effect of hot leg injection is stated to have the effect of cooling portions of the core barrel faster than the reactor vessel shell and to keep the gaps open longer. Since the effect of hot leg nozzle gaps might have the effect of permitting hot leg injection to drain to the downcomer and thereby not be available for core mixing, provide an evaluation of this phenomenon showing its effect on steam condensation in the reactor vessel during hot leg injection.

Response to Question 06.02.01-26:

A response to this question will be provided by December 17, 2009.

Question 06.02.01-27:

Section 6.1.1 describes assumptions used with RELAP5-BW to calculate core heat transfer. The discussion indicates that departure from nucleate boiling is generally calculated to occur very quickly and that subsequent core cooling is by film boiling, however a return to transition boiling is allowed to enhance heat transfer. For the reflood period RELAP5 predictions for FLECHT-SEASET tests are presented showing good agreement with data for the test facility. Standard Review Plan 6.2.1.3 recommends that nucleate boiling be assumed.

- a. For the US-EPR containment calculation in Section 8 of ANP-10299P using the new EM model, provide the heat transfer coefficient as a function of time that is calculated at the middle of an average core channel and the cladding surface to bulk temperature difference as a function of time. Indicate the mode of heat transfer that is occurring associated with the differential temperature and heat transfer coefficient plots. Discuss the conservatism of the RELAP5 calculated heat transfer compared to the nucleate boiling assumption recommended by the SRP.
- b. During the reflood period provide the core flooding rate as a function of time as indicated by the progress of the quench front for the US-EPR using the new EM model. Based on experimental data show that the heat transfer coefficient calculated for an average core channel location of the EPR is conservative based on test data for the predicted flooding rate.

Response to Question 06.02.01-27:

A response to this question will be provided by August 27, 2009.

Question 06.02.01-28:

For the US-EPR containment calculation in Section 8 of ANP-10299P using the new EM model, provide the heat transfer coefficient as a function of time that is calculated between the reactor vessel shell and the downcomer fluid and the temperature difference to the downcomer fluid as a function of time. Indicate the mode of heat transfer that is occurring associated with the differential temperature and heat transfer coefficient plots. Discuss the conservatism of the RELAP5 calculated heat transfer compared to the nucleate boiling assumption recommended by the SRP.

Response to Question 06.02.01-28:

A response to this question will be provided by December 17, 2009.

Question 06.02.01-29:

Section 6.1.2 describes calculation of the carryout rate fraction (CRF) by RELAP5-BW. RELAP5 predictions of the CRF for FLECHT-SEASET tests are presented showing good agreement with data from the test facility. For the US-EPR containment analyses with the new EM model in ANP-10299P and using the core flooding rate derived in the response to RAI 8.b demonstrate that the CRF for US-EPR is conservative based on the experimental data.

Response to Question 06.02.01-29:

A response to this question will be provided by August 27, 2009.

Question 06.02.01-30:

Section 6.1.3 describes calculation of steam generator heat transfer by RELAP5-BW. Predictions for FLECHT-SEASET tests are presented which show good agreement when the test facility is modeled. The prediction of steam generator heat transfer appears to be a function of the steam and liquid flow rates within the steam generator tubes. For the US-EPR containment analysis with the new EM model in ANP-10299P show that with the predicted steam generator tube flow rates that the heat transfer predicted for the US-EPR is conservative based on comparison to experimental data.

Response to Question 06.02.01-30:

A response to this question will be provided by December 17, 2009.

Question 06.02.01-31:

The text in the paragraph in the middle of page 6-17 of ANP-10299P for timing of steam generator tube quenching does not appear to agree with the times indicated in Figure 6-15 on the same page. Further clarification is needed.

Response to Question 06.02.01-31:

A response to this question will be provided by July 31, 2009.

Question 06.02.01-32:

The table on page 6-30 of ANP-10299P states that fuel cladding swelling and rupture was included in the RELAP5-BW prediction of mass and energy release. SRP 6.2.1.3 recommends that fuel swelling and rupture not be considered for containment mass and energy release calculations. Provide an assessment of the affect of any predicted cladding swelling and rupture on the calculated containment pressure for US-EPR and justify that the inclusion of these models leads to conservative results.

Response to Question 06.02.01-32:

A response to this question will be provided by December 17, 2009.

Question 06.02.01-33:

On October 31, 2008, Areva made a presentation to the NRC staff describing calculation of EPR reactor vessel mixing using the CATHARE 3D computer code. Provide a discussion comparing the reactor vessel mixing results from the CATHARE 3D analyses with the reactor vessel mixing analytical assumptions described in ANP-10299P. What value of $\eta(\text{mix})$ as defined in equation of 6-1 of the report would be predicted by CATHARE 3D? Provide a discussion of the use, validation and acceptance of CATHARE 3D in Europe.

Response to Question 06.02.01-33:

A response to this question will be provided by December 17, 2009.

Question 06.02.01-34:

For the new EM containment M&E model described in Chapter 8 of ANP-10299P, RELAP5-BW is used to calculate the break flow to the containment until the containment loop seals are assumed to fill with water. After the loop seals are assumed to have filled, the GOTHIC code is utilized to calculate the break flow to the containment. Provide justification for the time selected for loop seal closing. Would an earlier time result in a higher containment pressure prediction?

Response to Question 06.02.01-34:

A response to this question will be provided by December 17, 2009.

Question 06.02.01-35:

Section 8.2.3.2 of ANP-10299P describes the removal of the remainder of the steam generator stored energy using the GOTHIC code to model the reactor system. Five percent of the total ECCS flow is assumed to be transferred to the steam generators as liquid.

- a. Provide justification for the assumed liquid carryout. For example, compare this liquid fraction to that calculated by RELAP5 or to that which would be obtained using a two phase level swell model such as the Yeh correlation that is programmed into the GOTHIC code.
- b. Page 8-12 states that the 5% liquid flow is distributed equally among the 4 steam generators. The intact loops are assumed to be blocked with water in the pump suction lines at this time. Discuss the conservatism of the equal distribution assumption compared to the case of all liquid flow traveling to the broken loop steam generator.

Response to Question 06.02.01-35:

A response to this question will be provided by December 17, 2009.

Question 06.02.01-36:

Pages 8-24 through 8-26 of ANP-10299P describe derivation of the hot leg injection mixing model used with the GOTHIC simulation of hot leg injection. The staff understands that these pages are being revised. Provide the revisions and provide a step-wise derivation for the equations that are used in the hot leg injection and mixing model for GOTHIC.

Response to Question 06.02.01-36:

A response to this question will be provided by July 31, 2009.

Question 06.02.01-37:

Figure 9-12 in ANP-10299P presents the long term steam flow to the containment calculated by the GOTHIC reactor system model. The figure shows the steam flow to: 1. drop to almost zero following the initiation of hot leg injection and to partially recover, 2. slowly increase from 5400 seconds to approximately 12000 seconds and 3. suddenly decrease at approximately 12000 seconds. Explain the processes in the GOTHIC model which cause these effects.

Response to Question 06.02.01-37:

A response to this question will be provided by July 31, 2009.

Question 06.02.01-38:

Page 8-23 of ANP-10299P states that the flow split that is assumed between cold leg and hot leg safety injection after hot leg injection is initiated was determined using a piping network analysis.

- a. Provide additional details concerning the network analysis including a description of the computer code that was used and the single failures that were assumed.
- b. Describe the technical specification surveillance and ITAAC requirements that will be established to ensure that the assumed flow split is maintained.
- c. The three components of the ECCS, MHSI pumps, LHSI pumps and accumulators are designed to inject into the RCS at the same time. The three injection lines merge into a single line that leads to the injection nozzle. The accumulators inject first borated water, then nitrogen gas. There must be interference among the competing flows. The applicant performed steady state piping network flow analyses, but no calculations were done with all three components delivering at the same time. How is the transient injection rate established for the various LOCAs considered in containment analysis?

Response to Question 06.02.01-38:

- a. The flow split assumption was based on an *AFT Fathom*TM code calculation of a large break loss of coolant accident (LOCA). The hydraulic resistance for each component was calculated using standard industrial formulations, including Crane and Idel'chik. The pipe resistances were calculated using the Darcy formula and the Moody friction chart. Single failures are not considered in the network analysis but are addressed in the design basis accident analysis.
- b. The strategy of hot leg injection is not credited in the containment analyses of record. Technical specification surveillance and ITAAC requirements for conformance with minimum hot leg injection acceptance criteria will be developed by December 18, 2009, following incorporation of the relevant multi-node GOTHIC containment analyses into U.S. EPR FSAR, Tier 2, Chapter 6.
- c. A response to this question will be provided by July 31, 2009.

FSAR Impact:

The U.S. EPR FSAR will not be changed as a result of this question.

Question 06.02.01-39:

The table starting on page 8-33 and ending on page 8-37 of ANP-10299P discusses assumptions used in the analysis of secondary system pipe ruptures. Items 4 and 6 indicate that liquid entrainment from the break was assumed in the main steam line break analyses. Page 6.2.-21 of the FSAR indicates that during periods when liquid entrainment would be predicted, the break energy is set to that of saturated steam so that there would be no liquid entrainment. The response to RAI 82 #06.02.01.04-1.f further explains how liquid entrainment is prevented by the setting of control variables in RELAP5. FSAR table 6.2.1-22 for MSLB mass and energy release shows no liquid entrainment. If liquid entrainment is assumed, provide the appropriate experimental justifications and break size analyses as recommended in SRP 6.2.1.4.

Response to Question 06.02.01-39:

A response to this question will be provided by August 27, 2009.

Question 06.02.01-40:

Item 4.2.3.2.6 on page 8-36 of ANP-10299P states that for MSLB a drop diameter of 100 microns was used to determine the interface area between the steam and water. The staff does not understand the use of this parameter if no liquid droplets are assumed to be released to the atmosphere as discussed on page 6.2-21 of the FSAR. Provide additional details and justifications for use of the 100 micron parameter.

Response to Question 06.02.01-40:

A response to this question will be provided by August 27, 2009.

Question 06.02.01-41:

The staff understands that Areva takes credit for steam condensation within the reactor coolant cold legs in the RELAP5 BW predictions of mass and energy release for containment evaluation in ANP-10299P. As discussed in Standard Review Plan 6.2.1.3, provide justification for the condensation assumptions by comparing the RELAP5 BW predictions of flow conditions within the US-EPR cold legs with applicable experimental data. Provide these comparisons for both the reflood and post reflood periods.

Response to Question 06.02.01-41:

A response to this question will be provided by August 27, 2009.

Question 06.02.01-42:

FSAR Section 5.2.3.4.3 documents that reflective metal insulation (RMI) will be used to cover the primary and secondary side system components. In Section 8.1.1 of ANP-10299P the energy sources for mass and energy discharge are discussed but RMI is not included. During LBLOCA or MSLB, some of the RMI insulation is expected to be detached so that the sensible heat from this RMI would be directly discharged to the containment while remaining intact RMI would contribute to the heat added to the containment. Provide an assessment of the effect of the addition of RMI sensible heat to the containment peak pressure and temperature following a LBLOCA or MSLB.

Response to Question 06.02.01-42:

A response to this question will be provided by December 17, 2009.

Question 06.02.01-43:

Figure 9-14 in ANP-10299P presents the containment pressure calculated using the new evaluation model for US-EPR. The mass and energy release was calculated using RELAP5-BW for the first 1200 seconds and containment pressures were calculated using a one node GOTHIC containment model. For the first 1200 seconds, this is the same methodology as described in the FSAR which is used to produce FSAR Figure 6.2.2-16. Both analyses are for a postulated double ended break at the suction of a reactor coolant pump, yet different results were obtained for the first 1200 seconds. Describe the changes in models or assumptions which produced the different results.

Response to Question 06.02.01-43:

A response to this question will be provided by August 27, 2009.

Question 06.02.01-44:

During the April 6 and 7 audit at Lynchburg, a discussion of the CONVECT system indicated that the pressurizer compartment is only compartment that remains closed post accident. No foils or dampers are provided to include this compartment in the post accident "one room" containment. Other components in this compartment are the pressurizer relief tank, CVCS tank and heat exchanger, core instrumentation, and at least 2 PARs. Confirm that this compartment remains isolated post accident. This question relates to ANP-10299P.

Response to Question 06.02.01-44:

A response to this question will be provided by December 17, 2009.

Question 06.02.01-45:

During the April 6 and 7 audit at Lynchburg, handout slides were presented indicating post accident convection flow paths in containment. Provide a copy of slides #11 and #17 to support the review of ANP-10299P.

Response to Question 06.02.01-45:

The requested slides, edited to avoid disclosure of building elevations to the public, are provided below.

FSAR Impact:

The U.S. EPR FSAR will not be changed as a result of this question.



CONVECT System Conceptual Performance

