

**From:** Lawrence Rossbach  
**To:** Kathy K. (GE Energy) Sedney  
**Date:** 2/1/2007 2:48:45 PM  
**Subject:** Resending: Comments on RAI 3.9-42 & 122 responses (MFN 06-489)

Resending to correct that 121 is acceptable:

Attached are our comments on GE's response to RAIs 3.9-42 and 3.9-122. These responses were contained in GE letter MFN 06-489. A supplemental response to these two RAIs is requested. Please contact me if you have any questions or would like to arrange a telephone conference to discuss these comments. The response to RAIs 3.9-30, 120, and 121 contained in MFN 06-489 are acceptable.

Thanks, Larry

**CC:** Amy Cubbage; Arnold Lee; David.hinds@ge.com; david.piepmeyer@ge.com; George B. (GE Infra Energy) Stramback; [jim.kinsey@ge.com](mailto:jim.kinsey@ge.com)

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**RAI 3.9-42 (MFN 06-489)**

The staff requested the applicant to provide all relevant codes and standards, including pertinent editions, for all equipment qualification covered under DCD Tier 2, Subsection 3.9.2.2.2. The staff also requested the applicant to explain how these codes and standards are used for the plant-specific qualification. In its response dated November 30, 2006, the applicant stated that the codes and standards that are applicable to equipment identified in Subsection 3.9.2.2.2 are specified in Table 3.2-1, and the applicable ASME Code edition and addenda are shown in Table 1.9-22. The applicant stated that the testing and/or analysis records for all ASME mechanical equipment that is required to meet seismic Category I equipment qualification requirements will be available for staff review when the equipment is ready for delivery.

The staff found the applicants commitment to make available the testing and/or analysis records of equipment qualification for staff audit is acceptable. However, the applicant should include this commitment in its revised DCD as a COL action item.

The staff also found the applicants response on the codes and standards to be inadequate. Although some mechanical equipment items are qualified solely by design/analysis, in accordance with industry standards such as ASME Code Section III, there are others which may be qualified by tests or a combination of tests and analyses. The applicant is requested to identify all relevant mechanical equipment items for which tests are involved in their qualification. And, for such equipment items, the applicant is requested to identify the standards (such as IEEE 344), with the editions, which will be used for the seismic and dynamic qualification. The applicant is also requested to provide a summary description of how the qualification will be performed for each of these equipment items.

This RAI is still open.

**RAI 3.9-122 (MFN 06-489)**

The staff requested that COL holders provide the following snubber surveillance information in Section 3.9.9 of DCD, as part of COL action items: (1) the scope of snubber in-service examination program, including the codes and standards used; (2) the scope of snubber in-service testing program, including the codes and standards used; and (3) a detailed discussion on the accessibility provisions for maintenance, in-service examination and testing, and possible repair or replacement of snubbers consistent with the requirements of SRP Section 3.9.3. In its response dated November 30, 2006, the applicant stated that DCD Tier 2, Subsection 3.9.9 will be revised to require that COL holder provide a plan for the detailed snubber in-service testing and inspection program in accordance with the ASME OM Code. This plan includes baseline pre-service testing to support the periodic in-service testing of all snubbers covered by the plant-specific technical specifications.

The staff finds the applicants response to be adequate in addressing the staffs concerns on snubber in-service examination and in-service testing. However, the applicant has not addressed the staffs concern identified in Item (3) of the RAI, regarding the accessibility provisions for maintenance, in-service examination and testing, and possible repair or replacement of snubbers.

This RAI is still open .