

From: Lawrence Rossbach
To: Kathy K. (GE Energy) Sedney
Date: 2/15/2007 8:39:01 AM
Subject: Comments on response to RAIs 3.9-7 and 3.9-103

We have the following comment on GE's response in MFN 06-464 to RAI 3.9-7:

The response didn't provide the information needed. RAI 3.9-7 requested a discussion of the basis of the Dynamic Loading Events listed in Table 3.9-1. By this we mean, why were these transients chosen and no others. Were they chosen from previous experience, or were they postulated because this is a new design, or both? In fact, were all transients that could impact the plant postulated? If this has been answered somewhere else, please provide a reference to the particular section.

We have the following comment on GE's response in MFN 06-519 to RAI 3.9-103:

This RAI requested that GE "Provide confirmation that safety related components and component supports required to remain operational and to perform a safety function after a specified plant condition event are designed to lower ASME Section III service level stress criteria."

The GE response stated that "It is confirmed that safety related components and component supports required to remain operational and to perform a safety function after a specified plant condition event are designed to the appropriate ASME Code Section III service level stress criteria." It isn't clear what GE means by "appropriate" and the basis for deciding what's appropriate was not stated. We request that you tell us that the appropriate stress criteria for these components and supports are indeed lower than those corresponding to the plant event. As an example, a valve that is required to be active during and after an SSE or other faulted condition event should be designed to Service Level C or Service level B criteria. The allowable stresses for these service levels are smaller than the Service Level D allowable stress; a valve that is not required to operate during and after a faulted event would be designed to the Service Level D allowable stress. If this has been addressed somewhere else, please provide a reference to the particular section.

Please contact me if you have any questions or would like to arrange a telephone conference to discuss these comments.

Thanks, Larry

CC: Amy Cabbage; David.hinds@ge.com; david.piepmeyer@ge.com; George B. (GE Infra Energy) Stramback; jim.kinsey@ge.com; Mark Hartzman

Mail Envelope Properties (45D46275.370 : 20 : 35118)

Subject: Comments on response to RAIs 3.9-7 and 3.9-103
Creation Date 2/15/2007 8:39:01 AM
From: Lawrence Rossbach
Created By: LWR@nrc.gov

Recipients	Action	Date & Time
-------------------	---------------	------------------------

ge.com Transferred 2/15/2007 8:39:31
 AM
 david.hinds CC (David.hinds@ge.com)
 david.piepmeyer CC (david.piepmeyer@ge.com)
 george.stramback CC (George B. (GE Infra Energy) Stramback)
 jim.kinsey CC (jim.kinsey@ge.com)

gene.GE.com Transferred 2/15/2007 8:39:31
 AM
 kathy.sedney (Kathy K. (GE Energy) Sedney)

nrc.gov
 OWGWPO03.HQGWDO01 Delivered 2/15/2007 8:39:10
 AM
 AEC CC (Amy Cabbage) Opened 2/15/2007 8:39:38
 AM

nrc.gov
 OWGWPO04.HQGWDO01 Delivered 2/15/2007 8:39:08
 AM
 MXH CC (Mark Hartzman) Opened 2/21/2007 3:32:25
 PM

Post Office	Delivered	Route
		ge.com
		gene.GE.com
OWGWPO03.HQGWDO01	2/15/2007 8:39:10 AM	nrc.gov
OWGWPO04.HQGWDO01	2/15/2007 8:39:08 AM	nrc.gov

Files	Size	Date & Time
MESSAGE	3002	2/15/2007 8:39:01 AM

Options

Auto Delete:	No
Expiration Date:	None
Notify Recipients:	Yes
Priority:	Standard
ReplyRequested:	No
Return Notification:	None

Concealed Subject:	No
Security:	Standard

To Be Delivered:	Immediate
Status Tracking:	Delivered & Opened