

**From:** Lawrence Rossbach  
**To:** Kathy K. (GE Energy) Sedney  
**Date:** 3/6/2007 1:23:15 PM  
**Subject:** Comments on RAI 3.2-16 and 21 responses (MFN 06-308)

On 11/20/2006 we sent several comments to you on the section 3.2 RAI responses in MFN 06-308. Since then we have identified additional comments on the 3.2 RAI responses in MFN 06-308. Our comments on the responses to RAIs 3.2-16 and 21 are attached. In addition I want to point out that the concern over endorsement of ANS 58.14 described in item 3.2-3b of our 11/20/2006 comments is also applicable to Quality Group C and Safety Class 3 and non-pressure retaining fuel and fuel channels. This completes our comments on MFN 06-308.

Please contact me (301-415-2863) or Chandu Patel (301-415-3025) if you have any questions or would like to arrange a telephone conference to discuss these comments.

Thanks, Larry

**CC:** Amy Cubbage; Chandu Patel; David.hinds@ge.com; david.piepmeyer@ge.com; George B. (GE Infra Energy) Stramback; jim.kinsey@ge.com; Richard McNally

**Mail Envelope Properties** (45EDB193.EAD : 20 : 35118)

**Subject:** Comments on RAI 3.2-16 and 21 responses (MFN 06-308)  
**Creation Date** 3/6/2007 1:23:15 PM  
**From:** Lawrence Rossbach  
**Created By:** LWR@nrc.gov

<b>Recipients</b>	<b>Action</b>	<b>Date &amp; Time</b>
ge.com	Transferred	3/6/2007 1:23:49 PM
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	3/6/2007 1:23:49 PM
kathy.sedney (Kathy K. (GE Energy) Sedney)		
nrc.gov		
OWGWPO03.HQGWD001	Delivered	3/6/2007 1:23:19 PM
AEC CC (Amy Cubbage)	Opened	3/6/2007 7:27:22 PM
nrc.gov		
TWGWPO01.HQGWD001	Delivered	3/6/2007 1:23:19 PM
RWM4 CC (Richard McNally)	Opened	3/6/2007 1:51:37 PM
nrc.gov		

TWGWPO03.HQGWDO01  
CPP CC (Chandu Patel)  
AM

Delivered 3/6/2007 1:23:15 PM  
Opened 3/15/2007 8:13:33

**Post Office**

**Delivered**

**Route**

OWGWPO03.HQGWDO01  
TWGWPO01.HQGWDO01  
TWGWPO03.HQGWDO01

3/6/2007 1:23:19 PM nrc.gov  
3/6/2007 1:23:19 PM nrc.gov  
3/6/2007 1:23:15 PM nrc.gov

ge.com  
gene.GE.com

**Files**  
MESSAGE  
030607 3.2 RAI response Comments.pdf  
PM

**Size**  
1119

**Date & Time**  
3/6/2007 1:23:15 PM  
7259 3/6/2007 12:32:06

**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

Comments on ESBWR Section 3.2 RAI responses as contained in GE letter MFN 06-308

Comment on response to RAI 3.2-16: DCD Tier 2, Revision 3, Table 1.9-21b identifies that there are no exceptions to Regulatory Guide (RG) 1.29, Rev. 3. DCD Tier 2, Revision 3, Section 3.2.1 also identifies that the seismic classifications indicated in Table 3.2-1 are consistent with the guidelines of Regulatory Guide 1.29. Regulatory Position C.1.e in RG 1.29 identifies the portions of steam systems in boiling-water reactors from the containment isolation valves up to but not including the turbine stop valve and connected piping of a nominal size 2.5 inches and larger up to the first valve that is either normally closed or capable of automatic closure as Seismic Category I. However, Table 3.2-1 and Figure 3.2-1 for the N11 Turbine Main Steam System submitted in response to RAI 3.2-16 identifies the Turbine Main Steam System piping from the seismic interface restraint to the turbine stop valves and the connected branch lines equal to or larger than 2.5 inches as Seismic Category II. This seismic classification is basically consistent with Standard Review Plans (SRPs) 3.2.1 and 3.2.2 that, as an alternative to RG 1.29, considers it acceptable to classify these lines as nonsafety-related and non-seismic Category I, but analyzed using a dynamic seismic analysis method to demonstrate structural integrity under SSE loading conditions. Therefore, it is requested that GE clarify in DCD Tier 2 Table 1.9-21b and Section 3.2.1 that this alternate classification, that is consistent with SRPs 3.2.1 and 3.2.2, represents an exception to RG 1.29.

Comment on response to RAI 3.2-21: The response to RAI 3.2-21 identified that the hydraulic control unit (HCU) classifications have been well established and accepted for many decades for both the entire BWR operating fleet and the ABWR certified design. GE believes that the same classification is appropriate for the ESBWR and is consistent with industry practice. The staff concurs that the HCU classification has been standard industry practice that has been accepted by the NRC and no change in classification is required, but this industry practice should be specifically identified as an exception to RG 1.26 in DCD Tier 2 Section 1.9. GE is requested to clarify in DCD Tier 2 Table 1.9-21b that this represents an exception to RG 1.26.