

From: "Pederson Ronda M (AREVA NP INC)" <Ronda.Pederson@areva.com>
To: "Getachew Tesfaye" <GXT2@nrc.gov>
Date: 11/21/2007 9:33:29 AM
Subject: ANP-10275P DSER comments

Getachew,

Attached are AREVA NP's comments on the DSER. I forgot to send these out Monday before I left.

Please contact me if you have any questions.

Thank you,

Ronda Pederson

ronda.pederson@areva.com

New Plants Deployment

AREVA NP, Inc.

An AREVA and Siemens company

3315 Old Forest Road

Lynchburg, VA 24506-0935

Phone: 434-832-3694

Cell: 434-841-8788

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Created By: Ronda.Pederson@areva.com

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GXT2 (Getachew Tesfaye)

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**AREVA NP Comments on Draft SER for ANP-10275P,
“U.S. EPR Instrument Setpoint Methodology Topical Report”**

1. Page 1, Section 1.0: ANSI/ISA-67.04.01-2000 has been revised. AREVA NP requests a revision to the DSER since AREVA NP is using the latest revision to the standard which is ANSI/ISA-67.04.01-2006.
2. Page 1, Section 1.0: AREVA NP is using the guidance provided in RIS 2006-17 in addition to Regulatory Guide 1.105 to comply with the latest industry and NRC concerns regarding performance test acceptance criteria.
3. Page 3, Section 3.0: ANP-10275P does not make the statements currently shown in the DSER. AREVA NP requests that Items I, II, and III be re-written to summarize the treatment of random, dependant, and bias terms as stated in Section 2.1.3 of ANP-10275P.

AREVA NP requests replacing the DSER statements in Items I, II, and III after “The CU calculation is based on the following” with:

- I. “Random uncertainties are eligible for the SRSS combination propagated from the process measurement module through the signal conditioning module of the instrument channel to the device that initiates the actuation.”
 - II. “Dependent uncertainties are combined algebraically to create a larger independent uncertainty that is eligible for SRSS combination.”
 - III. “Bias uncertainties are those that consistently have the same algebraic sign. If they are predictable for a given set of conditions because of a known positive or negative direction, they are classified as bias with a known sign. If they do not have a known sign, they are treated conservatively by algebraically adding the bias in the worst direction. These are classified as bias with an unknown sign.”
4. Page 3, Section 3.0: AREVA NP requests rewording the second to last paragraph as follows to remove terms that are not used by AREVA NP and add terms used in ANP-10275P to comply with ANSI/ISA-67.04.01-2006 and RIS 2006-17:

The CU value is established at a 95 percent probability and a 95 percent confidence level, which are consistent with the requirement of RG 1.105. This CU value is compared with the analytical limit (AL) for determination of the limiting trip setpoint (LTSP). The nominal trip setpoint (NTSP) is established by adding margin to the CU. The vendor provides acceptable commitment that the margin is large enough for AV assurance that the purpose of the AV is still satisfied by providing a large enough allowance to account for those uncertainties not measured during the test. Having determined the AL and CU, the LTSP can be calculated by subtracting (adding) CU from (to) AL, depending on the direction of process variable change when approaching the AL.

5. Page 3, Section 3.0: AREVA NP requests the following rewording change to the beginning of the last paragraph for clarification.

The "as-left" value is established by the required accuracy band (calibration accuracy) that a device or instrument channel must be calibrated to the NTSP within during surveillance. The "as-left" condition is the state which the instrument channel is left after calibration or trip setpoint verification. Additionally, if the "as-found" value is within the "as-left" tolerance then re-calibration is not required. The AVs are set equal to the Performance Test Acceptance Criteria, referred to as the "as-found" tolerance in the EPR instrument setpoint methodology. The AV defines the maximum possible value at which the analytical limit is protected. These...

6. Page 3, Section 3.0: AREVA NP requests replacing "calibrated" with "perform" and adding the following sentence "The digital protection system modules (DPS) cannot be calibrated; therefore, the "as found" and "as-left" tolerance are equal" to the last paragraph.

AREVA's digital protection system cannot be calibrated; therefore, the "capability of the racks to be *calibrated* within these tolerances" needs to be replaced with the "capability of the racks to *perform* within these tolerances".

7. Page 3, Section 3.0: AREVA NP requests deleting "as the AVs along with the NTSP" in the last paragraph.

It is the intent of AREVA's technical specifications to use "LTSP", not "AV or NTSP". AREVA NP prefers not to provide technical specifications details in ANP-10275P.