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Subject: Bellefonte acceptance review tracking table

Attached is the Bellefonte acceptance review tracking table that was used by the staff to track interactions with the Tennessee Valley authority. The table consists of a description of the items and the phone call interactions that were held to determine if the item would rise to the level that it would prevent docketing of the application.

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Bellefonte Acceptance Review Tracking Table

Number	Issue Summary	Acceptance	COLA section	PM/BC / Reviewer	Call Date	Status
1	<p>Quality assurance – the application, chapter 17, identifies that the NuStart and West QA plans are being used to address the application quality until the chapter 17.5 construction related QA program is put in place after the COL is issued – the application doesn't identify the TVA QA plan as being controlling QA program during the period that the app is being processed (e.g. RAI responses).</p> <p>Since TVA is the applicant, the TVA QA plan should be the controlling QA program in the application.</p>	Y	17.1 17.5	Joelle Starefos Juan Peralta Kerri Kavanagh	11/19/07 11/21/07 12/11/07 12/13/07 1/3/08	<p>11/19/07 – Starefos discussed issue with TVA (Phil Ray) during two phone calls.</p> <p>11/21/07 – TVA (Phil Ray, Jim Chardos), NuStart (Rich Grumbier), and NRC (Kavanagh, Starefos) discussed issue; action with TVA to propose resolution / response</p> <p>11/27/07 – TVA indicated that they don't think that an App B QA plan is required for application preparation. NRC & TVA action to prepare for future telecom.</p> <p>12/11/07 – Phone conference with Phil Ray, Steve France, Eddie Brock, Rich Grumbier, Peter Hastings, Jim Cassidy, Joe Sebrosky, Juan Peralta, Kerri Kavanagh, Matthew Loftus, Ann Hodgdon, Milton Concepcion-Robles, and Tanya Simms. QA concerns were reiterated siting regulation 52.79 (a)(25) as a basis. The staff informed TVA that they did not identify TVA's QA plan as a reference and a supplemental statement can be provided to address this issue. TVA agreed to supply a supplemental statement in the form of a letter stating that 17.1 will be revised in accordance with criteria 1 Appendix B of Part 50 as the basis for their answer. As well as referencing TVA's QA in a revision of the application.</p> <p>12/13/07 – Clarified that letter will be submitted by TVA near the first week of January.</p> <p>01/3/08 – Phone call held with Phil Ray, Jim Chardos, Peter Hastings, Rich Grumbier, Andrea Sterdis, Eddie Grant, Kelly Coke, David Salmon, Neil Haggerty, Stephanie Coffin, Brian Anderson, and Tanya Simms. TVA will submit letter by January 7, 2008.</p>
2	<p>The letter references Appendix D to 10 CFR 52 and AP1000 DCD Rev. 16. The applicant should select which AP1000 version it would like to make reference to and adjust letter to reflect this.</p> <p>This application is not in compliance with Section IV, Additional Requirements and Restrictions of Appendix D to 10 CFR 52 in that all required information was not provided and/or exemptions were not requested.</p>	N	Letter	Joelle Starefos Stephanie Coffin Joelle Starefos	11/20/07	11/20/07 - Starefos discussed issue with TVA (Phil Ray) during phone call.
3	The list of references on page A3-5 of the applicant's proposed onsite emergency plan includes a conceptual design study for the	N	EP A3-5	Brian Anderson Dan Barss	11/26/07	11/26/07 – Starefos left voice message for TVA (Phil Ray) regarding question.

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	proposed siren system. This reference was not included with the application. The review of this topic is within FEMA's jurisdiction.			Nathan Sanfilippo	11/27/07	<p>11/27/07 – Starefos, TVA (Phil Ray) discussed – TVA action.</p> <p>12/7/07 – Internal meeting with NSIR, OGC. NSIR to call FEMA to assess impact. FEMA letter expected 12/12.</p> <p>12/12/07 – FEMA letter expected 12/13. 12/14 – FEMA letter received 12/13 with no discussion of the conceptual design study reference.</p> <p>12/20 – At this time, the staff has determined that no more information is currently needed in this area in order to make an acceptance determination.</p>
4	Two seismic issues: (1) EPRI hazard curve (Dames & Moore) issue (2) East Tennessee Seismic Zone issue. Both issues identified in Vogtle application – current RAs 2.5.2-1 and 2.5.2-3. Potential baseline schedule impact.	N		Tanya Simms Becky Karas Laurel Bauer	11/27/07 11/29/07 12/5/07 12/13/07 12/19/07	<p>11/27/07 – Starefos, TVA (Phil Ray) discussed – TVA action.</p> <p>11/29/07 - Conference call w/Phil Ray, Joelle Starefos, Jan Mazza, Tanya Simms, and Becky Karas. Becky explained concern in intricate detail to Phil, to ensure TVA understands the issue and the possible impact on extending the baseline schedule.</p> <p>12/5/07 – Conference call with TVA, NuStart, NEI, SCE&G, Southern Nuclear, Duke Energy, William Lettis & Associates, Inc, Bechtel, and NRC. Becky Karas provided an explanation of the acceptance review process. She provided and explanation of the seismic zone. Becky also explained that the approach that Bellefonte is taking is consistent with the approach of Vogtle. As a result, the NRC anticipates some of the issues and is trying to address the concerns at this time to determine any risk to the schedule. The NRC foresees more than one round of RAs to resolve this issue. An audit may need to take place. Becky will determine when this will take place. TVA will provide a detailed aspect of the literature that was used to draw to the conclusion that an update of the EPRI hazard curve was not needed.</p> <p>12/13/07 – Clarified that TVA will provide a description of the literature used to draw conclusion of position.</p> <p>12/19/07 – Conference call held with TVA (Ray, Grant), Nustart (Hastings, Redwanz) and NRC (Anderson, Karas, Tappert, Bauer, Li). TVA identified specific sections of FSAR and the list of references that were used to draw the conclusion that an update of the EPRI hazard curve was not needed. TVA emphasized that all of this information has</p>

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9	In section 2.2.3.1 of the SAR there appears to be two problems related to insufficient data related to chemical analyses: 1) regarding flammable vapor clouds there is insufficient data on chemicals analyzed, amounts and release rates, and 2) regarding toxic chemicals there is insufficient data and analyses and there is a conclusion that only chlorine needs to be addressed for control room habitability that the data does not appear to support. This issue is related to item 8 above	N	2.2.3.1	Joe Sebrosky Seshagiri Tammara Charles Cox		See status for item 8 above
10	Several probability analyses associated with the hazard review appear to have insufficient data for the staff to perform a confirmatory review. The probability analyses are as follows: 1) explosion due to barge (2.2.3.1 of the SAR), 2) site proximity missiles (3.5.1.5 of the SAR), 3) aircraft hazards – federal airways, holding patterns, or approach patterns within 2 miles of the plant (3.5.1.6 of the SAR), and 4) aircraft hazards – hazards that may result in structural damage or involving fire (3.5.1.6 of the SAR).	N	2.2.3.1 3.5.1.5 3.5.1.6	Joe Sebrosky Seshagiri Tammara Charles Cox		See status for item 8 above
11	State and local letters of certification of emergency response plans do not appear to have been included with the application as required in 52.79, which refers to 50.33.g	N	EP	Brian Anderson Dan Barss Nathan Sanfilippo		Starefos left voicemail message for TVA (Phil Ray) 12/7 – Anderson to follow up week of 12/10. 12/12/07 – Call with TVA (Phil Ray). Request for copies of letters sent to states. Expect letters before 12/22; TVA to submit letters soon thereafter. 12/18/07 – TVA has one letter; awaiting the second. 12/19/07 – TVA has letters for GA and TN. TVA intends to submit these letters with the next revision to the RCOL application, tentatively scheduled for the week of Jan 1st.
12	Groundwater issue: The staff needs a better understanding of how section 2.4.12 and 2.4.13 of the FSAR were developed. These sections do not appear to be consistent with Section 2.5 of the SAR. Section 2.5 of the SAR notes that there are many large voids in the upper weathered part of the bedrock (epikarst). This would lead the staff to believe that any liquid release may travel much more rapidly than assumed in Section 2.4.12 and 2.4.13 of the SAR. The staff would also like clarification on the assumptions made regarding the risk from liquid when it reaches Town Creek.	N	2.4.12 2.4.13	Joe Sebrosky Chis Cook, Mark McBride	12/11/07	12/11/07 – Phone call held with TVA (Phillip Ray, Penny Selman, and Perry Maddux), NuStart (Randal Lantz, Neil Haggerty, Richard Grumbir, Mike Huba, Eddie Grant, Rick Eiley, Peter Hastings, Jerry Williams, and Fred Redwanz), and NRC (Christopher Cook, Mark McBride, and Joe Sebrosky). TVA explained the basis for the assumptions in 2.4.12, and 2.4.13 of the application and the information regarding the voids in section 2.5 of the application. TVA also discussed the assumptions associated with the risk from liquid when it reached Town Creek. The staff indicated that it would most likely ask requests for additional information in these areas and that it had collected enough information to make its

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						determination that this was most likely not an acceptance review issue. 12/20 – At this time, the staff has determined that no more information is currently needed in this area in order to make an acceptance determination.
13	The staff would like to know when the resolution schedule from TVA will be submitted to address the I&C DAC issues. From what the staff has seen in thus far, TVA has not included the necessary design detail to resolve I&C DAC or provided a schedule as to when the information would be available.		RG 1.206 - C.III.5.1	Tanya Simms Terry Jackson William Roggenbrodt	12/12/07	12/11/07 - Phone conference scheduled for 12/12/07 at 10:30am 12/12/07 – Conference call with Eddie Grant, Andrea Sterdis, Mike Cuba, Phil Ray, Terry Jackson, William Roggenbrodt, and Tanya Simms. TVA was made aware of the concern regarding the lack of a schedule detailing information in the areas where DAC is used. Andrea stated that Westinghouse would be providing a schedule no later than the February 2008 meeting with NRC that covers the ITAAC for DAC which would close this concern at this time for TVA. 12/20 – At this time, the staff has determined that no more information is currently needed in this area in order to make an acceptance determination.
14	The COLA incorporates by reference Section 5.4 "COMPONENT AND SUBSYSTEM DESIGN" which includes subsection 5.4.1 "Reactor Coolant Pump Assembly" of the AP1000 DCD, Revision 16. AP1000 DCD, Revision 16, Section 5.4.1.2.1 "Design Description" states that the reactor coolant pump is a single stage, high-inertia, centrifugal sealess pump of either canned-motor or wet winding design. For Bellefonte, the COL applicant should identify the specific reactor coolant pump design (e.g., canned-motor or wet-winding design) and provide the appropriate flywheel structural analysis for that pump design. It should be noted that in conjunction with the staff's review of Revision 16 of AP1000 DCD, Section 5.4.1.3.6.3, Westinghouse already provided an analysis (Curtis Wright Electro-Mechanical Corporation Report APP1000 RCP-06-009-P) of the flywheel for a canned motor pump design.		5.4.1	Joe Sebrosky David Terao John Honcharik		12/19 – The staff has determined that this issue is best resolved through the AP1000 review and not the Bellefonte review. 12/20 – At this time, the staff has determined that no more information is currently needed in this area in order to make an acceptance determination.
15	In Section 3.9.6, Inservice Testing of Pumps and Valves, proposed Revision 16 of the AP1000 DCD did not revise the COL Information Item on the development of the inservice testing (IST) program and continues to state that the COL applicant will develop an IST program. However, the Bellefonte COLA does not provide an IST program nor does it fully describe an IST program. Similarly, in Section 3.11, Environmental Qualification of Mechanical and Electrical Equipment, proposed Revision 16 of the AP1000 DCD removes	N	3.9.6 3.11	Tanya Simms David Terao Tom Scarbrough	12/19/07	12/19 – Phone call held with TVA (Phillip Ray), and NuStart (AL Schneider, Tom Hicks, Fred Redwanz) and NRC (David Terao, Tom Scarbrough, and Joe Sebrosky). Staff provided a discussion of where the application was lacking information in the IST and EQ area. Staff referred to the Reg Guide 1.206. TVA indicated it would discuss the issue internally and then get back to the staff. TVA action to get back to the staff.

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	<p>references to actions by the COL applicant. Commission paper SECY 05-0197 indicates that COL applicants are expected to fully describe their operational programs. Therefore, the Bellefonte COLA is not consistent with the Commission guidance on operational programs. The resolution of the staff concerns with the proposed revision to Sections 3.9.6 and 3.11 regarding operational programs might require more than one round of RAs and more time for preparation of the safety evaluation report than currently anticipated in the schedule.</p>				<p>12/27/07</p> <p>1/4/08</p>	<p>12/27/07 – Phone call was held with Phil Ray, Jim Chardos, Neil Haggerty, Peter Hasting, Eddie Grant, Stephanie Coffin and Tanya Simms. TVA indicated that they would need more specific information from the NRC staff. TVA feels that the information available in the DCD and the COLA cover the description necessary to resolve this issue. A phone conference will be scheduled to include TVA's IST staff to discuss the information provided.</p> <p>1/4/08 - Phone call was held with Phil Ray, Eddie Grant, Fred Redwanz, Peter Hastings, Richard Grumbir, Andrea Sterdis, Don Linden, Al Snyder, Eben Burns, David Terao, Stephanie Coffin, Thomas Scarbrough, and Tanya Simms. The staff reiterated the issue and explained what the NRC looks for in acceptance space and what is expected in licensing space. This is not an issue in the acceptance review space, but there will need to be at least one round of RAs in licensing space to resolve this concern. The NRC indicated there was a public meeting August 8, 2007 with examples of IST. Since the DCD uses language that is general, non-intrusive techniques are not discussed with adequate detail. After the NRC explained our position, Westinghouse suggested that a public meeting be set that would provide more clarity on the approach.</p> <p>1/7/08 – At this time, the staff has determined that no more information is currently needed in this area in order to make an acceptance determination.</p>
16	<p>Regarding the Tsunami analysis, the report does not consider additional sources cited in a recent USGS report for source generator characteristics and tsunami water levels</p>	N	2.4.6	<p>Joe Sebrosky</p> <p>Mark Thaggard</p> <p>Henry Jones</p>	<p>12/27/07</p> <p>1/3/08</p>	<p>12/27/07 – Phone call was held with Phil Ray, Jim Chardos, Neil Haggerty, Peter Hasting, Eddie Grant, Stephanie Coffin and Tanya Simms. TVA would like to know what reference was used to draw this conclusion. They would like to know if there was a risk issued indicating the additional information that is needed. They are also asking for information on how this information can be made available?</p> <p>01/3/08 – Phone call held with Phil Ray, Jim Chardos, Peter Hastings, Rich Grumbir, Andrea Sterdis, Eddie Grant, Kelly Coke, David Salmon, Neil Haggerty, Stephanie Coffin, Brian Anderson, and Tanya Simms. TVA read the USGS report noted by the staff titled "The Current State of Knowledge Regarding Potential Tsunami Sources Affecting U.S. Atlantic and Gulf Coasts: A report to the Nuclear Regulatory Commission by Atlantic and</p>

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						<p>Gulf of Mexico Tsunami Hazard Assessment Group (April 2007)." TVA does not see how this correlates with NRCs position because the site is on a mountain range. A phone conference will need to set to develop a solution outside of RAs.</p> <p>01/3/08 – Phone call held with Phil Ray, Peter Hastings, Eddie Grant, Fred Redwanz, Henry Jones, Chris Cook, Mark Thaggard, Joelle Starefos, Hosoung Ahn, and Tanya Simms. The NRC stated that 2.4.6 looks for local sources that were not addressed by TVA. RG 1.206 discussed the disparity in elevation related to landslides. TVA stated that these issues have been addressed in various parts of the application. The last paragraph of 2.4.2.1 discusses landslides. No historical data exist related to re-plotting from landslides subsection 2.4.9 addresses this position. The second paragraph of 2.4.2.2 provides specific results from the tsunami analysis such as the inland location and how elevation is addressed. A basis of their position can be found in figures 2.4.1-201 and 2.4.1-202. Section 2.5.5 provides the bulk of the information necessary to address the geological position.</p> <p>1/7/08 – At this time, the staff has determined that no more information is currently needed in this area in order to make an acceptance determination.</p>
17	Bellefonte has not provided plant and site-specific information related to the plan for development and implementation of operating and administrative procedures	N	13.5	Joelle Starefos Michael Junge Richard Pelton	12/27/07	<p>12/27/07 – Phone call was held with Phil Ray, Jim Chardos, Neil Haggerty, Peter Hasting, Eddie Grant, Stephanie Coffin and Tanya Simms. TVA feels they have addressed the operating and administrative procedures through Westinghouse TR 70. The staff's position is based on the SRP which ask for specific information of the applicants procedures. The use of Westinghouse's procedure is a good start. RAs will be used to complete this issue.</p> <p>1/7/08 – At this time, the staff has determined that no more information is currently needed in this area in order to make an acceptance determination.</p>
18	Section 18 is not complete in that Bellefonte has not given details on the current status of the human factors engineering program and control room design	N	18	Joelle Starefos Michael Junge James Bongarra	12/27/07	<p>12/27/07 – Phone call was held with Phil Ray, Jim Chardos, Neil Haggerty, Peter Hasting, Eddie Grant, Stephanie Coffin and Tanya Simms. TVA feels this has been addressed through IBR of Westinghouse TRs. If more information is required please let TVA know.</p>
19	Regarding bracketed information in the technical specifications, the applicant has	N	16	Joelle Starefos	12/27/07	<p>12/27/07 – Phone call was held with Phil Ray, Jim Chardos, Neil Haggerty, Peter</p>

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	proposed to require the COL holder, by license condition, to provide the information prior to fuel load. The COL applicants should submit a schedule for removing each of the brackets, so that impacts on the proposed schedule can be determined. Bracketed information can be considered to be open in few cases if the following criteria are met: 1) the information is closely associated with the closure of design acceptance criteria, and 2) methodologies or analyses included in the DCD or COLA associated with bracketed information explicitly requires as-built information to be calculated.			Michael Marshall Bob Tjader	1/3/08	Hasting, Eddie Grant, Stephanie Coffin and Tanya Simms. TVA is aware of the issue and has stated that the schedule will be provided prior to fuel load and post COL issuance. TVA is still running test and will view this issue again. If this statement is not acceptable they are willing to discuss this further. The NRC staff would like to have a schedule that indicates how this will be handled in COL space for issues that are not DAC related. A phone conference will need to be scheduled. 1/3/08 – Phone call was held with Phil Ray, Fred Redwanz, Andrea Sterdis, Peter Hasting, Eddie Grant, Chuck Brockett, Dana Dority, Bob Tjader, Michael Marshall, and Tanya Simms. Westinghouse feels sufficient information has been provided and will provide a schedule in March which will incorporate a revision to 74A and provide information for any remaining bracketed items that currently exist related to the standard design in the DCD. Westinghouse will contact Bill Gleaves if the schedule can be submitted earlier. The NRC can look at formulating license conditions to deal with DAC.
20	Review dependency identified in that the staff's review of the Bellefonte COLA depends on the staff's review and approval of three NEI draft topical reports: NEI 07-11, "Generic FSAR Template Guidance for Cost-Benefits Analysis for Radwaste Systems for Light-Water-Cooled Nuclear Power Reactors," NEI 07-09, "Generic FSAR Template Guidance for Offsite Dose Calculation Manual," and NEI 07-10, "Generic FSAR Template Guidance for Process Control Program Description."	N	11.2 11.3 11.4	Joelle Starefos Tim Frye Steven Schaffer		12/21/07 – Review dependency identified to TVA. Based on discussions with Phil Ray no additional phone calls needed.
21	Review dependency identified in that the staff's review of the Bellefonte COLA depends on the staff's review and approval of two NEI draft topical reports: NEI 07-03, "Generic FSAR Template Guidance for Radiation Protection Program Description, Revision 2), and NEI 07-08, "Generic FSAR Template Guidance for Ensuring That Occupational Radiation Exposures Are as Low as is Reasonably Achievable, Revision 0."	N	12.1 through 12.5	Joelle Starefos Tim Frye Ed Roach		12/21/07 – Review dependency identified to TVA. Based on discussions with Phil Ray no additional phone calls needed.
22	The RCOL application does not address TR-05 Rev 4. TR-05 Rev 4 was submitted to complete the activities required to close COL Action Items 3.3-1 and 3.5-1, which treats site interface criteria for Wind and Tornadoes and related external events that may produce missiles more energetic than those postulated for the AP1000 design. TR-05 Rev 4 provides criteria which the applicant must evaluate in order to determine whether these are	N	3.3.1 3.3.2 3.5.1 3.5.2 3.5.3	Tanya Simms Brian Thomas Milton Valentin	12/27/07	12/27/07 – Phone call was held with Phil Ray, Jim Chardos, Neil Haggerty, Peter Hasting, Eddie Grant, Stephanie Coffin and Tanya Simms. TVA stated that section 3.3.3 addresses 3.3-1. Section 3.5.1.5 addresses miscellaneous structures. TVA stated that the same structures described in the DCD resolve this issue. There is not much more information, but if the staff required

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	<p>exceedances or differences with the site design parameters that may compromise the safety of the plant. The criterion requires the applicant to verify whether there are additional structures adjacent to the nuclear island. There is very little or nothing mentioned about the existing structures next to the proposed units 3 and 4 and how these structures may affect the site interface criteria for wind and tornado and the missile spectrum analyzed and approved for the certified design (AP1000 R16 DCD Figure 1.2-2). Therefore, although Bellefonte RCOL is Incorporated By Reference (IBR), it does not address TR-05 Rev 4.</p>					<p>additional information TVA will work to provide it.</p>
23	<p>In FSAR Section 3.7.1, the COL applicant indicates that the site-specific GMRS exceeds the certified AP1000 Certified Seismic Design Response Spectra (CSDRS) in the high-frequency range (i.e., 15-80 Hz for horizontal and 20-85 Hz for vertical motion). Further, the applicant states that these exceedances are within the seismic design margin of the AP1000, and will not adversely affect the systems, structures, or components of the plant. The staff notes that the Bellefonte site is the reference COL for AP1000 and that the Westinghouse AP1000 COL Standard Technical Report (TR-115), "Effects of High-Frequency Seismic Content on SSCs" is intended to fully address the HF issue.</p> <p>For the purposes of the Bellefonte COL acceptance review, SEB1 finds TR-115 to be sufficient for the purpose of conducting a more detailed application review. Additionally, SEB1 is in general agreement with TR-115 that HF motion will be non-damaging to safety-related structures. The staff notes that the approach described in TR-115 is generally consistent with the Draft Interim Staff Guidance (ISG) on Seismic Issues (COL/DC-ISG-1). However, the staff will need additional clarification on several issues relating to TR-115. In particular, a more detailed explanation of the processes for (1) screening in or out SSCs of the analysis, (2) identifying high-frequency susceptible locations, (3) determining the dynamic characteristics of the screened components, and (4) determining critical stress locations and the basis of comparison with the CSDRS will need to be evaluated.</p>	N	3.7.1 3.7.2	Tanya Simms Brian Thomas Bret Tegeler Pravin Patel		<p>12/21/07 Note : The staff's preliminary belief is that this is an AP1000 review issue. Bellefonte is being made aware of the issue because of the potential impacts to the Bellefonte schedule.</p>
24	<p><u>Potential Problem of Structural Wall Design Method for AP1000 DCD</u> Structural walls are widely used for containment internal structures, the shield building, and the auxiliary building. The walls are to be built by pouring concrete into two steel plates, spaced at a certain distance, acting as forms. The DCD states that these walls are designed by treating the steel forms as reinforcing steel bars and using the ACI 349</p>	N		Tanya Simms Brian Thomas		<p>12/21/07 – Note : The staff's preliminary belief is that this is an AP1000 review issue. Bellefonte is being made aware of the issue because of the potential impacts to the Bellefonte schedule. In addition, the staff needs to determine what portion of the issue is within the scope of the AP1000 amendment and what portion is outside the scope of the amendment to determine what 10 CFR 52.63 criteria</p>

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	<p>Code method. The staff believes that the ACI 349 Code method is not applicable to the analysis/design of these walls. This is because the ACI 349 Code method was derived from numerous physical tests of concrete walls containing steel reinforcing bars bonded by concrete and, therefore, the Code method is only applicable to concrete walls containing steel reinforcing bars bonded by concrete. Therefore, Westinghouse may need to either revise its design of the walls to conform with ACI-349 Code or develop its own design method for the walls and justify the adequacy of its design method with sufficient test data.</p>					<p>apply.</p>