

PMBelCOL PEmails

From: Joseph Sebrosky
Sent: Thursday, June 19, 2008 9:02 AM
To: Ray, Phillip M; Eddie R Grant
Cc: Ravindra Joshi; PMBelCOL PEmails
Subject: chapter 1 draft RAI
Attachments: draft chapter 1 RAIs.doc

Attached is a draft RAI for Chapter 1. Please let me know if you wish to discuss the RAI before it is issued in its final version.

Sincerely,

Joe Sebrosky

Hearing Identifier: Bellefonte_COL_Public_EX
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Draft Chapter 1 RAI - Sent to TVA on 6/19/08

**Request for Additional Information
Bellefonte Units 3 and 4
Docket No. 52-014 and 52-015
SRP Section: 01 - Introduction and Interfaces
Application Section: 1.9**

QUESTIONS FROM AP1000 Projects Branch 1

ERAI 439, 01-***

Westinghouse DCD Appendix 1A provides an evaluation of the degree of AP1000 compliance with NRC Division 1 Regulatory Guides. Westinghouse DCD Table 1.9-1 identifies the appropriate DCD cross reference for those regulatory guides applicable to AP1000.

Bellefonte FSAR Section 1.9.1.1, "Division 1 Regulatory Guides-Power Reactors", states in part, "Appendix 1AA provides an evaluation of the degree of compliance with Division 1 regulatory guides as applicable to content of this FSAR, or to the site-specific design, construction and/or operational aspects." Section 1.9.1.1 also states that Table 1.9-201 identifies the appropriate regulatory guide to FSAR cross-reference and the cross-referenced sections contain descriptive information applicable to the regulatory guide positions found in Appendix 1AA. Bellefonte Appendix 1AA supplements the information in DCD Appendix 1A.

Based on the above, for Bellefonte, compliance with Regulatory Guides consists of Westinghouse DCD Appendix 1A and Bellefonte Section 1.9.1.1 and Appendix 1AA.

The result of our review of the above documents is provided below:

1. Appendix 1AA lists the later version of the Regulatory Guides when compared with the DCD Table 1.9-1 {e.g., Reg. Guide 1.7, 1.13, 1.20, 1.26, 1.29, 1.97 (Table 1.9-201 lists Revision 4 but Appendix 1AA discusses Rev. 3)} but does not discuss compliance with the later version. Instead, a statement is provided to indicate that conformance with the earlier revision is documented in the DCD. There is no explanation or justification in Appendix 1AA to indicate why TVA is unable to meet the latest version of the Regulatory Guide. Please clarify the apparent discrepancy between compliance discussions for different revisions of Regulatory Guides.
2. Appendix 1AA documents conformance discussion for Regulatory Guides. However, Appendix 1AA does not identify the appropriate cross reference to FSAR sections for certain Regulatory Guides for descriptive information applicable to those discussions (e.g., Reg. Guide 1.133, 1.135, 1.143, 1.147, 1.154, 1.161, 1.174, 1.175, 1.176, 1.178.). It is noted that the above listed Regulatory Guides are not identified in Table 1.9-201 and, therefore, no descriptive information is available for the staff review. To complete staff's review of FSAR Section 1.9, provide a cross-reference to appropriate FSAR sections.
3. Bellefonte FSAR Section 1.9.1.1 states in part that any exceptions or alternatives to the provisions of the regulatory guides are identified and justification is provided

(reference Appendix 1AA). However, for certain Regulatory Guides exception is provided but not justified. (e. g. R.G. 1.21, Position C.6, provides an exception and states that ANSI N13.1-199 is used. Provide a justification why the specific ANSI standard is an alternative method to meet the specific regulatory Position 0 (other examples are R.G. 1.152, R. G. 8.6).

Please note that additional questions may be forthcoming relevant to the technical and/or regulatory adequacy of this part of the application as the technical staff completes its reviews in the various chapters.