

## CCNPP3COLA PEmails

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**From:** John Rycyna  
**Sent:** Wednesday, September 17, 2008 4:54 PM  
**To:** Wrobel, George  
**Cc:** CCNPP3COL Resource; Joseph Colaccino; Getachew Tesfaye; Michael Miernicki; Samantha Crane; Juan Peralta  
**Subject:** Draft RAI No 15 CQVP 1104.doc  
**Attachments:** Draft RAI No 15 CQVP 1104.doc

George,

Attached is DRAFT RAI No. 15. You have ten working days to review it and to decide whether you need a conference call to discuss it. After the call or after ten days the RAI will be finalized and sent to you. You then have 30 days to respond.

John Rycyna, PE  
Project Manager  
Division of New Reactor Licensing  
Office of New Reactors  
U.S. Nuclear Regulatory Commission  
301-415-4122

**Hearing Identifier:** CalvertCliffs\_Unit3Cola\_Public\_EX  
**Email Number:** 262

**Mail Envelope Properties** (499C2FC6BB962446994CA8682D8ADF330DDC41E356)

**Subject:** Draft RAI No 15 CQVP 1104.doc  
**Sent Date:** 9/17/2008 4:53:48 PM  
**Received Date:** 9/17/2008 4:53:49 PM  
**From:** John Rycyna

**Created By:** John.Rycyna@nrc.gov

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<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	424	9/17/2008 4:53:49 PM
Draft RAI No 15 CQVP 1104.doc		26734

**Options**

**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**

Request for Additional Information No. 15 Revision 0  
DRAFT  
9/17/2008

Calvert Cliffs Unit 3  
UniStar  
Docket No. 52-016

SRP Section: 14.02 - Initial Plant Test Program - Design Certification and New License Applicants  
Application Section: 14.2

## QUESTIONS

### 14.02-3

SRP 14.2.II.SRP Acceptance Criteria.5.B states that test abstracts for the initial test program should include acceptance criteria in sufficient detail to establish the functional adequacy of the SSCs and design features tested. SRP 14.2, "Technical Rationale," further states that an objective of the ITP is to verify that SSCs are capable of performing their safety functions as specified in the design and as assumed/credited in safety analyses. RG 1.68 C.4., "Procedures," states that each test procedure should include acceptance criteria that account for the uncertainties used in transient and accident analysis.

In its review of Subsection 14.2.14 of the CCNPP3 COL, the staff noted that Section 3, "Test Method," of each test abstract includes a comprehensive list of activities that are needed to ensure functional adequacy of SSCs under test. The staff also noted that Section 5, "Acceptance Criteria," of each test abstract contains pointers to design information in other FSAR chapters. However, some test abstracts also include acceptance criteria under the test method section. The acceptance criteria section of the test abstracts do not provide explicit values, prescribed limits, or measurable parameters to allow for the determination that the SSCs under test are capable of performing their safety function.

The staff requests that UniStar Nuclear review all the test abstracts in Section 14.2.14 to ensure that test method and acceptance criteria information are included in the appropriate sections. In addition, the staff requests that UniStar revise the acceptance criteria section of the test abstracts to include sufficient detail to establish the functional adequacy of the SSCs.

### 14.02-4

As stated in Regulatory Guide (RG) 1.68, testing should include verification of redundancy and electrical independence. Appendix A to RG 1.68 provides a representative list of SSCs that should undergo preoperational testing. For many systems including but not limited to the circulating water system, cooling towers, cooling water systems, raw water system and service water system, and fire protection systems Appendix A to RG 1.68 states that tests should be conducted to verify redundancy and electrical independence of these SSCs.

The staff notes that a number of test abstracts in Section 14.2.14 of the CCNP3 COL do not provide for verification of redundancy and electrical independence, as recommended

by RG 1.68. Consistent with this guidance, the staff requests that UniStar revise the applicable test abstracts under Section 14.2.14 to include verification of redundancy and electrical independence of affected SSCs or explain why such verification is not necessary.