CCNPP3COLA PEmails

From: John Rycyna
Sent: Wednesday, October 22, 2008 3:02 PM
To: Wrobel, George
Cc: CCNPP3COL Resource; Joseph Colaccino; Eric Weiss; Kevin Williams
Subject: Draft RAI No 30 ORLT 1135.doc
Attachments: Draft RAI No 30 ORLT 1135.doc

George,

Attached is DRAFT RAI No. 30. 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

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Created By: John.Rycyna@nrc.gov

Recipients:
"CCNPP3COL Resource" <CCNPP3COL.Resource@nrc.gov>
Tracking Status: None
"Joseph Colaccino" <Joseph.Colaccino@nrc.gov>
Tracking Status: None
"Eric Weiss" <Eric.Weiss@nrc.gov>
Tracking Status: None
"Kevin Williams" <Kevin.Williams@nrc.gov>
Tracking Status: None
"Wrobel, George" <George.Wrobel@unistarnuclear.com>
Tracking Status: None

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Calvert Cliffs Unit 3
UniStar
Docket No. 52-016
SRP Section: 13.03 - Emergency Planning
Application Section: 13.03

QUESTIONS for Licensing and Inspection Branch (NSIR/DPR/LIB (EP))

13.03-2

SITE 1.

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980: Criterion II.D; SRP (NUREG-0800) CH 13.3.

As used in the following questions, the terms "difference and deviation" in an Emergency Action Level (EAL) are as defined in RIS 2003-18, Sup 1 "Use of Nuclear Energy Institute (NEI) 99-01, 'Methodology for Development of Emergency Action Levels' dated July 13, 2004.

In Part 5 of the Emergency Plan, Enclosure A of the Calvert Cliffs Nuclear Power Plant Unit 3 (CCNPP3) Combined License (COL) application in the section titled “2.0 Discussion” the applicants state:

> “An initial set of Emergency Action Levels (EALs) for the {Calvert Cliffs Nuclear PowerPlant (CCNPP) Unit 3}, a U.S. Evolutionary Power Reactor (U.S. EPR) has been developed. This initial set of EALs is based on NEI 99-01 Rev 5, with appropriate changes added to include plant design characteristics unique to the U.S. EPR. The intent of this initial set of {CCNPP Unit 3} EALs is to provide consistent emergency classifications internally and between the U.S. EPR plants to the greatest extent possible, limited only by plant specific design or location."

The CCNPP3 definitions of “LARGE AIRCRAFT” and “NORMAL LEVELS” (as shown in Enclosure C on page 7) are not included in NEI 99-01 Rev 5 “Methodology for Development of Emergency Action Levels” dated February 2008. “Airliner” is the approved term in NEI 99-01 Rev 5. The NSIR staff has determined that the proposed definition of LARGE AIRCRAFT should not appear in a publicly available document such as an emergency plan. Instead, the emergency plan should reference the security plan (not publicly available) for a definition of airliner. Specific definitions for large or small aircraft are included in Safeguards Advisory (SA-05-02). Remove the definition of “LARGE AIRCRAFT” and “NORMAL LEVELS” or explain why this deviation is required by the EPR design or the plant specific design or location.

SITE 2.

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980: Criterion II.D; SRP (NUREG-0800) CH 13.3.

Some definitions, such as “VALID” that are part of NEI 99-01 Rev 5 are not included in CCNPP3 EALs. Incorporate the language of NEI 99-01 Rev 5 or explain why these deviations are required by the EPR design or the plant specific design or location.

SITE 3.

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980: Criterion II.D; SRP (NUREG-0800) CH 13.3.

The CCNPP3 EAL technical basis manual, Enclosure C, page 4 does not follow NEI 99-01 Rev 5 section 3.9 “Emergency Action Levels.” Incorporate the language of NEI 99-01 Rev 5 or explain why these deviations are required by the U.S.EPR design or the plant specific design or location.

SITE 4.

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980: Criterion II.D; SRP (NUREG-0800) CH 13.3.

The definition of SIGNIFICANT TRANSIENT specifies a threshold of 50% power. Explain the basis for this value. Additionally, thermal power oscillations are not part of this definition. Either include thermal power oscillations in the definition or explain why thermal power oscillations are not included.

SITE 5.

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980: Criterion II.D; SRP (NUREG-0800) CH 13.3.

CCNPP3 EALS are missing calculated or reference values that must be included before the EALs are usable. When will these values be finalized, how will they be validated, and how will you assure that these values are entered into the EP? A list of missing or calculated values to be provided includes FC2 containment rad graph, FC4 RCS level and calculated clad temperature, FC7 site specific value, RC2(L)1, RC5 clad temperature, CT2 Graph CT2(PL)1, CT3 clad temperature and RCS level, RG1 site specific value/wording, RA1 value for RA1.1, RU1 value for RU1.1, RU1 site specific EAL#1 value/wording, RU2 values for RU2.1a(b1) and RU2.1a(b2) and site specific EAL#1 value/wording, SG3 calculated clad temperature, SU9 value for SU9.1, CG7 value for CG7.2a(b1), CS7 values for CS7.1.b, and CS7.3.b(b)1, and CA7 value for CA7.1.

SITE 6.

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980: Criterion II.D;

SRP (NUREG-0800) CH 13.3.

CCNPP3 EAL FC3 contains a Potential Loss Threshold 1 “This value typically corresponds to the temperature reading that indicates core cooling ORANGE for plants with CSFST [Critical Safety Function Status Tree], which is usually about 700°F to 900°F.” Explain what conditions constitute “ORANGE.” In accordance with NEI 99-01 Rev 5, add additional conditions equivalent to the phrase “or heat sink RED be added” or explain why this additional entry condition is unnecessary.

SITE 7.

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980: Criterion II.D; SRP (NUREG-0800) CH 13.3.

For FC7, does 5% fuel clad damage correspond to 300 µCi/gm? If not, explain what the corresponding activity level is for 5% fuel clad damage.

SITE 8.

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980: Criterion II.D; SRP (NUREG-0800) CH 13.3.

For FC10, explain why are there no fuel clad thresholds based upon core exit temperatures to be consistent with NEI 99-01 Rev 5 FC3?

SITE 9.

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980: Criterion II.D; SRP (NUREG-0800) CH 13.3.

For RC5, why is “Potential Loss” defined differently than in NEI 99-01 Rev 5? Incorporate the language and structure of NEI 99-01 Rev 5 or explain why these deviations are required by the U.S. EPR design or the plant specific design or location.

SITE 10.

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980: Criterion II.D; SRP (NUREG-0800) CH 13.3.

We were unable to identify where the fission product barrier (FBs) for RC1A and RC1B from NEI 99-01 Rev 5 were identified in the CCNPP3 EALs. Identify where these FBs were included or explain why they do not need to be included.

SITE 11.

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980: Criterion II.D; SRP (NUREG-0800) CH 13.3.

CT8 deviates from NEI 99-01 Rev 5 in terminology (unplanned vs. unexplained)

and in number of criteria (2 criteria vs. 6). Incorporate the language and structure of NEI 99-01 Rev 5 or explain why these deviations are required by the U.S. EPR design or the plant specific design or location.

SITE 12.

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980: Criterion II.D; SRP (NUREG-0800) CH 13.3.

Throughout the document the non-standard terminology of “mRem” is used instead of “mrem.” Incorporate the standard terminology or explain why this deviation is required by the U.S. EPR design or the plant specific design or location.

SITE 13.

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980: Criterion II.D; SRP (NUREG-0800) CH 13.3.

RG1 has a note that is not consistent with NEI 99-01 Rev 5. Incorporate the language of NEI 99-01 Rev 5 or explain why these deviations are required by the U.S. EPR design or the plant specific design or location.

SITE 14.

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980: Criterion II.D; SRP (NUREG-0800) CH 13.3.

RS1 deviates from NEI 99-01 Rev 5 AS1 in substance of criterion 1. NEI 99-01 Rev 5 provides for more monitors for criterion 1. The notes for this EAL are not consistent with NEI 99-01 Rev 5. Incorporate the language and structure of NEI 99-01 Rev 5 or explain why these deviations are required by the U.S. EPR design or the plant specific design or location.

SITE 15.

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980: Criterion II.D; SRP (NUREG-0800) CH 13.3.

RA1 deviates from NEI 99-01 Rev 5 AA1 in substance of criterion 1. NEI 99-01 Rev 5 provides for more monitors for criterion 1. Incorporate the language and structure of NEI 99-01 Rev 5 or explain why these deviations are required by the U.S. EPR design or the plant specific design or location.

SITE 16.

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980: Criterion II.D; SRP (NUREG-0800) CH 13.3.

RU1 deviates from NEI 99-01 Rev 5 AU1 in substance of criterion 1. NEI 99-01 Rev 5 provides for more monitors for criterion 1. Incorporate the language and

structure of NEI 99-01 Rev 5 or explain why these deviations are required by the U.S. EPR design or the plant specific design or location.

SITE 17.

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980: Criterion II.D; SRP (NUREG-0800) CH 13.3.

For RA2, what is the technical basis for the criterion ">1000 mR/hr"? Please provide the correlation/calculation from which this value was derived. If there is no correlation/calculation for this value, please explain why the value is appropriate.

SITE 18.

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980: Criterion II.D; SRP (NUREG-0800) CH 13.3.

RU2 deviates from NEI 99-01 Rev 5 AU2 in that criterion 2 omits the word "VALID." Incorporate the language and structure of NEI 99-01 Rev 5 or explain why these deviations are required by the U.S. EPR design or the plant specific design or location.

SITE 19.

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980: Criterion II.D; SRP (NUREG-0800) CH 13.3.

RA3 provides for measuring a dose rate in the control room or central alarm station, but it does not specify how that dose is to be determined or what instrument is to be used. Specify the instruments to be used or explain why this should not be specified.

SITE 20.

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980: Criterion II.D; SRP (NUREG-0800) CH 13.3.

HA1 deviates from NEI 99-01 Rev 5 HA4 in that it uses the term "LARGE AIRCRAFT" instead of "airliner." The term ISFSI is used without a definition. The justification for using the term "LARGE AIRCRAFT" is that it is the U.S. EPR specific term used for airliner. However, nothing in the U.S. EPR design would necessitate this difference in terminology. Incorporate the language and structure of NEI 99-01 Rev 5.

SITE 21.

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980: Criterion II.D; SRP (NUREG-0800) CH 13.3.

HU1 deviates from NEI 99-01 Rev 5 HU4 in that the notes are not consistent. HU1 states “Security events assessed as HOSTILE ACTIONS are classifiable under HA8, HS4 and HG1.” We are unable to locate HA8 and HS4. Are the references to HA8 and HS4 correct? If not, specify the appropriate references and add the note from NEI 99-01 Rev 5.

SITE 22.

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980: Criterion II.D; SRP (NUREG-0800) CH 13.3.

For HA2, incorporate fully the note from NEI 99-01 Rev 5 HA5 or explain why this deviation is required by the U.S. EPR design or the plant specific design or location.

SITE 23.

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980: Criterion II.D; SRP (NUREG-0800) CH 13.3.

For HA3, the basis states “EALs #2 - #6 These EALs should specify site (U.S. EPR) specific structures or areas that contain safety system, or component and functions required for safe shutdown of the plant. Site specific Safe Shutdown Analysis should be consulted for equipment and plant areas required to establish or maintain safe shutdown.” Has the referenced Safe Shutdown Analysis been completed? If not, when will it be completed and how will it be assured prior to it being needed?

SITE 24.

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980: Criterion II.D; SRP (NUREG-0800) CH 13.3.

For HA3, the basis site specific EAL #1 states “The U.S. EPR Maximum Probable Earthquake is 0.30g.” explain why this value is not in the EAL.

SITE 25.

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980: Criterion II.D; SRP (NUREG-0800) CH 13.3.

For HU3, EAL 1.a. states “Seismic event trigger as indicated by PICS seismic monitoring system.” Is the data from PICS available in the Main Control Room? Identify how long it takes to obtain the data.

SITE 26.

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980: Criterion II.D; SRP (NUREG-0800) CH 13.3.

In several instances, the basis sited for EALs is generic and not tailored to the

specific site. Examples of generic guidance in the “Basis” section that should be site specific include:

a. HA3 EAL#4
b. HU3 EAL#1 AND EAL#4

Develop site specific guidance useful to the Calvert Cliffs staff or explain why this should not be done.

SITE 27.

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980: Criterion II.D; SRP (NUREG-0800) CH 13.3.

For HU4, EALs 1 and 2 do not conform to NEI 99-01 Rev. 5 HU2. The list for EAL 2 should be longer. Incorporate the language and structure of NEI 99-01 Rev 5 or explain why these deviations are required by the U.S. EPR design or the plant specific design or location.

SITE 28.

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980: Criterion II.D; SRP (NUREG-0800) CH 13.3.

For HA5, the initiating condition and EAL do not conform to NEI 99-01 Rev. 5 HA3. Incorporate the language and structure of NEI 99-01 Rev 5 or explain why these deviations are required by the U.S. EPR design or the plant specific design or location.

SITE 29.

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980: Criterion II.D; SRP (NUREG-0800) CH 13.3.

For SG1, the generic basis states “The hours to restore AC power can be based on a site blackout coping analysis performed in conformance with 10 CFR 50.63 and Regulatory Guide 1.155, "Station Blackout," as available. Appropriate allowance for off-site emergency response including evacuation of surrounding areas should be considered. Although this Initiating Condition (IC) may be viewed as redundant to the Fission Product Barrier Degradation IC, its inclusion is necessary to better assure timely recognition and emergency response.” Explain the basis for the “2 hours” allowed for restoration of at least one emergency bus?

SITE 30.

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980: Criterion II.D; SRP (NUREG-0800) CH 13.3.

For SS1, SA1, SU1, SS4, CA1, CU1, CU2, CG7, CS7, CA7, CU7, CU8, CU10 should contain the note from NEI 99-01 Rev. 5 that states “The Emergency Director should not wait until the applicable time has elapsed, but should declare the event as soon as it is determined that the condition has exceeded, or will

likely exceed, the applicable time." Incorporate the language and structure of NEI 99-01 Rev 5 or explain why these deviations are required by the U.S. EPR design or the plant specific design or location.

SITE 31.

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980: Criterion II.D; SRP (NUREG-0800) CH 13.3.

SA1 deviates from NEI 99-01 Rev 5 in the initiating condition, EAL 1b, and in the absence of the note. Incorporate the language and structure of NEI 99-01 Rev 5 or explain why these deviations are required by the U.S. EPR design or the plant specific design or location.

SITE 32.

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980: Criterion II.D; SRP (NUREG-0800) CH 13.3.

For SS2, provide specific criteria for your design in the generic basis and justify why voltages selected are appropriate to the design. As written, the basis references 105 VDC when the system is designed for 250 VDC.

SITE 33.

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980: Criterion II.D; SRP (NUREG-0800) CH 13.3.

For SG3, incorporate the NEI 99-01 Rev 5 approach to EAL 2c by specifying indications that core cooling is extremely challenged or the heat sink is extremely challenged rather than loss of a system "Loss of all four trains of Emergency Feedwater." If not, justify why this deviation from NEI 99-01 Rev 5 is required by the U.S. EPR design or the plant specific design or location. Additionally be specific to the U.S. EPR design in the basis where it states "The reactor should be considered shutdown when it is producing less heat than the maximum decay heat load for which the safety systems are designed (typically 3 to 5% power)." Incorporate the structure of NEI 99-01 Rev 5 or explain why these deviations are required by the U.S. EPR design or the plant specific design or location.

SITE 34.

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980: Criterion II.D; SRP (NUREG-0800) CH 13.3.

SA3 deviates from NEI 99-01 Rev 5 SA2, in that EAL 1.a. should not specify a power. Additionally add the note reading "If manual actions taken at the reactor control console fail to shutdown the reactor, the event would escalate to a Site Area Emergency." Incorporate the language and structure of NEI 99-01 Rev 5 or explain why these deviations are required by the U.S. EPR design or the plant specific design or location.

SITE 35.

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980: Criterion II.D; SRP (NUREG-0800) CH 13.3.

SU5 appears to have an incorrect reference to NEI 99-01 Rev 5 SS2 which should be SU2. Explain why the original reference is correct, or revise the EAL.

SITE 36.

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980: Criterion II.D; SRP (NUREG-0800) CH 13.3.

For SU6, the EAL should be specific as to the radios, dedicated offsite alerting system and other listed systems. Change the references to specific systems or explain why this is not appropriate.

SITE 37.

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980: Criterion II.D; SRP (NUREG-0800) CH 13.3.

For SU9, is the “coolant sample activity > 1.0 µCi/gm dose equivalent I-131” an approved technical specification value? Explain the basis for the value.

SITE 38.

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980: Criterion II.D; SRP (NUREG-0800) CH 13.3.

CU1 deviates from NEI 99-01 Rev 5 CU3 in the initiating condition, the EAL and the absence of a note. Incorporate the language and structure of NEI 99-01 Rev 5 or explain why these deviations are required by the U.S. EPR design or the plant specific design or location.

SITE 39.

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980: Criterion II.D; SRP (NUREG-0800) CH 13.3.

For CU2, describe the analysis used to justify the value of “<210 VDC” add the appropriate note, and provide specific guidance in the basis section.

SITE 40.

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980: Criterion II.D; SRP (NUREG-0800) CH 13.3.

For CU6, provide specific guidance in the basis section.

SITE 41

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980: Criterion II.D; SRP (NUREG-0800) CH 13.3.

For CG7, site specific guidance, provide an appropriate discussion for EAL #1 that is useful for the U.S. EPR in light of the fact that "Top of Active Fuel (TOAF) cannot be read by installed level instrumentation in cold modes. {TOAF corresponds to plant elevation 96.0 feet (29.3 meters)}"

SITE 42.

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980: Criterion II.D; SRP (NUREG-0800) CH 13.3.

For CS7, describe what instrument would be used to measure "RPV level **< {96.0 feet (29.3 meters)}** (top of active fuel)." Also, be more specific in the guidance in the generic basis for EAL#1. The site specific basis provided for EAL #1 states "The lowest indicated reactor water level is the bottom of the reactor coolant hot legs {(Plant Elevation +101.9 feet (31.1 meters))}. A location 6" below the reactor coolant system hot legs would be {101.4 feet (30.9 meters)}." Explain why this is not included in the EAL.

SITE 43.

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980: Criterion II.D; SRP (NUREG-0800) CH 13.3.

For CU7 and CU8, explain what procedure is referenced in the EAL.

SITE 44.

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980: Criterion II.D; SRP (NUREG-0800) CH 13.3.

CA10 deviates from NEI 99-01 Rev 5 CA4 in the structure and language of EALs 1 and 2. Incorporate the language and structure of NEI 99-01 Rev 5 or explain why these deviations are required by the U.S. EPR design or the plant specific design or location.

SITE 45.

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980: Criterion II.D; SRP (NUREG-0800) CH 13.3.

CU10 deviates from NEI 99-01 Rev 5 CU4 in the structure and language of the initiating condition. Incorporate the language and structure of NEI 99-01 Rev 5 or explain why these deviations are required by the U.S. EPR design or the plant specific design or location.