

Greg Gibson
Vice President, Regulatory Affairs

100 Constellation Way, Suite 1400P
Baltimore, Maryland 21202-3106



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November 21, 2008

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ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: UniStar Nuclear Energy, NRC Docket No. 52-016
Submittal of Response to Request for Additional Information for the
Calvert Cliffs Nuclear Power Plant, Unit 3 –
RAI No. 22, Revision 0, Question 14.02-8, Initial Plant Test Program –
Design Certification and New License Applicants

Reference: John Rycyna (NRC) to George Wrobel (UniStar), "Draft RAI No. 22 CQVP
1199.doc," email dated October 1, 2008

The purpose of this letter is to respond to the request for additional information (RAI) identified in the NRC e-mail correspondence to UniStar Nuclear, dated October 1, 2008, referenced above. This RAI addresses the Initial Plant Test Program, as discussed in Section 14.2.1 of the Final Safety Analysis Report, as submitted in Part 2 of the CCNPP Unit 3 Combined License Application (COLA), Revision 3.

The enclosure provides the response to RAI No. 22, Revision 0, Question 14.02-8.

If there are any questions regarding this transmittal, please contact me or Mr. George Wrobel at (585) 771-3535.

DOT9
WRO

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 21, 2008

A handwritten signature in black ink, appearing to read 'Greg Gibson', with a stylized, cursive script.

Greg Gibson

Enclosure: Response to NRC Request for Additional Information, Unit 3; RAI No. 22,
Revision 0, Question 14.02-8, Calvert Cliffs Nuclear Power Plant, Unit 3,
November 21, 2008

cc: U.S. NRC Region I
U.S. NRC Resident Inspector, Calvert Cliffs Nuclear Power Plant, Units 1 and 2
NRC Environmental Project Manager, U.S. EPR Combined License Application
NRC Project Manager, U.S. EPR Combined License Application
NRC Project Manager, U.S. EPR Design Certification Application (w/o enclosure)

Enclosure

Response to NRC Request for Additional Information

RAI No. 22, Revision 0, Question 14.02-8

Initial Plant Test Program – Design Certification and New License Applicants

Calvert Cliffs Nuclear Power Plant, Unit 3

November 21, 2008

RAI No. 22

Question 14.02-8

Standard Review Plan (SRP, NUREG-0800) Section 14.2.II.3.A.ii, concerning acceptance criteria for combined license (COL) and operating license applicants, "Management Organizations," states that "[t]he applicant should provide (1) the organizational descriptions for any augmenting organizations or other personnel who will manage or execute any phase of the test program, and (2) the responsibilities, interfaces, and authorities of the principal participants."

The applicant's FSAR, Section 14.2.2 "Organization and Staffing," states in part that "[t]he plant operating, maintenance, and engineering personnel are utilized to the extent practicable during the Startup Test Program. The plant staff operates permanently installed and powered equipment for Phases I through IV and subsequent system tests. Plant personnel such as instrument and controls, chemistry, computer, radiation protection, and maintenance personnel are used to perform tests and inspections in the areas in which they will primarily work during plant operation." Section 13.1 of the applicant's FSAR, "Organizational Structure of Applicant," provides some details on the roles and responsibilities of plant staff.

The applicant's FSAR in sections 14.2.2 and 13.1 does not specify the responsibilities, interfaces, and authorities of the principal participants of the plant staff as they relate to the initial test program. The NRC staff requests that the applicant supplement section 14.2.2 of its FSAR to include further details on the responsibilities, interfaces, and authorities of the principal participants of the plant staff as they relate to the initial test program as described in the SRP, or to justify an alternative.

Response

The plant staff is not responsible for managing or executing the initial test program. The use of plant staff employees during Phases I through IV is intended to be within their normal site-specific activities and qualifications during plant operation. For example, I&C technicians would be expected to perform instrument calibrations and mechanics would be expected to perform lubrication routes and pump alignment on components that have been turned over to startup consistent with their normal plant responsibilities. It is not anticipated to place I&C technicians and mechanics in a startup engineer role. If they were used in a startup engineer role, they would be required to meet those stated qualifications.

FSAR Impact

The FSAR will not be changed as a result of this question.