

Greg Gibson  
Vice President, Regulatory Affairs

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



10 CFR 50.4  
10 CFR 52.79

November 21, 2008

UN#08-070

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. 20, Revision 0, Question 14.02-6, Initial Plant Test Program –  
Design Certification and New License Applicants

Reference: John Rycyna (NRC) to George Wrobel (UniStar), "Draft RAI No. 20 CQVP  
1203.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 14.2.8 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. 20, Revision 0, Question 14.02-6.

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

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NR2

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

Executed on November 21, 2008



Greg Gibson

Enclosure: Response to NRC Request for Additional Information, RAI No. 20, Revision 0,  
Question 14.02-6, 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. 20, Revision 0, Question 14.02-6**

**Calvert Cliffs Nuclear Power Plant, Unit 3**

**November 21, 2008**

**RAI No. 20, Revision 0**

**Question 14.02-6**

Regulatory Guide (RG) 1.68, Section C.4, "Procedures," states that "each test procedure should include acceptance criteria that account for the uncertainties used in transient and accident analyses." RG 1.68, Appendix C, Section 1.f, "Acceptance Criteria," provides that "[t]he test procedure should clearly identify the criteria against which the success or failure of the test will be judged, and should account for measurement errors and uncertainties. In some cases, these will be qualitative criteria. Where applicable, quantitative values with appropriate tolerances should be designated as acceptance criteria."

The applicant's FSAR, Section 14.2.3.4, "Acceptance Criteria," does not specifically address these provisions. Please revise Section 14.2.3.4 to state that test acceptance criteria will account for measurement errors and uncertainties used in the transient and accident analyses, or justify an alternative.

**Response**

Additional details have been included in U.S. EPR FSAR Tier 2, Section 14.2.3 to address Regulatory Guide 1.68, Regulatory Position C.4, and Appendix C, Item 1.f. See AREVA response to U.S. EPR FSAR RAI No. 68, question 14.02-27 for additional information on U.S. EPR FSAR Section 14.2.3.

**COLA Impact**

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