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NUCLEAR ENERGY

10 CFR 50.4
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December 19, 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
Response to Request for Additional Information for the
Calvert Cliffs Nuclear Power Plant, Unit 3
RAI No. 26, Revision 0, Question 14.02-13,
Initial Plant Test Program – Design Certification and New License Applicants

Reference: John Rycyna (NRC) to George Wrobel (UniStar), "Draft RAI No 26 CQVP 1199.doc," email dated October 21, 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 21, 2008 (Reference). This RAI addresses the Initial Plant Test Program, as discussed in Section 14.2.1 of the Final Safety Analysis Report (FSAR), as submitted in Part 2 of the CCNPP Unit 3 Combined License Application (COLA), Revision 3.

The enclosure provides our response to RAI No. 26, Revision 0, Question 14.02-13, which includes revised COLA content. A Licensing Basis Document Change Request has been initiated to incorporate this change into a future revision of the COLA. There are no new regulatory commitments in this correspondence.

D079
NRO

If there are any questions regarding this transmittal, please contact me at (410) 470-4205 or Mr. George Wrobel at (585) 771-3535.

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

Executed on December 19, 2008

Greg Gibson

Enclosure: Response to NRC Request for Additional Information, RAI No. 26, Revision 0, Question 14.02-13, Initial Plant Test Program – Design Certification and New License Applicants

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. 26, Revision 0, Question 14.02-13,
Initial Plant Test Program – Design Certification and New License Applicants

December 19, 2008

RAI No. 26

Question 14.02-13

Regulatory Guide 1.68, Appendix A, Section 1.k.2, states that "[a]ppropriate tests should be conducted to demonstrate the proper operation of the following types of systems and components used to monitor or measure radiation levels, provide for personnel protection, or control or limit the release of radioactivity: . . . (2) personnel monitors and radiation survey instruments."

These tests are not included in Section 14.2.14 of the applicant's FSAR, "COL Applicant Site-Specific Tests," or in Section 14.2.12 of the incorporated U.S. EPR FSAR, "Independent Test Descriptions." The NRC staff requests that the applicant amend Section 14.2.14 to include the testing of personnel monitors and radiation survey equipment, or to justify why such tests are not required.

Response

Section 14.2.14.10 will be added to the FSAR as shown below to include testing of personnel monitors and radiation survey instruments.

FSAR Impact

14.2.14.10 *Portable Personnel Monitors and Radiation Survey Instruments*

1. OBJECTIVES
   a. To demonstrate the ability of the Portable Personnel Monitors and Radiation Survey Instruments to monitor radiation levels.
   b. Provide local and remote indications, if applicable, to alert personnel of potential releases.
2. PREREQUISITES
   a. Construction activities on the Portable Personnel Monitors and Radiation Survey Instruments have been completed.
   b. Area ventilation systems in the area where the Portable Personnel Monitors and Radiation Survey Instruments are installed are functional.
   c. Plant ventilation systems in the areas where plant personnel are working are complete and functional.
   d. The plant access control has been established (doors and access points installed and wall, ceiling, and floor penetrations in their design condition). This prerequisite ensures that personnel exit routes that do not pass through the Portable Personnel Monitors and Radiation Survey Instruments have been eliminated.
   e. Test instrumentation available and calibrated.
   f. Support systems (120 volt AC, purge gas, etc.) are available.

3. TEST METHOD
   a. Verify alarms, displays, indications and status lights both locally and in the plant access control area are functional.
   b. Verify that background levels have been established.
   c. Verify that alarms and displays are capable of detecting activity levels that are above the acceptance levels.
4. DATA REQUIRED
   a. Background level settings.
   b. Setpoints at which alarms and status light displays occur.
5. ACCEPTANCE CRITERIA
   a. Alarms, displays, and status lights indicate locally and in the plant access control area.
   b. The background radiation level from radon and other sources doesn't reduce the ability to detect radiation releases.
   c. The Portable Personnel Monitors and Radiation Survey Instruments are capable of detecting test sources.