CCNPP3COLA PEmails

From: John Rycyna
Sent: Thursday, February 12, 2009 1:34 PM
To: Poche, Robert; McQueeney, Jennifer
Cc: Ching Ng; CCNPP3COL Resource; Jennifer Dixon-Herrity; Michael Miernicki; Joseph Colaccino; James Biggins; Adam Gendelman
Subject: Draft RAI No 70 EMB2 1757.doc (PUBLIC)
Attachments: Draft RAI No 70 EMB2 1757.doc

Rob,

Attached is DRAFT RAI No. 70. You have until February 26, 2009 to review it and to decide whether you need a conference call to discuss it. After the call or after February 26, 2009 the RAI will be finalized and sent to you. You then have 30 days to respond.

John Rycyna, PE
Sr. 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: 534

Mail Envelope Properties (499C2FC6BB962446994CA8682D8ADF3316CBC74318)

Subject: Draft RAI No 70 EMB2 1757.doc (PUBLIC)
Sent Date: 2/12/2009 1:33:39 PM
Received Date: 2/12/2009 1:33:42 PM
From: John Rycyna

Created By: John.Rycyna@nrc.gov

Recipients:
"Ching Ng" <Ching.Ng@nrc.gov>
Tracking Status: None
"CCNPP3COL Resource" <CCNPP3COL.Resource@nrc.gov>
Tracking Status: None
"Jennifer Dixon-Herrity" <Jennifer.Dixon-Herrity@nrc.gov>
Tracking Status: None
"Michael Miernicki" <Michael.Miernicki@nrc.gov>
Tracking Status: None
"Joseph Colaccino" <Joseph.Colaccino@nrc.gov>
Tracking Status: None
"James Biggins" <James.Biggins@nrc.gov>
Tracking Status: None
"Adam Gendelman" <Adam.Gendelman@nrc.gov>
Tracking Status: None
"Poche, Robert" <robert.poche@unistarnuclear.com>
Tracking Status: None
"McQueeney, Jennifer" <Jennifer.McQueeney@unistarnuclear.com>
Tracking Status: None

Post Office: HQCLSTR02.nrc.gov

Files	**Size**	**Date & Time**
MESSAGE	441	2/12/2009 1:33:42 PM
Draft RAI No 70 EMB2 1757.doc	28782	

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

Request for Additional Information No. 70
DRAFT
2/12/2009

Calvert Cliffs Unit 3
UniStar
Docket No. 52-016
SRP Section: 14.03.03 - Piping Systems and Components - Inspections, Tests, Analyses, and Acceptance Criteria
Application Section: 14.3.3

QUESTIONS for Engineering Mechanics Branch 2 (ESBWR/ABWR Projects) (EMB2)

14.03.03-1

10 CFR 52.80(a) requires that a COL application must contain:

"(a) The proposed inspections, tests, and analyses [ITA], including those applicable to emergency planning, that the licensee shall perform, and the acceptance criteria [AC] that are necessary and sufficient to provide reasonable assurance that, if the inspections, tests, and analyses are performed and the acceptance criteria met, the facility has been constructed and will be operated in conformity with the combined license, the provisions of the [Atomic Energy] Act, and the Commission's rules and regulations."

In the Calvert Cliffs Nuclear Power Plant, Unit 3 COL application, Part 10, ITAAC, Appendix B, Table 2.4-24, "{Ultimate Heat Sink [UHS] Makeup Water System Inspections, Tests, Analyses, and Acceptance Criteria}," item 9, the applicant states that "[t]he ASME Code Section III piping of the UHS Makeup Water System is designed and constructed to ASME Code Section III requirements."

"Inspections of the as-built piping will be conducted, as documented in the ASME Design Reports."

"The ASME Code Section III design reports exist for the as-built ASME Code Section III piping of the UHS Makeup Water System."

The applicant's FSAR, Section 14.3, which concerns ITAAC, does not identify what the particular design reports are, or describe the contents of those reports. NUREG-0800, "Standard Review Plan (SRP), Section 14.3.3, "PIPING SYSTEMS AND COMPONENTS - INSPECTIONS, TESTS, ANALYSES, AND ACCEPTANCE CRITERIA," provides that "[a]n acceptable version of an ASME Code certified stress report is the design document required by ASME Code, Section III, Subarticle NCA-3550."

Some of the components and piping of the UHS Makeup Water System are classified as ASME Code Section III in the applicant's FSAR Section 3.2, "CLASSIFICATION OF STRUCTURES, SYSTEMS, AND COMPONENTS," Table 3.2-1. The applicant's FSAR, Section 3.12, "ASME CODE CLASS 1, 2, AND 3 PIPING SYSTEMS, PIPING COMPONENTS, AND THEIR ASSOCIATED SUPPORTS," does not provide sufficient information related to the design of ASME Code Class 1, 2, and 3 piping systems. SRP

Section 14.3.3 further provides that "[a]n acceptable approach to Tier 1 information for piping design is to specify distinct ITAAC that ensure the design process for piping systems occurs as described in the design description. . . . A certified piping stress report provides assurance that requirements of the ASME Code, Section III for design, fabrication, installation, examination, and testing have been met and that the design complies with the design specifications."

1) Include in the application an ITAAC for the design of the UHS Makeup Water System's piping. Acceptable ITA are an inspection of approved ASME Code documents for piping. Acceptable AC are the approved ASME Code documents with a finding that that the UHS Makeup Water piping was designed in accordance with ASME Code Section III requirements. Otherwise, justify an alternative

2) Include in the application an ITAAC for the fabrication and installation of the UHS Makeup Water piping system. Acceptable ITA are an inspection of system piping. Acceptable AC are certified ASME Code Data Reports and inspection reports documenting that the piping is fabricated, installed, and inspected in accordance with ASME Code Section III requirements. Otherwise, justify an alternative.

3) Include in the application an ITAAC for the as-built reconciliation of the piping system. Acceptable ITA are analyses to reconcile the as-built condition of the system piping with approved design documents. Acceptable AC are the approved ASME Code documents with a finding that design reconciliation has been completed in accordance with the ASME Code Section III requirements. Otherwise, justify an alternative.

4) Address the same issues raised in 1), 2), and 3) above for components designated as ASME Code Section III in item 8 of Table 2.4-24 in Part 10, ITAAC, Appendix B of the application. Otherwise, justify an alternative.