

## CCNPP3COLA PEmails

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**From:** John Rycyna  
**Sent:** Monday, March 16, 2009 10:45 AM  
**To:** Poche, Robert; McQueeney, Jennifer; katie.thurstin@unistarnuclear.com  
**Cc:** CCNPP3COL Resource; Samantha Crane; Juan Peralta; Michael Miernicki; Joseph Colaccino; James Biggins; Adam Gendelman  
**Subject:** Draft RAI No 92 CQVP 1693.doc (PUBLIC)  
**Attachments:** Draft RAI No 92 CQVP 1693.doc

Rob,

Attached is DRAFT RAI No. 92. You have until March 30, 2009 to review it and to decide whether you need a conference call to discuss it. After the call or after March 30, 2009 the RAI will be finalized and sent to you. You then have 30 days to respond.

John Rycyna, PE  
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Division of New Reactor Licensing  
Office of New Reactors  
U.S. Nuclear Regulatory Commission  
301-415-4122

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**From:** John Rycyna

**Created By:** John.Rycyna@nrc.gov

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Request for Additional Information No. 92  
DRAFT  
3/16/2009

Calvert Cliffs Unit 3  
UniStar  
Docket No. 52-016

SRP Section: 14.02 - Initial Plant Test Program - Design Certification and New License Applicants  
Application Section: 14.2.8.1

QUESTIONS for Quality and Vendor Branch 1 (AP1000/EPR Projects) (CQVP)

14.02-35

In an RAI to AREVA for the U.S. EPR FSAR, RAI 14.02-45, the staff recommended that AREVA remove the paragraph stating, "The first COL applicant that references the U.S. EPR certified design will commit to review results from European predecessors concerning the new, unique, or novel EPR features such as those previously noted and propose supplemental testing if necessary," from Section 14.2.8.1 of the U.S. EPR FSAR. The statement to commit only the first COL applicant to review the operating and testing experience is a redundant COL information item as this action item is already contained in the commitment in 14.2.8 which states that all plants will review all reactor operating and testing experiences. In response to the staff's request, AREVA submitted a proposed revision to the U.S. EPR FSAR, which deleted the paragraph and the associated COL Information Item from U.S. EPR FSAR Tier 2, Table 1.8-2—U.S. EPR Combined License Information Items.

Consistent with the proposed change to the U.S. EPR FSAR, the staff requests that UniStar delete the following paragraphs from Section 14.2.8.1 of the CCNP3 COLA:

"The U.S. EPR FSAR includes the following COL Item in Section 14.2.8.1:

The first COL applicant that references the U.S. EPR certified design will commit to review results from European predecessors concerning the new, unique, or novel EPR features such as those previously noted and propose supplemental testing if necessary.

This COL item is addressed as follows:

{CCNPP Unit 3 is the first COL applicant that references the U.S. EPR certified design. The first COL applicant commits to review results from European predecessors concerning the new, unique, or novel EPR features such as those previously noted in U.S. EPR FSAR Section 14.2.8.1 and to propose supplemental testing if necessary. This information is shared with subsequent COL applicants.}"

In addition, the staff requests that UniStar remove the associated COL Information Item, COL Item 14.2-6, from Table 1.8-2—{FSAR Sections that Address COL Items} in Chapter 1 of the CCNP3 COLA.

14.02-36

In an RAI to AREVA for the U.S. EPR FSAR, RAI 14.02-15, the staff requested that AREVA revise Section 14.2.11 of the U.S. EPR FSAR to clarify that plant safety will not be dependent on the performance of untested SSCs during any phase of the startup test program. In a follow-up RAI to AREVA for the U.S. EPR FSAR, RAI 14.02-16, the staff requested that AREVA revise Section 14.2.11 of the U.S. EPR FSAR to state that test requirements will be completed in accordance with plant Technical Specification requirements for SSC operability before changing plant modes. In response to the staff's requests, AREVA proposed to revise section 14.2.11 and the COL Item contained in that section to state:

"A COL applicant that references the U.S. EPR certified design will develop a test program that considers the following **seven** guidance components:

- The applicant should allow at least nine months to conduct preoperational testing.
- The applicant should allow at least three months to conduct startup testing, including fuel loading, low-power tests, and power-ascension tests.
- **Plant safety will not be dependent on the performance of untested SSCs during any phase of the startup test program.**
- **Surveillance test requirements will be completed in accordance with plant Technical Specification requirements for SSC operability before changing plant modes.**
- Overlapping test program schedules (for multiunit sites) should not result in significant divisions of responsibilities or dilutions of the staff provided to implement the test program.
- The sequential schedule for individual startup tests should establish, insofar as practicable, that test requirements should be completed prior to exceeding 25 percent power for SSC that are relied on to prevent, limit, or mitigate the consequences of postulated accidents.
- Approved test procedures should be in a form suitable for review by regulatory inspectors at least 60 days prior to their intended use or at least 60 days prior to fuel loading for fuel loading and startup test procedures."

Consistent with the proposed revision to the U.S. EPR FSAR, the staff requests that UniStar revise section 14.2.11 of the CCNPP3 FSAR to include the additional two guidance components for developing the site-specific test program. In addition, the staff requests that UniStar revise the associated COL Information Item, COL Item 14.2-2, in Table 1.8-2—{FSAR Sections that Address COL Items} in Chapter 1 of the CCNPP3 COLA.