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March 20, 2009

UN#09-135

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. 67, Question 03.11-1, Environmental Qualification

References: 1) John Rycyna (NRC) to Robert Poche (UniStar), "RAI No. 67 CIB1 1545.doc
(PUBLIC)" email dated February 20, 2009

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 February 20, 2009 (Reference 1). This RAI addresses Environmental Qualification, as discussed in Section 3.11.6 of the Final Safety Analysis Report (FSAR), as submitted in Part 2 of the Calvert Cliffs Nuclear Power Plant (CCNPP) Unit 3 Combined License Application (COLA), Revision 4.

The enclosure provides our response to RAI No. 67, Question 03.11-1. Our response to Question 03.11-1 does not include any new regulatory commitments and does not require revised COLA content.

If there are any questions regarding this transmittal, please contact me at (410) 470-4205, or Mr. Michael J. Yox at (410) 495-2436.

D079
NRO

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

Executed on March 20, 2009

A handwritten signature in black ink, appearing to read 'Greg Gibson', with a long horizontal line extending to the right.

Greg Gibson

Enclosure: Response to NRC Request for Additional Information, RAI No. 67, Question
03.11-1, Environmental Qualification, Calvert Cliffs Nuclear Power Plant, Unit 3

cc: John Rycyna, NRC Project Manager, U.S. EPR COL Application
Thomas Fredrichs, NRC Environmental Project Manager, U.S. EPR COL Application
Getachew Tesfaye, NRC Project Manager, U.S. EPR DC Application (w/o enclosure)
Loren Plisco, Deputy Regional Administrator, NRC Region II (w/o enclosure)
Silas Kennedy, U.S. NRC Resident Inspector, CCNPP, Units 1 and 2
U.S. NRC Region I Office

Enclosure

**Response to NRC Request for Additional Information
RAI No. 67, Question 03.11-1, Environmental Qualification
Calvert Cliffs Nuclear Power Plant, Unit 3**

RAI No. 67

Question 03.11-1

In the CCNPP3 COL FSAR Section 3.11.6, the applicant incorporated by reference, without any departures or supplements, Section 3.11.6 of the U.S. EPR FSAR, which is being reviewed under docket number 52-020. Section 3.11.6 of the U.S. EPR FSAR references Subsection 3.11.2.2, "Environmental Qualification of Mechanical Equipment," which addresses U.S. EPR's approach to qualification of mechanical equipment.

In Tier 2, Section 3.11.2.2 of the U.S. EPR FSAR, AREVA states that the U.S. EPR's approach to qualification of mechanical equipment is based on methods developed and accepted for the South Texas Project (STP), Units 1 and 2 in References 24, 25, 26, and 27 of the U.S. EPR FSAR Section 3.11.2.2. The program AREVA is proposing for U.S. EPR might not be acceptable for use as an initial mechanical EQ program under a design certification. The STP approach was based on a 50.59 evaluation ensuring that existing mechanical EQ methods were maintained using operational programs such as maintenance, surveillance, and procurement programs that were redundant with the mechanical EQ program. These operational programs are not contained in the U.S. EPR design certification application and should be addressed by the COL applicant. Thus, for CCNPP3, the staff requests the COL applicant to describe the maintenance, surveillance, and procurement operational programs in the COL FSAR in sufficient detail to demonstrate that it is unnecessary to develop a mechanical EQ program for initial qualification of mechanical components.

Response

AREVA NP Inc. (AREVA NP) is responsible for fully describing the mechanical equipment qualification (MEQ) program. AREVA NP has agreed to resolve NRC questions related to the MEQ program within the scope of the U.S. EPR design certification application; including providing a supplement to the response that NRC references in this RAI. This approach has been discussed with the NRC.

COLA Impact

No changes to the CCNPP Unit 3 COLA are required.