## CCNPP3COLA PEmails

**From:** Poche, Robert [robert.poche@unistarnuclear.com]
**Sent:** Friday, December 12, 2008 5:34 PM
**To:** John Rycyna
**Cc:** Price, John (UniStar)
**Subject:** Response to CCNPP Unit 3 RAI Sets 31 and 32
**Attachments:** RAI Set 31 Response.pdf; RAI Set 32 Response.pdf

John,

I have attached copies of the response letters for CCNPP Unit 3 RAI Set 31, Applicable Code Cases, and RAI Set 32, Compliance with Codes and Standards. Please feel free to contact me if you have any questions.

<<RAI Set 31 Response.pdf>> <<RAI Set 32 Response.pdf>>

Robert Poche

UniStar Licensing Engineer

(410) 470-5530 Constellation

(509) 528-5513 Cell

robert.poche@constellation.com

rpoche1@aol.com

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**Subject:** Response to CCNPP Unit 3 RAI Sets 31 and 32
**Sent Date:** 12/12/2008 5:33:59 PM
**Received Date:** 12/12/2008 5:34:09 PM
**From:** Poche, Robert

**Created By:** robert.poche@unistarnuclear.com

**Recipients:**
"Price, John (UniStar)" <John.Price2@unistarnuclear.com>
Tracking Status: None
"John Rycyna" <John.Rycyna@nrc.gov>
Tracking Status: None

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| MESSAGE | 830 | 12/12/2008 5:34:09 PM |
| RAI Set 31 Response.pdf | 469438 | |
| RAI Set 32 Response.pdf | 733967 | |

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

Greg Gibson
Vice President, Regulatory Affairs

250 West Pratt Street, Suite 2000
Baltimore, Maryland 21201

UniStar
NUCLEAR ENERGY

10 CFR 50.4
10 CFR 52.79

December 12, 2008

UN#08-088

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. 31, Revision 0 – Applicable Code Cases, Question 05.02.01.02-2

Reference: John Rycyna (NRC) to George Wrobel (UniStar), "RAI No. 31 EMB1 1177.doc," email dated November 12, 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 November 12, 2008 (Reference). This RAI addresses Applicable Code Cases, as discussed in Section 5.2.1.2 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. 31, Question 05.02.01.02-2.

There are no regulatory commitments identified in this letter.

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

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

Executed on December 12, 2008

Greg Gibson

Enclosure: Response to RAI No. 31, Revision 0, Applicable Code Cases, Question 05.02.01.02-2

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**

**Responses to RAI No. 31, Revision 0**

**Applicable Code Cases**

**Question 05.02.01.02-2**

**December 12, 2008**

**RAI No. 31, Revision 0 (Question 05.02.01.02-2, RAI 5.2.1.2-1)**

In Section 5.2.1.2 of Calvert Cliffs COL application, Calvert Cliffs addresses the COL information item by indicating that no additional ASME code cases will be utilized for the Calvert Cliffs unit 3. The applicant is requested to confirm that no ASME Code Cases other than the two code cases listed in Table 5.2-1 will be used for the piping and component design, preservice inspection (PSI) and inservice inspection (ISI) for the proposed unit. If there are other Code Cases to be used for the Calvert Cliffs COL application, provide a list of these code cases which must be acceptable to the NRC in accordance with Regulatory Guides 1.84, 1.147 and 1.192. If they are not acceptable to the NRC in accordance with Regulatory Guides 1.84, 1.147 and 1.192, provide justification for use of those code cases in accordance with 10CFR50.55a(a)(3), (b)(4), (b)(5) and (b)(6).

**Response**

U.S. EPR FSAR, Section 5.2.1.2, Table 5.2-1 lists the code cases applicable to the EPR design. No other code cases will be utilized at this time. See U.S. EPR FSAR, RAI No. 51 for additional information on U.S. EPR FSAR, Section 5.2.1.2, Table 5.2-1 code cases.

**CCNPP Unit 3 FSAR Impact**

The CCNPP3 FSAR will not be changed as a result of this question.

Greg Gibson
Vice President, Regulatory Affairs

250 West Pratt Street, Suite 2000
Baltimore, Maryland 21201

UniStar
NUCLEAR ENERGY

10 CFR 50.4
10 CFR 52.79

December 12, 2008

UN#08-086

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. 32, Revision 0 – Compliance with the Codes and Standards Rule, 10 CFR 50.55a, Question 05.02.01.01-1, RAIs 5.2.1.1-1 and 5.2.1.1-2

Reference: John Rycyna (NRC) to George Wrobel (UniStar), "Draft RAI No 25 RGS 1145.doc," email dated October 6, 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 6, 2008 (Reference above). This RAI addresses Compliance with Codes and Standards Rule, 10 CFR 50.55a, as discussed in Section 5.2.1.1 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. 32, Question 05.02.01.01-1.

There are no regulatory commitments identified in this letter.

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

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

Executed on December 12, 2008

Greg Gibson

Enclosure: Response to RAI No. 32, Revision 0, Compliance with the Codes and Standards Rule 10 CFR 50.55a, Question 05.02.01.01-1

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 RAI No. 32, Revision 0**

**Compliance with the Codes and Standards Rule 10 CFR 50.55a**

**Question 05.02.01.01-1**
**RAI 5.2.1.1-1 and RAI 5.2.1.1-2**

**December 12, 2008**

**RAI Number 32**

**Question 5.02.01.01-1**

**RAI 5.2.1.1-1**

In Section 5.2.1.1 of the applicant's FSAR, "Compliance with 10 CFR 50.55a," the applicant addresses section 5.2.1.1 of the U.S. EPR FSAR, an outstanding COL information action item, noting that "[t]he code of record for the design is the 2004 edition of the ASME Boiler and Pressure Vessel Code (no addenda). This code is consistent with the code established in U.S. EPR FSAR Section 5.2.1. No relief requests or alternatives are required." The applicant is requested to clarify how the application of the 2004 edition of the ASME Code satisfies the requirements of 10 CFR 50.55a(b)(1)(ii) and (iii).

**RESPONSE to RAI 5.2.1.1-1:**

As noted in the response to U.S. EPR Design Certification Application RAI No. 41, Question 05.02.01.01-1[1], AREVA NP will delete the Combined License (COL) information item in U.S. EPR FSAR Tier 2, Section 5.2.1.1. Description of how the U.S. EPR piping and components complies with 10 CFR 50.55a(b)(1)(ii) and (iii) is provided in AREVA NP topical report ANP-10264NP, "U.S EPR Piping Analysis and Pipe Support Design Topical Report," which has been reviewed and approved by NRC. Refer to Section 3.1.1 of the Final Safety Evaluation Report for ANP-10264NP[2].

**FSAR Impact:**

The COL FSAR will be revised to remove information regarding the COL information item in the U.S. EPR FSAR Tier 2, Section 5.2.1.1, since this information item has been deleted.

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[1] E-mail, Ronda Pederson (AREVA NP Inc.) to Getachew Tesfaye (NRC), et al, "Response to U.S. EPR Design Certification Application RAI No. 41, FSAR Ch 5," August 15, 2008.

[2] Letter, Getachew Tesfaye (NRC) to Ronnie L. Gardner (AREVA NP Inc), "Final Safety Evaluation Report Regarding ANP-10264NP, 'U.S. EPR Piping Analysis and Pipe Support Design Topical Report' (TAC NO. MD3128)," August 11, 2008 (ML082140858).

**RAI Number 32**

**Question 5.02.01.01-1**

**RAI 5.2.1.1-2**

In Section 5.2.1.1 of Calvert Cliffs COL application, it noted that a COL applicant that references the U.S. EPR design certification will identify subsequent ASME Code editions or addenda that may be used and will determine the consistency of the U.S. EPR design with construction practices (including inspection and examination methods) reflected within the subsequent code editions and addenda identified in the COL application. The staff noted that the Calvert Cliffs COLA incorporates by reference to the EPR DCD, the 2001 Edition of the ASME Code through 2003 Addenda which were used for EPR piping design except that the 1993 Addenda of the ASME Code was used for seismic design of piping in compliance with the restriction of 10CFR50.55a (b)(1)(iii). Based on the restriction, ASME Code Editions and Addenda later than and including 1994 Addenda can not be used for seismic design of piping. The applicant is requested to provide justification in compliance with 10CFR50.55a(a)(3) for the use of ASME Code editions or addenda other than the 2004 edition of ASME code, which is the code of record for the EPR design certification.

**RESPONSE to RAI 5.2.1.1-2:**

The 2001 Edition of the ASME Code through 2003 Addenda, along with the 1993 Addenda were used in preparing the Piping Analysis Topical Report (ANP-10264NP). At the time of its acceptance by the NRC, 10CFR50.55a specified the use of these versions of the ASME Code. Differences between the two codes have been reconciled and it has been verified that the U.S. EPR design and safety analyses meet the requirements of the code of record.

**FSAR Impact:**

No impact