

CCNPP3COLA PEmails

From: John Rycyna
Sent: Thursday, April 16, 2009 9:32 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: RAI No 98 CQVP 1975.doc (PUBLIC)
Attachments: RAI No 98 CQVP 1975.doc

Rob,

Attached please find the subject request for additional information (RAI). A draft of the RAI was provided to you on April 2, 2009. No conference call was requested to discuss this RAI. The schedule we have established for review of your application assumes technically correct and complete responses within 30 days of receipt of RAIs. For any RAIs that cannot be answered within 30 days, it is expected that a date for receipt of this information will be provided to the staff within the 30 day period so that the staff can assess how this information will impact the published schedule.

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From: John Rycyna

Created By: John.Rycyna@nrc.gov

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Request for Additional Information No. 98
4/16/2009

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

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

14.02-37

In RAI 14.02-05, the staff requested that UniStar clarify the roles and responsibilities of the Startup Manager, Startup Engineer, Preoperational Test Engineer, and System Engineer. In response to this RAI, UniStar clarified that the Startup and Preoperational Test Engineers are responsible for performing startup and preoperational tests. The title differences somewhat reflect the test program "phase," although their duties and responsibilities are similar within the overall test program. Although there may be some overlap, Preoperational Test Engineers generally conduct tests in Phase 1 whereas Startup Engineers generally conduct tests during Phase II, Phase III and Phase IV. In addition, UniStar provided a mark-up of Section 14.2 of the Calvert Cliffs Unit 3 FSAR in which "Startup Engineer" was replaced with "Startup/Preoperational Test Engineer." However, the FSAR mark-up did not contain a description of the difference between these two positions. The NRC staff requests that UniStar revise Ch 14.2 of the Calvert Cliffs Unit 3 FSAR to include brief descriptions of the differences between the Startup and Preoperational Test Engineers consistent with the answer given to RAI 14.02-5.

14.02-38

Standard Review Plan (SRP, NUREG-0800) Section 14.2.II.3.A.ii, concerning acceptance criteria for combined license (COL) and operating license applicants, "Management Organizations," states that "[t]he applicant should provide (1) the organizational descriptions for any augmenting organizations or other personnel who will manage or execute any phase of the test program, and (2) the responsibilities, interfaces, and authorities of the principal participants."

In RAI 14.02-08, the NRC staff requested that UniStar supplement section 14.2.2 of its FSAR to include further details on the responsibilities, interfaces, and authorities of the principal participants of the plant staff as they relate to the initial test program as described in the SRP. In response to this RAI, UniStar indicated that the plant staff is not responsible for managing or executing the initial test program, that the use of plant staff employees during Phases I through IV is intended to be within their-normal site-specific activities and qualifications during plant operation, and that if they were used in a startup engineer role, they would be required to meet those stated qualifications.

While the NRC staff understands UniStar's position that the use of plant staff employees during Phases I through IV is intended to be within their-normal site-specific activities and qualifications during plant operation, UniStar should address the following topics in the CCNPP3 application or justify their exclusion:

- 1) Each manager that provides personnel to complete the ITP should have a statement in their position description that they will provide personnel to complete the ITP.
- 2) It should be stated that during the performance of preoperational or startup test, whether the preoperational/start-up engineers will be responsible for running the test with plant personnel acting in a support role, or if a different chain of command will be established.
- 3) During the execution of the ITP, it should be stated whether the start-up group or operations has the ultimate authority over the ITP.
- 4) The description of the engineering manager's responsibilities should include that the engineering manager is part of TRT.
- 5) Which organization has responsibility for fuel loading during the ITP?
- 6) Identify who will manage the workload of plant staff performing ITP with other duties.
- 7) Identify and describe the controls that will be in place to manage the workload of plant staff performing ITP with other duties.