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May 18, 2009

UN#09-241

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. 102, Initial Plant Test Program

Reference: John Rycyna (NRC) to Robert Poche (UniStar Nuclear Energy), "RAI No 102
CQVP 2100.doc (PUBLIC)" email dated April 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 Energy, dated April 20, 2009 (Reference). This RAI addresses Initial Plant Test Program, as discussed in Section 14.2 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. 102, Questions 14.02-39 and 14.02-40, and includes revised COLA content. A Licensing Basis Document Change Request has been initiated to incorporate these changes into a future revision of the COLA. Our response to Questions 14.02-39 and 14.02-40 does not include any new regulatory commitments.

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

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

Executed on May 18, 2009



Greg Gibson

Enclosure: Response for Request for Additional Information RAI No. 102, Questions 14.02-39 and 14.02-40 Initial Plant Test Program, Calvert Cliffs Nuclear Power Plant Unit 3

cc: John Rycyna, NRC Project Manager, U.S. EPR COL Application
Laura Quinn, 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

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Enclosure

**Response for Request for Additional Information
RAI No. 102, Questions 14.02-39 and 14.02-40 Initial Plant
Test Program, Calvert Cliffs Nuclear Power Plant Unit 3**

RAI 102

Question 14.02-39

In RAI 14.02-14, the NRC staff requested that UniStar revise section 14.2.2 to describe the education, training, qualification, and experience requirements for organizations responsible for the conduct of preoperational and startup tests, and for organizations that will develop testing, operating, and emergency procedures; and include a general description regarding the development of a training program for each functional group of employees in the organization relative to the schedule for preoperational testing and initial startup testing to ensure that the necessary plant staff is ready to begin the test program.

In response to the staff's request, UniStar stated that the education and experience requirements for AREVA personnel preparing test procedures are equivalent to those specified for the startup and preoperational test engineer position. However, this statement was not added to the FSAR mark-up provided with the RAI response.

The NRC staff requests that UniStar revise section 14.2.2 to include the statement that the education and experience requirements for AREVA personnel preparing test procedures are equivalent to those specified for the startup and preoperational test engineer position.

Response

FSAR Section 14.2.2 will be revised to include a statement that the education and experience requirements for AREVA personnel preparing test procedures are equivalent to those specified for the startup and preoperational test engineer position, except that U.S. EPR design experience will be considered equivalent to power plant and nuclear plant experience for the AREVA personnel preparing test procedures.

ANSI/ANS 3.1-1993 specifies that Startup and Preoperational Test Engineers shall be knowledgeable of 1) test program administration, 2) design and operational performance requirements of the systems and equipment being tested, and 3) interaction between systems. Use of U.S. EPR design experience in lieu of power plant and nuclear plant experience for AREVA personnel preparing test procedures is acceptable because U.S. EPR design experience is directly applicable to preparation of test procedures and will ensure that the special knowledge requirements in the ANSI standard are met.

COLA Impact

FSAR Section 14.2.2 will be supplemented as follows in a future COLA revision:

14.2.2 ORGANIZATION AND STAFFING

AREVA Site Startup Organization

Qualification and Training

The education and qualification requirements for the Startup Manager, Startup Engineer, and Preoperational Test Engineer positions are consistent with the ANS-3.1 Function Position specified in Table 13.1-1.

The education and experience requirements for AREVA personnel preparing test procedures are equivalent to those specified for the startup and preoperational test engineer position, except that U.S. EPR design experience is considered equivalent to power plant and nuclear plant experience for AREVA personnel preparing test procedures.

Training and qualification of other plant staff (i.e. instrument, chemistry, computer, radiation protection, and maintenance personnel) assigned to support the Startup Organization continue to be managed by their line organization. They perform duties inline with their normal training and qualification programs at the direction of the Startup Manager's organization and in support of the startup test program.

Question 14.02-40

In RAI 14.02-18, the NRC staff requested that UniStar revise section 14.2.14.1 to include pressure testing and leak testing of the Raw Water Supply System. In response to this RAI, UniStar stated that the Raw Water Supply System should undergo pressure testing during the post-construction period to ensure system integrity, as stated in Section 9.2.9.5; however, the proposed mark-up did not include this change. Please revise section 14.2.14.1 to include pressure testing and leak testing of the Raw Water Supply System consistent with the RAI response, or justify its exclusion.

Response

In response to RAI No. 28 Question 14.02-18¹, it was stated that the "Raw Water Supply System should undergo pressure testing during the post-construction period to ensure system integrity, as stated in Section 9.2.9.5. The proposed markup of Section 14.2.14.1 is provided in the attachment to this RAI response." Section 14.2.14.1 will be revised to indicate that inspection and testing requirements will be completed as described in 9.2.9.5.

COLA Impact

FSAR Section 14.2.14.1 will be supplemented as follows in a future COLA revision:

14.2.14.1 Raw Water Supply System

2. PREREQUISITES

- k. RWSS inspection and testing requirements have been completed as described in Section 9.2.9.5.

¹ UniStar Nuclear Energy Letter UN#08-095 from Greg Gibson to Document Control Desk, "RAI No. 28, Revision 2, Questions 14.02-14 through 14.02-24, Initial Plant Test Program" dated December 22, 2008 (ML083650127)