

PMSTPCOL PEmails

From: Joseph, Stacy
Sent: Wednesday, May 13, 2009 4:46 PM
To: 'gscashell@stpegs.com'
Cc: Foster, Rocky; STPCOL
Subject: DRAFT RAI Related to SRP Section 14.02
Attachments: RAI 2386.doc

Steve,

Please see the attached DRAFT RAIs related to the Start-Up Administrative Manual. If you need a telecon to ensure STP's understanding of the RAI is clear, please contact Rocky Foster at 301-415-5787. If not, please let me know and I will issue the RAI.

Thank you,

Stacy Joseph
Project Manager
USNRC

Hearing Identifier: SouthTexas34Public_EX
Email Number: 1229

Mail Envelope Properties (CEEA97CC21430049B821E684512F6E5ECA3B25153C)

Subject: DRAFT RAI Related to SRP Section 14.02
Sent Date: 5/13/2009 4:46:13 PM
Received Date: 5/13/2009 4:46:14 PM
From: Joseph, Stacy

Created By: Stacy.Joseph@nrc.gov

Recipients:

"Foster, Rocky" <Rocky.Foster@nrc.gov>

Tracking Status: None

"STPCOL" <STP.COL@nrc.gov>

Tracking Status: None

"gscashell@stpegs.com" <gscashell@stpegs.com>

Tracking Status: None

Post Office: HQCLSTR01.nrc.gov

Files	Size	Date & Time
MESSAGE	320	5/13/2009 4:46:14 PM
RAI 2386.doc	32834	

Options

Priority: Standard

Return Notification: No

Reply Requested: No

Sensitivity: Normal

Expiration Date:

Recipients Received:

Request for Additional Information No. 2386 Revision 2

South Texas Project Units 3 and 4
South Texas Project Nuclear Operating Co
Docket No. 52-012 and 52-013

SRP Section: 14.02 - Initial Plant Test Program - Design Certification and New License Applicants
Application Section: 14.2.13.2

QUESTIONS for Quality and Vendor Branch 2 (ESBWR/ABWR) (CQVB)

14.02-***

RG 1.68, Revision 3, states, "Some preoperational tests completed as part of the Initial Test Program (ITP) cover certain ITAAC completed prior to fuel load. For example, testing performed to demonstrate that safety-related SSCs will perform satisfactorily in service must be conducted under a program that satisfies Criterion XI, "Test Control," of Appendix B to 10 CFR Part 50, and may also satisfy testing required by the ITAAC process." The scope of the ITP, however, is not limited solely to safety-related SSCs. Consequently, this guide specifies the scope of plant SSCs to be tested to satisfy the requirements of GDC 1, "Quality Standards and Records" (as specified in Appendix A to 10 CFR Part 50), as well as the quality assurance criteria set forth in Appendix B to 10 CFR Part 50." In addition, Section II.3.E.v of NUREG-0800 Section 14.2 states that the applicant should include provisions to ensure that retesting required for modifications or maintenance remains in compliance with inspections, tests, analyses, and acceptance criteria requirements.

Based on the information in RG1.68 and NUREG-0800 above, the staff requests that STP update U7-P-SU01-0001, STP Unit 3&4 Startup Administration Manual (SAM), Revision 1, Page 32, Section 4.6.1.3, Acceptance Criteria, South Texas Project Nuclear Operating Company (STPNOC) to add information to describe the administrative controls necessary to ensure that retesting required for modifications or maintenance remains in compliance with the inspections, tests, analyses and acceptance criteria (ITAAC) requirements.

14.02-***

In U7-P-SU01-0001, STP Unit 3&4 SAM, Page 38, Section 4.8.1, Test Procedure Change Notices (TPCN), under major TPCN, STPNOC must address a 50.59 like process for major TPCNs for Part 52 plants.

In accordance with 50.59(c)(1), a licensee may make changes to test procedures as described in the FSAR without obtaining a license amendment only if, the change to the technical specifications (TS)

incorporated in the license is not required, and if the change, test or experiment does not meet any of the criteria in 50.59(c)(2).

For major TPCNs, the staff requests that STPNOC add a requirement to SAM Section 4.8.1 for COLs to evaluate and obtain a license amendment if it is revealed that a major TPCN requires a change to the TS in accordance with 10 CFR 50.59(c)(1) and meets any one of eight criteria in 10 CFR 50.59(c)(2)(i) through (viii).

For additional information on 50.59 like change processes that affect the ABWR, refer to NRC Federal Register Notice (FRN), Licensees, Certifications and Approvals, dated August 28, 2007, Appendix A to Part 52, Rulemaking for the U.S. Advanced Boiling Water Reactor, Section VIII, Processes for Changes and Departures, Sub-sections VIII.5a, VIII.5b, VIII.5c, VIII.5d, VIII.5e and VIII.5f, Pages 49546 through 49547.

14.02-***

RG 1.68, Revision 3, states, "The scope of the ITP is not limited solely to safety-related SSCs. Consequently, this guide specifies the scope of plant SSCs to be tested to satisfy the requirements of GDC 1, "Quality Standards and Records" (as specified in Appendix A to 10 CFR Part 50), as well as the quality assurance criteria set forth in Appendix B to 10 CFR Part 50. While all SSCs important to safety are required to be tested, all of them need not be tested to the same stringent requirements. Specifically, GDC 1 requires, in part, that SSCs important to safety shall be tested to quality standards commensurate with the importance of the safety functions to be performed. A graded approach is also inherent in the testing requirements of Criterion XI of Appendix B to 10 CFR Part 50."

Based on the above information in RG 1.68, the staff found that STPNOC did not address in the Startup Administration Manual (SAM) non-safety-related important to safety SSCs to be included in the preoperational and initial startup test programs (for example, the scope of the reliability assurance program could include non-safety-related SSCs that are important to safety).

The staff requests that STP revise U7-P-SU01-0001, "STP Unit 3&4 Startup Administration Manual," Revision 1, page 47, Section 6.3, "Regulations and Regulatory Requirements," to address non-safety-related SSCs that are important to safety. Examples of non-safety-related SSCs that are important-to-safety include the fire protection system, environmental qualification (EQ) of electrical equipment important to safety, the alternate rod injection system used to mitigate anticipated transients without scram, and non-safety related station blackout power sources (e.g., combustion turbine generators) used to meet the station blackout rule.

The staff also requests that STPNOC add 10 CFR 50.48, 10 CFR 50.49, and 10 CFR 50.62 to U7-P-SU01-0001, Section 6.3.1, "U.S. Code of

Federal Regulations (CFR)," as these regulations relate to important to safety SSCs. The list of CFRs above may not be inclusive and the staff requests that STPNOC include any other rules that apply to non-safety-related SSCs that are important to safety.

14.02-***

RG 1.68, Revision 3, requires each new applicant for an advanced plant to identify all new first-of-a-kind (FOAK) tests. The staff requests that STPNOC provide guidance for new FOAK tests in the SAM for those SSCs within the scope of the ABWR standard design. For example, as identified in the South Texas Project (STP) Unit 3&4 COLA FSAR Section 14.2S.2, "First of a Kind Systems," the reactor recirculation and control rod drive systems require preoperational and startup FOAK tests. These systems, among others that require FOAK tests, are within the scope of the ABWR design certification. The staff requests that STPNOC identify new FOAK tests for SSCs within the scope of the ABWR standard design in the SAM.