BellBendCOLPEm Resource

From: Canova, Michael
Sent: Tuesday, May 26, 2009 7:56 AM
To: 'Sgarro, Rocco R'; 'BBNPP@pplweb.com'; 'jennifer.mcqueeney@unistarnuclear.com'; 'Katie.Thurstin@unistarnuclear.com'
Cc: BellBendCOL Resource; Colaccino, Joseph; Scarbrough, Thomas; Terao, David; Miernicki, Michael; Weisman, Robert
Subject: RE: Bell Bend COLA - Draft Request for Information No. 10 (RAI No.10)- CIB1 - 2387
Attachments: Letter 10 RAI 2387 CIB1.doc

Attached is DRAFT RAI No. **10** for the Bell Bend COL Application. You have ten working days to review this request and to decide whether you need a conference call to discuss it. Please notify my of your decision in this regard.

After the call, or after ten days, the RAI will be finalized and sent to you. You will then have 30 days to respond. These durations are factored into your review schedule. If additional time is required to respond, please inform me of your proposed schedule to respond at your earliest opportunity.

If you have any questions, please contact me.

Michael A. Canova
Project Manager - Bell Bend COL Application
Docket 52-039
EPR Project Branch
Division of New Reactor Licensing
Office of New Reactors
301-415-0737

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From: Canova, Michael

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Letter 10 RAI 2387 CIB1.doc	33786	

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Request for Additional Information No. 2387 Revision 0
DRAFT
5/22/2009

Bell Bend
PPL Bell Bend LLC.
Docket No. 52-039
SRP Section: 03.09.06 - Functional Design Qualification and Inservice Testing Programs for Pumps, Valves, and Dynamic Restraints
Application Section: 3.9.6

QUESTIONS for Component Integrity, Performance, and Testing Branch 1 (AP1000/EPR Projects) (CIB1)

03.09.06-1

Section 3.9.6, "Functional Design, Qualification, and Inservice Testing Programs for Pumps, Valves, and Dynamic Restraints," in the Bell Bend EPR S-COLA FSAR, incorporates by reference the U.S. EPR Design Certification FSAR, and also provides plant-specific information on the Essential Service Water Emergency Makeup System (ESWEMS) for the Bell Bend Nuclear Power Plant (BBNPP). Bell Bend EPR S-COLA FSAR Subsection 3.9.6.1, "Functional Design and Qualification of Pumps, Valves, and Dynamic Restraints," provides general statements regarding the functional design and qualification of ESWEMS components, and states that there are no snubbers incorporated into the ESWEMS at BBNPP. With respect to the inservice testing (IST) program for ESWEMS pumps and valves, the Bell Bend EPR S-COLA FSAR states that Tables 3.9-1 and 2 identify additional site-specific ESWEMS pumps and valves, respectively, that are included within the scope of the IST program.

Please provide additional information regarding the application of the provisions for the functional design, qualification, and IST programs for pumps and valves, which are specified in the EPR Design Certification FSAR Section 3.9.6 and the Calvert Cliffs Unit 3 R-COLA FSAR Section 3.9.6, to the ESWEMS pumps and valves identified in Tables 3.9-1 and 2 of the Bell Bend EPR S-COLA FSAR.

Bell Bend EPR S-COLA FSAR Subsection 3.9.6.3, "Inservice Testing Programs for Valves," states that the ESWEMS Class 3 site-specific valves will be tested in accordance with ASME OM Code 2004, section ISTC, but does not address the other provisions of the EPR Design Certification FSAR and Calvert Cliffs Unit 3 R-COLA FSAR for IST and motor-operated valve (MOV) testing operational programs. Please confirm that the functional design, qualification, and IST (including MOV testing) programs in the EPR Design Certification FSAR and Calvert Cliffs Unit 3 R-COLA FSAR will be applied to the ESWEMS pumps and valves at BBNPP, or describe plant-specific functional design, qualification, and IST (including MOV testing) programs that will be implemented at BBNPP in these technical areas for the ESWEMS pumps and valves.

The Calvert Cliffs Unit 3 EPR R COLA FSAR, Section 3.9.6, describes an Ultimate Heat Sink (UHS) Makeup Water System as a site-specific safety-related system that is subject to PST and IST program requirements identified in 10 CFR

50.55a. Please revise the Bell Bend FSAR to clarify the applicability (if any) of a UHS Makeup Water at the BBNPP, and provide additional information on the PST and IST programs that will be used.

03.09.06-2

Table 3.9-2, "Site-Specific Inservice Valve Testing Program Requirements," in the Bell Bend EPR S-COLA FSAR, provides IST provisions for the ESWEMS valves. As part of its review of the IST table in the U.S. EPR Design Certification FSAR the NRC staff requested additional information regarding the indication of stroke-time and fail-safe testing as part of exercise testing, and justification for a passive designation for valves having both open and closed safety positions. For individual ESWEMS valves in Bell Bend EPR S-COLA FSAR Table 3.9-2, where applicable, specify the performance of stroke-time testing and fail-safe testing, and identify active valves having open and closed safety positions.

03.09.06-3

Bell Bend EPR S-COLA FSAR Table 3.9-2 identifies the Train 4 ESWEMS Pump Discharge Check Valve (Valve Identification Number 10GFA40-AA001) as a passive valve. Check valves are considered active valves for the purpose of the IST program at operating nuclear power plants. Provide justification for the classification of the Train 4 ESWEMS Pump Discharge Check Valve as a passive valve, or reclassify this and other check valves to be included in the Bell Bend IST program as active valves.

03.09.06-4

Note 10 in Bell Bend EPR S-COLA FSAR Table 3.9-2 states that table entries for ESWEMS manual valves will be developed during detailed design engineering. U.S. EPR Design Certification FSAR Tier 2, Table 3.9.6-2, "Inservice Valve Testing Program Requirements," includes table entries for manual valves in other EPR systems. Please provide additional information on the ESWEMS manual valves in Bell Bend EPR S-COLA FSAR Table 3.9-2 consistent with the IST program description in the U.S. EPR Design Certification FSAR, or justify the deferral of IST program information for the ESWEMS manual valves.

03.09.06-5

The last sentence of Bell Bend EPR S-COLA FSAR Section 3.9.6 (at top of page 3-207) states that the implementation milestones for the preservice testing (PST) and inservice testing (IST) programs shall be consistent with the requirements in the latest edition and addenda of the OM Code incorporated by reference in 10 CFR 50.55a (CFR, 2008) on the date 12 months before the date for initial fuel load. The NRC staff requests that the Bell Bend FSAR be revised to remove the reference to a specific year of the CFR.