

CCNPP3COLA PEmails

From: Rycyna, John
Sent: Monday, June 15, 2009 3:51 PM
To: Poche, Robert; katie.thurstin@unistarnuclear.com; McQueeney, Jennifer; michael.stevenson@unistarnuclear.com
Cc: CCNPP3COL Resource; Kavanagh, Kerri; Peralta, Juan; Roy, Tarun; Biggins, James; Simon, Marcia; Vrahoretis, Susan; Colaccino, Joseph
Subject: Draft RAI No 120 CQVP 2262.doc
Attachments: Draft RAI No 120 CQVP 2262.doc

Rob,

Attached is DRAFT RAI No. 120. You have until June 29, 2009 to review it and to decide whether you need a conference call to discuss it. After the call or after June 29, 2009 the RAI will be finalized and sent to you. You then have 30 days to respond.

John Rycyna, PE
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Office of New Reactors
U.S. Nuclear Regulatory Commission
301-415-4122

Hearing Identifier: CalvertCliffs_Unit3Cola_Public_EX
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Subject: Draft RAI No 120 CQVP 2262.doc
Sent Date: 6/15/2009 3:50:44 PM
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From: Rycyna, John

Created By: John.Rycyna@nrc.gov

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MESSAGE	434	6/15/2009 3:50:47 PM
Draft RAI No 120 CQVP 2262.doc		29294

Options

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

Request for Additional Information No. 120
DRAFT
6/15/2009

Calvert Cliffs Unit 3
UniStar
Docket No. 52-016

SRP Section: 17.5 - Quality Assurance Program Description - Design Certification, Early Site Permit
and New License Applicants
Application Section: UniStar Quality Assurance Program Description Topical Report

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

17.5-3

Revision 1 to UniStar Topical Report No. UN-TR-06-001-A, Section D, "Procurement Document Control," proposed to add the following:

Additionally 10 CFR 50.55 "Conditions of construction permits, early site permits, combined licenses, and manufacturing licenses, " paragraph (e) is imposed on suppliers of QA Level 1 materials and services until approval of the operating license by the NRC in accordance with 10 CFR 52.103(g), "Operation under a combined license."

The NRC staff notes that not all of the requirements in 50.55(e) are applicable to suppliers of basic components. Section D already correctly invokes 10 CFR Part 21 "during siting, design, fabrication, construction, and testing for QA Level 1 procurement or dedication of items and services including the dedication of items or services used to satisfy the requirements of 10 CFR 50, Appendix B." Please explain why the addition of 50.55(e) requirements is necessary or delete the statement.

17.5-4

UniStar Nuclear Topical Report No. UN-TR-06-001-A, Revision 1, "Quality Assurance Program Description," describes how the quality assurance requirements of Appendix B to 10 CFR Part 50 will be implemented. The regulatory guides identified below provide methods acceptable to the staff for describing in the QAPD how the subject requirements of Appendix B to 10 CFR Part 50 will be met. UN-R-06-001-A should commit to these regulatory guides or provide justification of any proposed alternatives. Exceptions to methods described by these regulatory positions should be explicitly addressed in UN-TR-06-001-A with justification with detail sufficient for the staff to evaluate compliance with the requirements of Appendix B to 10 CFR Part 50. Further, UN-TR-06-001-A should be revised to clarify that changes to regulatory commitments described in the QAPD or incorporated by reference are subject to the change process defined by 10 CFR 50.54(a).

a. RG 1.8, Rev. 3, May 2000, "Qualification and Training of Personnel for Nuclear Power Plants"

This regulatory guide provides guidance acceptable to the NRC staff for complying with the personnel training and qualification requirements of 10 CFR

Part 50, Section 50.120f. RG 1.8, Rev. 3 finds ANSI/ANS-3.1-1993 subject to the Regulatory Position established in Section C to provide an acceptable method for meeting requirements for training and qualification of nuclear power plant personnel. Section C exceptions include conditions applicable to personnel performing activities within the scope of the quality assurance program described in NEI 06-14A.

b. RG 1.28, Rev. 3, August 1985, "Quality Assurance Program Requirements (Design and Construction)"

This regulatory guide describes a method acceptable to the NRC staff for complying with the provisions of Appendix B to 10 CFR Part 50 with regard to establishing and implementing the requisite quality assurance program for the design and construction of nuclear power plants. RG 1.28, Rev. 3 finds NQA-1-1983 subject to the Regulatory Position established in Section C to provide an acceptable method for use in implementing the requirements of Appendix B to 10 CFR Part 50 during the design and construction phase.

c. RG 1.33, Rev. 2, February 1978, "Quality Assurance Program Requirements (Operations)"

This regulatory guide describes a method acceptable to the NRC staff for complying with the provisions of Appendix B with regard to overall quality assurance program requirements for the operation of nuclear power plants. RG 1.33 finds ANSI N18.7-1976/ANS 3.2 to provide an acceptable basis for overall quality assurance compliance with Appendix B to 10 CFR Part 50 subject to the Regulatory Position established in Section C.

17.5-5

The use of the term "Guidance" in Section 17.5, "Quality Assurance Program Guidance" of the CCNPP Unit 3 FSAR is misleading as provisions described therein are requirements not guidance. Please insert the term "Requirements" in lieu of "Guidance" to identify Section 17.5 of the CCNPP Unit 3 FSAR. A similar request will be forwarded to AREVA to make a conforming revision to Section 17.5 of the U.S. EPR FSAR.