

PMComanchePeakPEm Resource

From: Monarque, Stephen
Sent: Friday, June 26, 2009 4:03 PM
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Cc: ComanchePeakCOL Resource; Willingham, Michael
Subject: Comanche Peak RAI 2353 (RAI # 8)
Attachments: RAI 2353 (RAI 8).doc

The NRC staff has identified that additional information is needed to continue its review of the combined license application. The staff's request for additional information (RAI) is contained in the attachment. Within five calendar days of the date of this letter, please indicate if you wish to have a conference call.

The response to this RAI is due within 35 calendar days of June 26, 2009.

Note: If changes are needed to the safety analysis report, the NRC staff requests that the RAI response include the proposed wording changes.

thanks,

Stephen Monarque
U. S. Nuclear Regulatory Commission
NRO/DNRL/NMIP
301-415-1544

Hearing Identifier: ComanchePeak_COL_Public
Email Number: 308

Mail Envelope Properties (3DF2506A7257014AAC5857E5E852DEAC075720A95A)

Subject: Comanche Peak RAI 2353 (RAI # 8)
Sent Date: 6/26/2009 4:03:00 PM
Received Date: 6/26/2009 4:03:01 PM
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Post Office: HQCLSTR02.nrc.gov

Files	Size	Date & Time
MESSAGE	678	6/26/2009 4:03:01 PM
RAI 2353 (RAI 8).doc	32250	

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Priority: Standard
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Sensitivity: Normal
Expiration Date:
Recipients Received:

Request for Additional Information (RAI #8) No. 2353

6/26/2009

Comanche Peak Units 3 and 4
Luminant Generation Company, LLC.
Docket No. 52-034 and 52-035

SRP Section: 05.03.02 - Pressure-Temperature Limits, Upper-Shelf Energy, and Pressurized Thermal Shock

Application Section: 05.03.02

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

05.03.02-2

Based on the response by Mitsubishi Heavy Industries, Ltd.(MHI) to RAI 2334 (NRC accession number ML091170079), it is NRC's understanding that MHI will submit a generic pressure and temperature limits report (PTLR) using the bounding material properties and projected fluence as part of the US-APWR Design Certification. On this basis, the NRC staff requests that Comanche Peak Units 3 & 4 combined license (COL) application (COLA) Final Safety Analysis Report (FSAR), COLA Item 5.3(1) be revised to add a statement that addresses the submittal of plant-specific pressure – temperature (P-T) limits. For example, COLA Item 5.3(1) could be revised to state:

The COL Holder shall update the P/T limits prior to fuel loading using the PTLR methodologies approved in the US-APWR DCD and the plant-specific material properties. The COL Holder will inform the NRC of the updated P/T limits.

This approach is consistent with the NRC Generic Letter 96-03 (January 31, 1996), which provides a method for the licensee to inform the NRC of any subsequent change in P-T limits without a requirement for NRC approval, if there are no changes to the approved PTLR methodology.

05.03.02-3

In response to RAI 2317 (ML091250488), the applicant agreed to provide the plant-specific pressurized thermal shock (PTS) evaluation within 12 months after acceptance of the reactor vessel. The applicant also agreed and stated that this commitment will be included as part of the proposed license condition identified in Table 13.4-201, "Operational Programs Required by NRC Regulation and Program Implementation," Item 5, "Reactor Vessel Material Surveillance Program" (RVSP). The NRC staff found that the applicant's proposed milestone for submitting the PTS evaluation to the NRC is acceptable. However, the submittal of RT_{PTS} values is not related to the RVSP or any other operational program described in Review of Operational Programs in a Combined License Application and Generic Emergency Planning Inspections, Tests, Analyses, and Acceptance Criteria, SECY 05-0197 (Oct. 28, 2005). Thus, including this commitment

as part of a license condition identified in Table 13.4-201 may not be appropriate (particularly under Item 5).

The NRC staff notes that it might be more appropriate to put the license condition, which states that the plant-specific PTS evaluation will be submitted to the NRC within 12 months after acceptance of the reactor vessel, in COLA Part 10, Section 2, "Inspections, Tests, Analyses And Acceptance Criteria (ITAAC) And Proposed License Conditions". Please provide justification for placing the license condition in Table 13.4-201, or revise the COLA to remove this license condition from Table 13.4-201, and, instead, provide it in Part 10, Section 2, of the COLA.