

PMComanchePeakPEm Resource

From: Monarque, Stephen
Sent: Sunday, July 12, 2009 8:42 PM
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Cc: ComanchePeakCOL Resource; Reyes, Ruth
Subject: Comanche Peak RCOL RAI 13, Section 6.1.2
Attachments: RAI 2805 (RAI 13).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 42 calendar days of July 12, 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
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Options

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Request for Additional Information (RAI) No. 2805 Revision 0

RAI #13

7/12/2009

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

SRP Section: 06.01.02 - Protective Coating Systems (Paints) - Organic Materials
Application Section: 6.1.2

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

06.01.02-1

Background

In order to ensure compliance with 10CFR 50 Appendix B, NUREG-0800 Standard Review Plan (SRP) Section 6.1.2 provides as the SRP acceptance criteria that a coating system to be applied inside a containment is acceptable if it meets the regulatory positions of Regulatory Guide 1.54 "Service Level I, II, and III Protective Coatings Applied to Nuclear Power Plants," Revision 1, July 2000, and the standards of ASTM D5144-00 and ASTM D3911-03. SRP Section 6.1.2 states that an applicant is required to identify differences between the design features, analytical techniques, and procedural measures proposed for its facility and the SRP acceptance criteria and evaluate how the proposed alternatives to the SRP acceptance criteria provide acceptable methods of compliance with the NRC regulations. The Comanche Peak Nuclear Power Plant combined license application FSAR Section 6.1 incorporated by reference the US-APWR design certification document (DCD) FSAR Section 6.1, including Section 6.1.2 which briefly describes the protective coatings to be applied in containment. US-APWR FSAR Section 6.1.2 states that "With rare and minor exception (e.g., protective coatings on trim pieces, faceplates, and covers) coatings used inside containment are applied in accordance with RG 1.54." However, RG 1.54 states that ASTM D 5144-00 and the other ASTM standards (listed in the regulatory guide) provide guidance on practices and programs that are acceptable to the NRC staff for the selection, application, qualification, inspection, and maintenance of protective coatings applied in nuclear power plants. The US-APWR DCD does not address the standards to be applied to selection, qualification, inspection, or maintenance of the protective coatings. Also, it is important that the protective coatings program is implemented prior to construction so that selection, procurement, and initial application of coatings will be controlled by the appropriate standards.

Requested Information

Luminant is requested to provide a description of the protective coatings program to be implemented at Comanche Peak Nuclear Power Plant, including the following information:

1. A list of the standards to be applied to selection, qualification, inspection, and maintenance of protective coatings, or confirm that these standards will consist of those endorsed by RG 1.54. If standards other than those endorsed by RG 1.54 will be used, justify the use of the alternate standards.
2. The administrative controls to be applied to the program.
3. Provide the schedule for full implementation of the coatings program with respect to major milestones in the construction of the plant; for example, prior to application of coatings, prior to preparation of surfaces to be coated, or prior to procurement of coatings materials.