PMLevyCOLPEm Resource

From: Comar, Manny
Sent: Sunday, March 01, 2009 11:44 AM
To: Kitchen, Robert; Waters, David; Wilkins, Tillie
Cc: Comar, Manny; LevyCOL Resource
Subject: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 10 RELATED TO SRP SECTION 17.5 FOR THE LEVY COUNTY UNITS 1 AND 2 COMBINED LICENSE APPLICATION
Attachments: Levy_ltr-10_rai1914.pdf

All:

Attached is the RAI letter No.10 related to SRP Section 17.5 for the LEVY COUNTY NUCLEAR PLANT UNITS 1 and 2 Combined License Application.

The Accession number is ML090580609

If you have any further questions, please feel free to contact me. Thanks

Manny Comar
Senior Project Manager
NRO/DNRL/NWE1
Nuclear Regulatory Commission
301-415-3863
mailto:manny.comar@nrc.gov

Hearing Identifier: Levy_County_COL_Public
Email Number: 318

Mail Envelope Properties (3AF7DEF82ADA8944AD8247B7ED7FD65182B368450A)

Subject: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 10 RELATED TO SRP SECTION 17.5 FOR THE LEVY COUNTY UNITS 1 AND 2 COMBINED LICENSE APPLICATION
Sent Date: 3/1/2009 11:43:37 AM
Received Date: 3/1/2009 11:43:39 AM
From: Comar, Manny

Created By: Manny.Comar@nrc.gov

Recipients:
"Comar, Manny" <Manny.Comar@nrc.gov>
Tracking Status: None
"LevyCOL Resource" <LevyCOL.Resource@nrc.gov>
Tracking Status: None
"Kitchen, Robert" <robert.kitchen@pgnmail.com>
Tracking Status: None
"Waters, David" <David.Waters@pgnmail.com>
Tracking Status: None
"Wilkins, Tillie" <tillie.wilkins@pgnmail.com>
Tracking Status: None

Post Office: HQCLSTR01.nrc.gov

Files	**Size**	**Date & Time**
MESSAGE	458	3/1/2009 11:43:39 AM
Levy_ltr-10_rai1914.pdf	145909	

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

LevyCountyRAIsPEm Resource

From: Manny Comar
Sent: Friday, February 27, 2009 4:50 PM
To: LevyCountyRAIsPEm Resource
Subject: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 10 RELATED TO SRP SECTION 17.5 FOR THE LEVY COUNTY UNITS 1 AND 2 COMBINED LICENSE APPLICATION
Attachments: LEVY-RAI-LTR-010.doc

Hearing Identifier: Levy_County_COL_eRAIs
Email Number: 11

Mail Envelope Properties (3AF7DEF82ADA8944AD8247B7ED7FD65182B36844A5)

Subject: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 10 RELATED TO SRP SECTION 17.5 FOR THE LEVY COUNTY UNITS 1 AND 2 COMBINED LICENSE APPLICATION
Sent Date: 2/27/2009 4:50:11 PM
Received Date: 2/27/2009 4:50:12 PM
From: Manny Comar

Created By: Manny.Comar@nrc.gov

Recipients:
"LevyCountyRAIsPEm Resource" <LevyCountyRAIsPEm.Resource@nrc.gov>
Tracking Status: None

Post Office: HQCLSTR01.nrc.gov

Files	**Size**	**Date & Time**
MESSAGE	13	2/27/2009 4:50:12 PM
LEVY-RAI-LTR-010.doc	69114	

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

February 27, 2009

Mr. Garry Miller
General Manager, Nuclear Plant Development
Progress Energy Florida, Inc.
PO Box 1551
411 Fayetteville Street Mall
Raleigh, NC 27602

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION LETTER NO.10 RELATED TO SRP SECTION 17.5 FOR THE LEVY COUNTY NUCLEAR PLANT UNITS 1 AND 2 COMBINED LICENSE APPLICATION

Dear Mr. Miller:

By letter dated July 28, 2008, as supplemented by a letter dated September 12, 2008, Progress Energy Florida, Inc. submitted its application to the U. S. Nuclear Regulatory Commission (NRC) for a combined license (COL) for two AP1000 advanced passive pressurized water reactors pursuant to 10 CFR Part 52. The NRC staff is performing a detailed review of this application to enable the staff to reach a conclusion on the safety of the proposed application.

The NRC staff has identified that additional information is needed to continue portions of the review. The staff's request for additional information (RAI) is contained in the enclosure to this letter.

To support the review schedule, you are requested to respond within 30 days of the date of this letter. If changes are needed to the final safety analysis report, the staff requests that the RAI response include the proposed wording changes.

If you have any questions or comments concerning this matter, you may contact me at 301-415-3863 or you may contact Brian Anderson, the lead project manager for the Levy County Nuclear Plant Units 1 and 2 combined license application at 301-415-9967.

Sincerely,

/**RA**/

Manny Comar, Project Manager
AP1000 Projects Branch 1
Division of New Reactor Licensing
Office of New Reactors

Docket Nos. 52-029
52-030

Enclosure:
Request for Additional Information

If you have any questions or comments concerning this matter, you may contact me at 301-415-3863 or you may contact Brian Anderson, the lead project manager for the Levy County Nuclear Plant Units 1 and 2 combined license application at 301-415-9967.

Sincerely,

/**RA**/

Manny Comar, Project Manager
AP1000 Projects Branch 1
Division of New Reactor Licensing
Office of New Reactors

Docket Nos. 52-029
52-030

eRAI Tracking No. 1914
Enclosure:
Request for Additional Information

Distribution:

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NRO-002

OFFICE	SFPT/BC	NWE1/L-PM	OGC	NWE1/L-PM
NAME	JPeralta*	MComar*	SBrock*	BAnderson*
DATE	1/13/09	1/28/09	2/06/09	2/17/09

*Approval captured electronically in the electronic RAI system.

OFFICIAL RECORD COPY

Request for Additional Information No. 1914

Levy County, Units 1 and 2
Progress Energy Florida, Inc.
Docket No. 52-029 and 52-030
SRP Section: 17.5 - Quality Assurance Program Description - Design Certification, Early Site Permit and New License Applicants
Application Section: 17.5

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

17.5-1

The Levy County Applicant has provided an S-COLA which should include applicable incorporation of Standard RAI responses associated with the Bellefonte R-COLA application. With respect to Chapter 17, Sections 17.1, 17.2, 17.3, and 17.5, the following standard R-COLA RAIs are applicable to the Levy County S-COLA application and require response.

BLN 17.05-05

BLN 17.05-06

BLN 17.05-07

BLN 17.05-09 + S

BLN 17.05-013

BLN 17.05-014

BLN 17.05-015

BLN 17.05-017

BLN 17.05-018

17.5-2

Organization (QAPD Part I, Section 1) FSAR Section 17.5 states that the QAPD is maintained as a separate document; whereas QAPD Part II, Section 1 states that organization charts for various departments/locations are contained in chapter 13 of the FSARs of the respective station. NEI 06-14A, “Quality Assurance Program Description,” referenced by FSAR Section 17.5, includes charts typical of the construction/preoperational phase.

Because the QAPD is a stand-alone document, periodically submitted for NRC review, it should include organization charts for the construction/preoperational phase and the operations phase. These charts should depict the flow of responsibilities from corporate positions responsible for quality-related programs to and including positions responsible for implementing and verifying elements of these

programs. Generic position titles, descriptive of position functions and supplemented by descriptive text, may be used.

The QAPD describes the functions and responsibilities associated with the quality assurance requirements of Appendix B, Criteria I, Organization, Criteria II, Quality Assurance, and the administrative requirements described by American National Standard Institute (ANSI) N18.7. All positions associated with the establishment, implementation, and verification of quality-related activities should be shown on the organization charts and described in the QAPD.

For the operations phase, the level of detail to be included should include roles, responsibilities, and lines of authority for the positions necessary to implement the requirements of N18.7. Comparable detail should be provided for the construction/preoperational phase.

The following clarifications are requested, specific to the submitted QAPD, Part II, Section 1:

Section 1: The title above the list of responsibilities states, "Responsibilities, Structure, Functions, and Interfaces (Construction Phase)." Please clarify if all of the titles and responsibilities under this title is for the construction phase only. Please include a list of titles and responsibilities for the procurement, pre-operations, and operations activities that are also controlled by the QAPD.

Section 1, Organization: It is stated that engineering, procurement, and construction services are provided by primary contractors. Please clarify whether these services are provided by a single contract, as suggested in the text, and also the method for determining the “applicable” requirements of the QA program.

Section 1.7, Quality Assurance and Oversight: Is the position of the “manager responsible for quality assurance and oversight” a corporate position or a plant position? The reporting relationships incumbent with this position are not described. Please clarify the oversight responsibilities of this position, including those associated with implementation of the independent review function, described in Section 2.6.

Section 1.7 states that the manager for quality assurance and oversight is responsible for “making periodic reports on the effectiveness” of the implementation of the QAPD. To whom are these reports distributed and for what purpose?

Section 1.13, Authority to Stop Work – Reference is made to “approved procedures.” If this reference pertains to the procedural controls described in Section 5, identify them as such. If these are other than procedures developed and controlled by Progress, describe the process for approving these procedures.

Section 1.14, QA Organizational Independence – What is the functional definition of “checking” and how does it differs from “verification.” Since it is stated that design activities are not checked, provided clarification of how the adequacy of design activities is assured.

17.5-3

The Progress QAPD Section 2 states that the QAPD applies to those quality-related activities that involve the functions of safety-related activities of structures, systems, and components (SSCs) as described in the COL Final Safety Analysis Report. The staff notes that Appendix B to 10 CFR Part 50 requires, in part, that Part 52 applicants include in the FSAR a description of the quality assurance

[program] applied to the design, and to be applied to the fabrication, construction, and testing of the SSCs of the facility and to the managerial and administrative controls to be used to assure safe operations. Please revise the language in this section to conform to this requirement. Also, the current language in this section seems to indicate that safety-related SSCs are described in the FSAR. Please indentify the corresponding FSAR section. Otherwise, please clarify the purpose of this text and/or modify it accordingly.

17.5-4

NEI 06-14A, Section 2.3, states that the COL application will be annotated to identify site-specific design basis activities. This section was omitted in the Levy County QAPD. The staff requests that Progress Energy identify the site-specific design basis activities consistent with the guidance in NEI 06-14A, or justify its omission.

17.5-5

NEI 06-14A states in Section 2, Quality Assurance Program, "For the COL applications, this QAPD applies to those [Nuclear Development] and [CA] activities that can affect either directly or indirectly the safety-related site characteristics or analysis of those characteristics. In addition, this QAPD applies to engineering activities that are used to characterize the site or analyze that characterization." Section 2 of the Progress QAPD omitted this paragraph. Please provide justification for this omission or revise the QAPD to follow the guidance in NEI 06-14A.

17.5-6

Chapter 17.1, "Quality Assurance During the Design and Contruction Phases," of the Levy County Final Safety Analysis Report (FSAR) states, in part, that the COL application development was conducted in accordance with the quality assurance requirements for the existing Progress Energy nuclear plants. However, Chapter 17.1 does not identify the QA program applied to design, procurement, and construction activities associated with the Levy County Units 1 & 2 COLA before the COL is issued. Please revise Chapter 17.1 accordingly.

Also, the NRC staff requests clarification on the expected scope of work related to Levy County COLA design and procurement activities from the time of docketing until the time the COL might be issued. In particular, please identify when and where these design and procurement activities will take place.

17.5-7

Chapter 17.1 of the Levy County FSAR states, in part, that the Quality Assurance Program Description (QAPD) discussed in Section 17.5 of the FSAR will become effective at COL issuance. Table 13.4-201, Operational Programs Required by NRC Regulations, states that the QA program – Operation, which is discussed in FSAR Section 17.5, will be implemented 30 days prior to the scheduled date for the initial loading of fuel. Since the QAPD discussed in Section 17.5 of the FSAR applies to the design, construction, and operations of Levy County Units 1 & 2, provide clarification as to when the QAPD discussed in FSAR Section 17.5 will be actually implemented.

17.5-8

Pursuant to 10 CFR 52.79(a)(41), COL applicants must provide an evaluation of the facility against the Standard Review Plan (SRP) revision in effect 6 months before the docket date of the application. Where differences exist, the applicant's evaluation must discuss how the proposed alternative provides

an acceptable method of complying with the Commission's regulations, or portions thereof, that underlie the corresponding SRP acceptance criteria. Regulatory Guide (RG) 1.206, Section C.I.17.5.3, states that COL applicants may use an existing QAPD that the NRC has approved for current use for either or both phases of its QAPD submittal, provided that the applicant identifies and justifies alternatives to, or differences from, the SRP in effect 6 months prior to the docket date of the application. Section 17.1 of the Levy County FSAR states that the existing Progress Energy 10 CFR Part 50, Appendix B Quality Assurance Program (NGGM-PM-0030) is used to provide oversight of the activities performed in support of the COL application development. Table 1.9-202, Conformance with SRP Acceptance Criteria, states that the FSAR Position is acceptable with regards to SRP 17.1. Pursuant to 10 CFR 52.79(a)(41), please provide the evaluation of the existing Progress Energy QA program against the acceptance criteria in SRP 17.1.

17.5-9

Part 1, Section 1.1 of the QAPD in Attachment 11, lists the activities affecting quality to which the QAPD applies. Although this list is not all-inclusive, siting is listed as an activity affecting quality to which the QAPD applies. Since the FSAR states that this QAPD would not become effective until COL issuance, the staff requests additional information to clarify how siting activities would be subject to the provisions in the QAPD.

17.5-10

Section 17.5 of the Levy County FSAR states that the QAPD is maintained as a separate document. Part II, Section 1 of the Levy County QAPD states, in part, that the organization charts for the various departments/organizations are contained in Chapter 13 of the respective station's FSARs and will describe organizational positions, relations and specific roles and responsibilities. Please clarify how the organizational charts provided in Chapter 13 of the Levy County FSAR describe the specific functions and responsibilities as well as how these organizational charts are consistent with the organization described in the QAPD. Also, please revise the organizational description in the QAPD to include the necessary organization charts for the construction/pre-operations organization and the operations organization consistent with their role as outlined in the QAPD.

17.5-11

Appendix 1AA of the Levy County FSAR lists Progress Energy's conformance with NRC Regulatory Guides (RGs) and provides any exceptions to conformance with those RGs. For those RGs that describe quality assurance-related requirements, Appendix 1AA appears to address the conformance of the QAPD provided in Part 11 of the COL application. However, since Progress Energy is relying on its existing quality assurance program for activities prior to COL issuance, please clarify how Appendix 1AA also addresses the existing Progress Energy quality assurance program's conformance to the applicable RGs, or justify an alternative approach.

17.5-12

Chapter 17.1 of the Levy County FSAR refers to (1) the Progress Energy Program Manual (NGGM-PM-0030) Quality Assurance Plan for New Nuclear Plant Development and Construction Activities and, (2) the CH2M HILL Quality Assurance Program Nuclear Business Group Quality Manual (NBG-QA-02-00). However, these documents are not listed in Section 17.8, "References." Please add all documents discussed in Section 17.1 of the Levy County COLA to the references in Section 17.8.

17.5-13

Regulatory Guide 1.28 (RG 1.28), Revision 3, "Quality Assurance Program Requirements (Design and Construction) 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 program for the design and construction of nuclear power plants. Please identify by specific title and revision (and add to the references section), the existing Progress Energy Quality Assurance Program described in Section 17.1 of the COL application and describe how the existing Progress Energy Quality Assurance Program described in Section 17.1 of the COL application satisfies the provisions in RG 1.28, or justify an alternative approach.