From:	Tai, Tom
Sent:	Monday, June 29, 2009 3:39 PM
To:	Agles, James
Cc:	STPCOL
Subject:	Draft RAI 3110 - Chapter 9.2.4
Attachments:	RAI 3110 09.02.04-xx.doc

Jim,

Attached for your information is a draft copy of RAI 3110 for Chapter 9.2.4. Please let me know if you need a conference call to discuss this draft before we issue. If you do not need a conference call, please let me know also such that I can issue immediately.

Regards

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South Texas Project Units 3 and 4
South Texas Project Nuclear Operating Co
Docket No. 52-012 and 52-013
SRP Section: 09.02.04 - Potable and Sanitary Water Systems
Application Section: Section 9.2.8

QUESTIONS for Balance of Plant Branch 1 (AP1000/EPR Projects) (SBPA)

09.02.04-***

Final Safety Analysis Report (FSAR) Section 9.2.8.3.6 states that makeup water preparation system (MWPS) failures, including those that result in flooding, will not result in the failure of safety-related structures, systems and components (SSCs). However, except for the provision to enclose much of the MWPS within the makeup water preparation (MWP) building which does not contain any safety-related SSCs, no discussion is provided for what other design provisions are necessary for protecting safety-related SSCs from MWPS failures that occur outside the MWP building. For example, flood barriers and site grading requirements that are necessary to prevent water from tank/basin failures from impacting safety-related SSCs are not described. Please explain how the requirements of GDC to are satisified, and revise the FSAR as necessary.

09.02.04-***

In order to demonstrate that the interface requirements specified in Tier 1 of the design control document (DCD), Section 4.3 are met, a site-specific inspection, test, analysis and acceptance criterion (ITAAC) was established for the MWPS in Part 9 of the combined license (COL) application, Section 3, "Site-Specific ITAAC." The description in Section 3 indicates that ITAAC for the MWPS are necessary due to its "safety-related, safety-significant, or risk significant function." This appears inconsistent with the description provided in Section 9.2.8 of the FSAR, stating that the MWPS does not perform a safety-significant or risk significant function. Please explain the discrepancy and revise the FSAR as necessary.

09.02.04-***

The ITAAC specified in Part 9 of the COL application, Table 3.0-3, "Makeup Water Preparation System (MWP)," establishes a design requirement that the MWPS provide sufficient quantity and quality of makeup water to meet plant demands during normal operation. Because the MWPS is not safety-related and it does not perform any functions that are important to safety, the reason for establishing an ITAAC to demonstrate the functional capability of the MWPS is not clear. The functional capability of non-safety-related systems is typically confirmed by the initial test program specified

in Chapter 14 of the FSAR. However, in accordance with the requirements specified by 10 CFR 52.47(a)(26) and 10 CFR 52.80(a), ITAAC should be established to demonstrate that MWPS arrangement and design features necessary to ensure that MWPS failures will not impact safety-related SSCs have been properly implemented (related to RAI 9.2.8-01). Please explain why an ITAAC was established for the MWP system.