

## PMSTPCOL PEmails

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**From:** Tai, Tom  
**Sent:** Wednesday, July 22, 2009 11:29 AM  
**To:** John Price (jeprice@stpegs.com)  
**Cc:** STPCOL; Mookhoek, William  
**Subject:** Draft RAI 3209 for Chapter 3.6.1/3.6.2  
**Attachments:** RAI 3209 03.06.01-xx.doc

John,

Attached for your information is draft RAI 3209 for Chapter 3.6.1/3.6.2.

Please let kme know if you need a clarification phone call no later than July 29. If I do not receive a request by them this RAI will be issued formally to STP.

Regards

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**Hearing Identifier:** SouthTexas34Public\_EX  
**Email Number:** 1467

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**Subject:** Draft RAI 3209 for Chapter 3.6.1/3.6.2  
**Sent Date:** 7/22/2009 11:28:30 AM  
**Received Date:** 7/22/2009 11:28:36 AM  
**From:** Tai, Tom

**Created By:** Tom.Tai@nrc.gov

**Recipients:**

"STPCOL" <STP.COL@nrc.gov>  
Tracking Status: None  
"Mookhoek, William" <wemookhoek@STPEGS.COM>  
Tracking Status: None  
"John Price (jeprice@stpegs.com)" <jeprice@stpegs.com>  
Tracking Status: None

**Post Office:** HQCLSTR02.nrc.gov

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Request for Additional Information No. 3209 Revision 2

South Texas Project Units 3 and 4  
South Texas Project Nuclear Operating Co  
Docket No. 52-012 and 52-013  
SRP Section: 03.06.01 - Plant Design for Protection Against Postulated Piping Failures in Fluid  
Systems Outside Containment  
Application Section: 3.6.1 and 3.6.2

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

03.06.01-\*\*\*

This is the supplemental RAI for RAI 129, 03.06.01-1

In the response to (E-RAI 129) RAI 03.06.01-1, the applicant stated:

ITAAC 3.3 Item 2 requires inspections of both the Pipe Break Analysis Report and the as-built high and moderate energy pipe break mitigation features (including spatial separation), but the acceptance criteria do not specify that the Pipe Break Analysis Report will be made available for staff review prior to installation. It is expected that all design-related ITAAC will be scheduled following completion of the applicable design documents and early in the construction phase. Section 3.6.5.1 of the COLA will be revised to commit to notifying the NRC staff of the availability of the Pipe Break Hazards Analysis Report(s) prior to installation of affected systems or components. The necessary details of that information will be provided in the next COLA revision occurring beyond three months after completion of the Pipe Break Analysis Report(s).

Section 3.6.5.1 will be revised to add the following paragraph at the end of the section:

"The NRC staff will be notified of the availability of the design Pipe Break Hazards Analysis Report(s) prior to installation of affected systems or components. The necessary details of that information will be provided in the next COLA revision occurring beyond three months after completion of the Pipe Break Analysis Report(s)."

The staff found this response insufficient. ITAAC 3.3 Item 2 only addresses the as-built aspect of the Pipe Break Analysis Report and not the as-designed. Additionally, Section 3.6.5.1 of the reference ABWR DCD refers to Section 3.6.2.5 and states that the details of the pipe break analysis results and protection methods shall be provided by the COL applicant for the operating license review.

10 CFR 52.79(d)(3) states that the final safety analysis report must demonstrate that all requirements and restrictions set forth in the referenced design certification rule, other than those imposed under 10 CFR Part 50.36b, must be satisfied by the date of issuance of the combined license. Any requirements and restrictions set forth in the

referenced design certification rule that could not be satisfied by the time of issuance of the combined license, must be set forth as terms or conditions of the combined license.

The applicant is therefore, requested to complete and submit the as-designed Pipe Break Analysis Report within the COL review phase; or to propose a site-specific ITAAC to address the as-designed Pipe Break Analysis Report with a license condition that provides a description pertaining to the closure schedule of the report; or an acceptable alternative.