

PMComanchePeakPEm Resource

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Sent: Friday, September 04, 2009 7:11 PM
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Cc: Takacs, Michael; ComanchePeakCOL Resource
Subject: Comanche Peak RCOL Section 13.5.2- RAI # 37
Attachments: RAI 3033 (RAI 37).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.

The response to this RAI is due within 45 calendar days of September 4, 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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Request for Additional Information (RAI) No. 3033

RAI # 37

9/4/2009

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

SRP Section: 13.05.02.01 - Operating and Emergency Operating Procedures
Application Section: 13.5.2

QUESTIONS for Operating Licensing and Human Performance Branch (AP1000/EPR Projects) (COLP)

13.05.02.01-1

Combined License Application (COLA) Part 2, FSAR, Section 13.5.2, 'Operating and Maintenance Procedures' refers to US-APWR Design Control Document (DCD), Section 13.5.1, 'Administrative Procedures,' instead of DCD Section 13.5.2, 'Operating and Maintenance Procedures.' Luminant is requested to clarify the DCD reference in the FSAR.

13.05.02.01-2

The regulatory basis for this question is discussed in NUREG-0800, Standard Review Plan, Chapter 13.5.2.1, "Operating and Emergency Operating Procedures."

The USAPWR design certification document (DCD), Section 13.5.3, 'Combined License Information' COL 13.5(3) states: "The COL Applicant is to develop procedures performed by licensed operators in the main control room... The plan includes the implementation of these procedures."

COL application, Part 2, FSAR, Section 13.5.3, COL 13.5(3) 'Procedures performed by licensed operators in the control room' states: "This COL item is addressed in Subsection 13.5.2 and 13.5.2.1." However, the staff's review found that Subsections 13.5.2 and 13.5.2.1 did not identify the party that would develop and maintain these procedures.

Identify who will develop and maintain the procedures performed by licensed operators in the main control room.

13.05.02.01-3

The regulatory basis for this question is discussed in NUREG-0800, Standard Review Plan, Chapter 13.5.2.1, "Operating and Emergency Operating Procedures."

NUREG-0800, Section 13.5.2.1, states that the procedures generation package should include plant-specific technical guidelines (P-STG's).

Combined License Application, Part 2, FSAR, Section 13.5.2.1, discusses generic technical guidelines, but does not mention P-STG's.

Describe the plans to develop and submit P-STG's.

13.05.02.01-4

The regulatory basis for this question is discussed in NUREG-0800, Standard Review Plan, Chapter 13.5.2.1, "Operating and Emergency Operating Procedures."

NUREG-0800, Section 13.5.2.1, states that, for plants referencing generic technical guidelines, the submitted documentation should include (1) a description of the process used to develop plant-specific technical guidelines from the generic technical guidelines, (2) identification of significant deviations from the generic guidelines, including identification of additional equipment beyond that identified in the generic guidelines, along with all necessary engineering evaluations or analyses to support the adequacy of each deviation, and (3) a description of the process used for identifying operator information and control requirements.

The FSAR, Section 13.5.2.1, discusses generic technical guidelines, but does not mention the above three items.

Describe what information will be included with the generic technical guidelines.

13.05.02.01-5

The regulatory basis for this question is discussed in NUREG-0800, Standard Review Plan, Chapter 13.5.2.1, "Operating and Emergency Operating Procedures."

NUREG-0800, Section 13.5.2.1, states that the procedures generation package should include a plant-specific writer's guide (P-SWG) that details the specific methods to be used by the applicant in preparing emergency operating procedures based on P-STG's.

Combined license application, Part 2, FSAR, Section 13.5.2.1, discusses a writer's guide, but does not specify that it is plant-specific.

Either clarify that the writer's guide discussed in the FSAR is plant-specific or justify the use of a generic writer's guide.

13.05.02.01-6

The regulatory basis for this question is discussed in NUREG-0800, Standard Review Plan, Chapter 13.5.2.1, "Operating and Emergency Operating Procedures."

NUREG-0800, Section 13.5.2.1, states that the procedures generation package should include a description of the program for verification and validation (V&V) of Emergency Operating Procedures (EOP).

Combined license application, Part 2, FSAR, Section 13.5.2.1, discusses a program for validation of the EOP's, does not address EOP verification.

Describe the plans to develop and to submit a complete EOP V&V program.