

## PMComanchePeakPEm Resource

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**From:** Monarque, Stephen  
**Sent:** Monday, September 14, 2009 11:32 AM  
**To:** John.Only@luminant.com; Donald.Woodlan@luminant.com; Eric.Evans@luminant.com; cp34-rai-luminant@mnes-us.com; Diane Yeager; joseph tapia; Kazuya Hayashi; Matthew.Weeks@luminant.com; MNES RAI mailbox; Russ Bywater  
**Cc:** Otto, Ngola; ComanchePeakCOL Resource  
**Subject:** Comanche Peak RCOL- Section 14.3.3 - RAI # 56  
**Attachments:** RAI 2583 (RAI 56).doc

The NRC staff has identified that additional information is needed to continue its review of the combined license application. The NRC staff's request for additional information (RAI) is contained in the attachment.

The response to this RAI is due within 42 calendar days of September 14, 2009.

Note: If changes are needed to the safety analysis report, the NRC staff requests that the RAI response include the proposed wording change

thanks,

Stephen Monarque  
U. S. Nuclear Regulatory Commission  
NRO/DNRL/NMIP  
301-415-1544

**Hearing Identifier:** ComanchePeak\_COL\_Public  
**Email Number:** 603

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**From:** Monarque, Stephen

**Created By:** Stephen.Monarque@nrc.gov

**Recipients:**

"Otto, Ngola" <Ngola.Otto@nrc.gov>  
Tracking Status: None  
"ComanchePeakCOL Resource" <ComanchePeakCOL.Resource@nrc.gov>  
Tracking Status: None  
"John.Only@luminant.com" <John.Only@luminant.com>  
Tracking Status: None  
"Donald.Woodlan@luminant.com" <Donald.Woodlan@luminant.com>  
Tracking Status: None  
"Eric.Evans@luminant.com" <Eric.Evans@luminant.com>  
Tracking Status: None  
"cp34-rai-luminant@mnes-us.com" <cp34-rai-luminant@mnes-us.com>  
Tracking Status: None  
"Diane Yeager" <diane\_yeager@mnes-us.com>  
Tracking Status: None  
"joseph tapia" <joseph\_tapia@mnes-us.com>  
Tracking Status: None  
"Kazuya Hayashi" <kazuya\_hayashi@mnes-us.com>  
Tracking Status: None  
"Matthew.Weeks@luminant.com" <Matthew.Weeks@luminant.com>  
Tracking Status: None  
"MNES RAI mailbox" <cp34-rai@mnes-us.com>  
Tracking Status: None  
"Russ Bywater" <russell\_bywater@mnes-us.com>  
Tracking Status: None

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

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Request for Additional Information (RAI) No. 2583

RAI # 56

9/14/2009

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

SRP Section: 14.03.03 - Piping Systems and Components - Inspections, Tests, Analyses, and  
Acceptance Criteria  
Application Section: 14.3.3

QUESTIONS for Engineering Mechanics Branch 2 (ESBWR/ABWR Projects) (EMB2)

14.03.03-1

**Components ITAAC**

The regulatory basis for this question is discussed in NUREG-0800, Standard Review Plan (SRP), Section 14.3.3, which establishes the criteria the NRC staff uses to review combined license (COL) applications.

In the Comanche Peak Nuclear Power Plant, Units 3 and 4 (CPNPP) COL Application Part 10, 'Inspections, Tests, Analyses and Acceptance Criteria and Proposed License Conditions,' Table A.1-1, 'Ultimate Heat Sink System and Essential Service Water System,' Item 2a, the column titled 'Design Commitment' states that ASME Code Section III components are designed and constructed in accordance with the requirements of American Society of Mechanical Engineers (ASME) Code Section III. In the Inspections, Tests, and Analyses (ITA) and Acceptance Criteria (AC) sections, the "as-built" components were discussed. Please provide separate ITAAC for the two remaining activities, Fabrication & Installation and As-built Reconciliation, as follows:

(1) Fabrication and Installation:

(a) For components designated as ASME Code Section III, certified data report(s) can be used to provide assurance that these components are fabricated, installed, and inspected in accordance with ASME Code Section III requirements. Provide an ITAAC demonstrating that an inspection of the components will be conducted.

(b) Provide an AC for this ITAAC that states "Certified ASME Code Data Report(s) (including N-5 Data Reports, where applicable) and inspection reports exist and conclude that the components are fabricated, installed, and inspected in accordance with the requirements of ASME Code Section III."

(2) As-built Reconciliation

(a) In accordance with guidance in SRP 14.3.3, provide as-built ITAAC demonstrating that the components shall be reconciled with the design requirements.

- (b) Provide an ITA, as part of this ITAAC, to ensure that a reconciliation analysis of the components using as-designed and as-built information and ASME Code certified Design Report will be performed.

14.03.03-2

### **Piping ITAAC**

The regulatory basis for this question is discussed in NUREG-0800, Standard Review Plan, Section 14.3.3, which establishes the criteria the NRC staff uses to review combined license (COL) applications.

In the CPNPP COL Application Part 10, Table A.1-1, Item 2b, the Design Commitment states that ASME Code Section III piping is designed and constructed in accordance with the requirements of ASME Code Section III. In the ITA and AC sections, the "as-built" piping was discussed. Provide separate ITAAC for the two remaining activities, Fabrication & Installation and As-built Reconciliation, as follows:

(1) Fabrication and Installation:

(a) For piping designated as ASME Code Section III, certified data report(s) can be used to provide assurance that the piping is fabricated, installed, and inspected in accordance with ASME Code Section III requirements. Provide an ITAAC demonstrating that an inspection of the piping will be conducted.

(b) Provide an AC for this ITAAC that states "Certified ASME Code Data Report(s) (including N-5 Data Reports, where applicable) and inspection reports exist and conclude that the piping is fabricated, installed, and inspected in accordance with ASME Code Section III requirements."

(2) As-built Reconciliation

(a) In accordance with the guidance in SRP 14.3.3, provide as-built ITAAC demonstrating that the piping shall be reconciled with the design requirements.

(b) Included in this ITAAC can be an ITA to ensure that a reconciliation analysis of the piping using as-designed and as-built information and ASME Code certified Design Reports will be performed.

14.03.03-3

### **Pressure boundary welds**

The regulatory basis for this question is discussed in NUREG-0800, Standard Review Plan, Section 14.3.3, which establishes the criteria the NRC staff uses to review combined license (COL) applications.

For pressure boundary welds of components and piping identified as ASME Code Section III, the applicant provided ITAAC Items 3a and 3b in Part 10, Table A.1-1. The AC stated that the ASME Code Section III requirements are met for non-destructive examination of the as-built pressure boundary welds. The staff found that the proposed AC cannot be concluded by the ITA. Revise the AC to state "ASME Code report(s) exist and conclude that the ASME Code Section III requirements are met for non-destructive examination of the as-built pressure boundary welds."

#### 14.03.03-4

The regulatory basis for this question is discussed in NUREG-0800, Standard Review Plan, Section 14.3.3, which establishes the criteria the NRC staff uses to review combined license (COL) applications.

In the CPNPP COL Application FSAR, Table 3.2-201, Seismic Category I piping for the Ultimate Heat Sink Systems and Essential Service Water Systems were identified. In Part 10, Table A.1-1, the applicant provided ITAAC Item 5b for seismic category piping. The Design Commitment used the words “seismic category piping” while “as-built seismic category piping” and “as-built piping” were used in the AC and ITA.

(1) The staff found that the proposed AC cannot be concluded by the ITA. Revise the AC to states “Report(s) exist and conclude that each of the as-built seismic category piping identified in FSAR, Table 3.2-201 meets the seismic category requirements.”

(2) Seismic Category I is the only seismic classification identified in the section. To bring consistency among all the columns in the ITAAC as well as clarify the seismic category of the piping systems, use the phrases “Seismic Category I piping” in the Design Commitment and “as-built Seismic Category I piping” in the AC and ITA.