

PMComanchePeakPEm Resource

From: Monarque, Stephen
Sent: Wednesday, September 23, 2009 5:54 PM
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Cc: Otto, Ngola; ComanchePeakCOL Resource
Subject: Comanche Peak RCOL RAI 75, Section 14.2
Attachments: RAI 2954 (RAI 75).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. Luminant is requested to inform the NRC staff if a conference call is needed.

The response to this RAI is due within 42 calendar days of September 23, 2009.

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

thanks,

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

Hearing Identifier: ComanchePeak_COL_Public
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Options

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Request for Additional Information No. 2954

RAI # 75

9/23/2009

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

SRP Section: 14.02 - Initial Plant Test Program - Design Certification and New License Applicants
Application Section: 14.2

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

14.02-2

NUREG-0800 Standard Review Plan (SRP) 14.2 Acceptance criterion 3.B.v states in part, "The staff will find that the controls provided for plant modification and repairs, identified as a result of plant testing, are acceptable if the controls ... (3) will ensure a review of any proposed facility modifications by the original design organization or other designated design organizations..."

The NRC staff requests that the applicant revise section 14AA of the Comanche Peak Nuclear Power Plant, Units 3 & 4 COL FSAR to include controls to ensure the review of any proposed facility modifications by the original design organization or other designated design organizations, or justify its exclusion.

14.02-3

SRP 14.2 acceptance criterion 3.C.iv states, "The sequential schedule for individual startup tests should establish that test requirements will be completed in accordance with plant technical specification requirements for SSC operability before changing plant modes."

The NRC staff requests that the applicant either revise Section 14.2.11 or 14AA to include a statement that the schedule for individual startup tests will establish that test requirements will be completed in accordance with plant technical specification requirements for structure, system, and component (SSC) operability before changing plant modes or justify the exclusion of this control.

14.02-4

SRP Section 14.2 Acceptance Criterion 3.D.i states, "The applicant should describe the education, training, and experience requirements established for each management and operating staff member—including the NSSS vendor, architect-engineer, and other major contractors, subcontractors, and vendors, as appropriate—who will conduct the preoperational and startup tests and will develop testing, operating, and emergency procedures."

The applicant's COL application, in Section 14AA.11, "Certification and Qualification of Test Personnel," includes the certification and qualification of the test engineers, the training of the test engineers, supervisors and managers, and the qualification of supervisors. Section 14AA.11 references Ch 17, "Quality Assurance and Reliability Assurance," of the applicant's COL FSAR and Regulatory Guide 1.8, revision 3 (May 2000). Regulatory Guide 1.8, revision 3 (May 2000) endorses ANSI/ANS-3.1-1993, "Selection, Qualification, and Training of Personnel for Nuclear Power Plants," with certain clarifications, additions, and exceptions.

Table 13.1-201 in Section 13.1 of the applicant's COL FSAR lists the projected staffing levels for the startup organization, which include the startup manager, preoperational test engineer, and startup engineer. Table 13.1-201 also references ANSI/ANS-3.1-1993 for the general description, needed education, minimum experience required, and special requirements for the preoperational test engineer and the startup engineer. No specific education and experience requirements are established for the startup manager.

Furthermore, Table 13.0-201 does not include the construction installation test manager, the preoperational and acceptance test manager, and the test program manager and the needed education, minimum experience required, and special requirements for those positions.

In addition, the COL application does not establish education and experience requirements for the architect-engineer personnel, other contract/vendor staff, and the site startup organization.

Lastly, Section 14.AA.3.2 and 14AA.11 list the responsibilities, certification and qualification requirements of test engineers. Table 13.1-201 in Chapter 13 identifies the specific positions identified in ANSI/ANS-3.1-1993, the corresponding plant specific title, and the corresponding titles from the plant-specific organization. Table 13.1-201 lists the startup organization as consisting of the startup manager, preoperational engineers and startup engineers. Please specify the corresponding qualification and training requirements in ANSI-3.1-1993 that will be established for the test engineers, and revise Sections 14.AA.3.2 and 14AA.11 accordingly.

Please revise Section 14.2.2 and 14AA.11 to describe the education, training, qualification, and experience requirements for organizations responsible for conducting preoperational and startup tests, and for organizations that will develop testing, operating, and emergency procedures, or justify an alternative.

14.02-5

Standard Review Plan ((SRP) NUREG-0800) Section 14.2, paragraph II.3.D.ii regarding COL applicants, "Staff Responsibilities, Authorities, and Qualifications," states that "the applicant should develop a training program for each functional group of employees in the organization relative to the schedule for preoperational testing and initial startup testing to ensure that the necessary plant staff are ready to begin the test program."

Section 14AA.11.2, "Training," states that "test engineers, supervisors and managers are indoctrinated in the use of applicable administrative procedures, test procedures and familiarized with applicable quality assurance requirements," and that "test engineers, supervisors, and managers complete systems training to provide familiarization with system and component operations unique to the design of pressurized-water reactor (PWR) nuclear power plants."

The NRC staff requests that the applicant revise Section 14AA.11.2 to include when the training will occur relative to the schedule for preoperational testing and initial startup testing.

14.02-6

SRP 14.2 Acceptance criterion II.3.C.iii states, "Overlapping test program schedules (for multiunit sites) should not result in significant divisions of responsibilities or dilutions of the staff implementing the test program."

Section 14.2.11 of the applicant's COL FSAR states, "Schedule preparation will include an assessment of overlapping test program schedules between CPNPP Units 3 and 4 and provide assurance that CPNPP Unit 3 will be given priority during the period when testing and plant staff personnel will be working on both units."

This statement does not meet the intent of the SRP. The NRC staff requests that the applicant revise Section 14.2.11 of the COL FSAR to include administrative controls to ensure that overlapping test program schedules (for multiunit sites) will not result in significant divisions of responsibilities or dilutions of the staff implementing the test program.

14.02-7

Standard Review Plan (NUREG-0800) Section 14.2.II.3.i, paragraph F concerning combined license (COL) and operating license applicants, "Review, Evaluation, and Approval of Test Results," states that "specific procedures should be implemented to ensure notification of responsible organizations, such as design organizations, when test acceptance criteria are not met and specific controls have been established to resolve such problems."

In addition, Standard Review Plan (NUREG-0800) Section 14.2.II.3, paragraph F.iv concerning combined license (COL) and operating license applicants, "Review, Evaluation, and Approval of Test Results," states that the COL applicant "should include

provisions to allow design organizations to participate in the resolution of design-related problems that result in, or contribute to, a failure to meet test acceptance criteria."

Consistent with SRP Section 14.2, please revise Section 14AA of the FSAR to include specific procedures to ensure notification of responsible organizations, such as design organizations, when test acceptance criteria are not met, specific controls to resolve such problems, and provisions to allow design organizations to participate in the resolution of design-related problems that result in, or contribute to, a failure to meet test acceptance criteria.

14.02-8

Standard Review Plan (NUREG-0800) Section 14.2.II.3, paragraph F.ii concerning combined license (COL) and operating license applicants, "Review, Evaluation, and Approval of Test Results," states that "before proceeding with testing, the applicant should provide controls relating to... (2) the methods used for initial review of individual parts of multiple tests (e.g., hot functional testing).

Section 14AA.9.2 of the applicant's FSAR states that "the test administrative manual includes controls relating to the methods used for initial review of individual parts of multiple tests (e.g., hot functional testing) in order to assure coordination of plant conditions related to these tests."

The NRC staff requests that the applicant revise Section 14AA.9.2 or 14AA.10 to describe the actual administrative controls (relating to the methods used for initial review of individual parts of multiple tests) that will be implemented at CPNPP consistent with the organization currently described in Section 14AA of the CPNPP FSAR.