

## PMComanchePeakPEm Resource

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**From:** Monarque, Stephen  
**Sent:** Thursday, September 24, 2009 5:03 PM  
**To:** John.Only@luminant.com; Donald.Woodlan@luminant.com; cp34-rai-luminant@mnes-us.com; Diane Yeager; Eric.Evans@luminant.com; joseph tapia; Kazuya Hayashi; Matthew.Weeks@luminant.com; MNES RAI mailbox; Russ Bywater  
**Cc:** Reyes, Ruth; ComanchePeakCOL Resource  
**Subject:** Comanche Peak RCOL Section 6.2.2 - RAI # 76  
**Attachments:** RAI 3105 (RAI 76).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 24, 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  
**Email Number:** 628

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**Subject:** Comanche Peak RCOL Section 6.2.2 - RAI # 76  
**Sent Date:** 9/24/2009 5:02:52 PM  
**Received Date:** 9/24/2009 5:02:53 PM  
**From:** Monarque, Stephen

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

**Recipients:**

"Reyes, Ruth" <Ruth.Reyes@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  
"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  
"Eric.Evans@luminant.com" <Eric.Evans@luminant.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

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**Options**

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Request for Additional Information (RAI) No. 3105

RAI # 76

9/24/2009

Comanche Peak Units 3 and 4  
Luminant Generation Company, LLC.  
Docket No. 52-034 and 52-035  
SRP Section: 06.02.02 - Containment Heat Removal Systems  
Application Section: 6.2.2.3

QUESTIONS for Containment and Ventilation Branch 1 (AP1000/EPR Projects) (SPCV)

06.02.02-1

NUREG-0800, Standard Review Plan (SRP) 6.2.2, 'Containment Heat Removal Systems,' and Regulatory Guide 1.82, 'Water Sources for Long-term Recirculation Cooling Following a Loss-of-Coolant Accident,' Revision 3, establish the criteria the NRC staff will use to evaluate whether an applicant meets the NRC's regulations.

The applicant is requested to describe its plan to include updated US-APWR design certification application submittals on sump performance, as well as incorporating US-APWR RAI response submittals that address additional programmatic items related to foreign materials, coatings deficiencies, permanent plant changes inside containment, and maintenance activities (including temporary changes) that are assessed and managed in accordance with the Maintenance Rule, into the applicant's combined license application.

06.02.02-2

NUREG-0800, Standard Review Plan (SRP) 6.2.2, 'Containment Heat Removal Systems,' and Regulatory Guide 1.82, 'Water Sources for Long-term Recirculation Cooling Following a Loss-of-Coolant Accident,' Revision 3, establish the criteria the NRC staff will use to evaluate whether an applicant meets the NRC's regulations.

The US-APWR design certification (DC) FSAR, in Chapter 6.2.2 "Containment Heat Removal Systems", states:

"Preparation of a cleanliness, housekeeping and foreign materials exclusion program is the responsibility of the COL applicant. This program addresses other debris sources such as latent debris inside containment. This program minimizes foreign materials in the containment". [See COL item 6.2(5)]

The COL applicant, in response to this COL item, states:

"Administrative procedures implement the containment cleanliness program."

"The containment cleanliness program including administrative procedures will be developed and implemented prior to initial fuel load". [Refer to STD COL item 6.2(5)]

In order to assess cleanliness program performance, acceptance criteria should be provided to the NRC staff. STD COL 6.2(5) does not specify containment cleanliness performance or acceptance criteria. Therefore, provide containment cleanliness criteria (for example, quantities and types of latent debris) in the COL application FSAR that enable the COL applicant to remain within the containment cleanliness design basis.

#### 06.02.02-3

NUREG-0800, Standard Review Plan (SRP) 6.2.2, 'Containment Heat Removal Systems,' and Regulatory Guide 1.82, 'Water Sources for Long-term Recirculation Cooling Following a Loss-of-Coolant Accident,' Revision 3, establish the criteria the NRC staff will use to evaluate whether an applicant meets the NRC's regulations.

With regard to the COL item requiring the preparation of a containment cleanliness program, discuss program features or elements that provide assurance that the plant latent debris design bases are meant to include miscellaneous debris sources such as tape, equipment tags, stickers or placards.

Include in the discussion:

- \* Organizational responsibilities for implementing the program
- \* Controls and limits on type and quantity of materials for all modes of operation (not limited to outages)
- \* Guidance documents used to develop the cleanliness program survey/sampling methods
- \* When sampling is required to be conducted
- \* When sampling results are evaluated
- \* Reporting requirements for degraded conditions or non-conforming results