

PMComanchePeakPEm Resource

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Sent: Friday, September 25, 2009 2:40 PM
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Cc: ComanchePeakCOL Resource; Otto, Ngola
Subject: Comanche Peak RCOL Section 14.3.7 - RAI # 81
Attachments: RAI 3293 (RAI 81).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 25, 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
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Request for Additional Information (RAI) No. 3293

RAI # 81

9/25/2009

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

SRP Section: 14.03.07 - Plant Systems - Inspections, Tests, Analyses, and Acceptance Criteria
Application Section: Part 10, Appendix A.1, Tables A.1-1, A.2-1, & A.3-1

QUESTIONS for Technical Specification Branch (CTSB)

14.03.07-1

ITAAC Item 1.b in Table A.1-1

Why does the Acceptance Criteria (AC) statement not identify the same exception noted in the Design Commitment in regard to the mechanical divisions of the system being physically separated from one another? In addition, why does the ITAAC not identify the system of concern? The regulatory basis for these comments is 10 CFR 50.70 and 10 CFR 50, Appendix B, Criterion III, Design Control.

14.03.07-2

In General:

Why do the ASME ITAAC for this COL application not have the same format as the ASME ITAAC for the APWR Design Control Document (DCD)? The format of the ASME ITAAC for this COL application should be the same as those for the DCD. The regulatory basis for these comments is 10 CFR 50.70 and 10 CFR 50, Appendix B, Criterion III, Design Control. This RAI question is also applicable to following ITAAC:

ITAAC Item 2.a in Table A.1-1

ITAAC Item 2.b in Table A.1-1

ITAAC Item 3.a in Table A.1-1

ITAAC Item 3.b in Table A.1-1

ITAAC Item 4.a in Table A.1-1

ITAAC Item 4.b in Table A.1-1

14.03.07-3

ITAAC Item 5.a in Table A.1-1

The seismic category ITAAC should be formatted in a similar manner as the current seismic category I ITAAC for the APWR Design Control Document (DCD). Why do the seismic category ITAAC for this application not have the same format as the most current format for the seismic category I ITAAC for the APWR DCD? This is applicable to all the seismic category I ITAAC for this application. The regulatory basis for these comments is 10 CFR 50.70 and 10 CFR 50, Appendix B, Criterion III, Design Control. This RAI question is also applicable to following ITAAC:

ITAAC Item 5.b in Table A.1-1

ITAAC Item 2 in Table A.2-1

14.03.07-4

ITAAC Item 6.b in Table A.1-1

Why does this ITAAC and similar ones not account for the fact that the separation of electrical cables should be for every component in which they are routed, for example, panels, enclosures, switchgear, raceway, etc? This ITAAC and similar ones should indicate "that electrical Class 1E cables are separated from Class 1E cables in other divisions and non-Class 1E cables" not just in raceways. This ITAAC should also address isolators if required. If separation is not obtained, will an analysis be performed? The regulatory basis for these comments is 10 CFR 50.70 and 10 CFR 50, Appendix B, Criterion III, Design Control. This RAI question is also applicable to the following ITAAC:

ITAAC Item 3.b in Table A.2-1

14.03.07-5

ITAAC Item 7 in Table A.1-1

The phrase "heat removal capability transferred design heat load" in the Design Commitment and AC is confusing. Why does the ITAAC not indicate (1) what system removes the design heat load from the ESWS, and (2) that that system has the heat removal capability to transfer the design heat load from the ESWS? The regulatory basis for these comments is 10 CFR 50.70 and 10 CFR 50, Appendix B, Criterion III, Design Control. The use of the terms "adequate" in both Design Commitment and AC is not appropriate. The heat removal capability of the UHS should be more clearly defined.

14.03.07-6

ITAAC Item 9.b in Table A.1-1

Why does the AC not indicate what actuation signal the simulated signal represents? For instance, "upon receipt of a simulated ECCS actuation signal, the as-built blowdown control valve closes automatically." The regulatory basis for these comments is 10 CFR 50.70 and 10 CFR 50, Appendix B, Criterion III, Design Control. This RAI question is also applicable to the following ITAAC:

ITAAC Item 10.b in Table A.1-1

ITAAC Item 5.b in Table A.2-1

14.03.07-7

ITAAC Items 11 and 12 in Table A.1-1

The table A.1-3 identifies displays for MCR and RSC. However, the alarms are only for the MCR, and the control functions are not identified with either the MCR or RSC. ITAAC Item 11 is only for displays on the MCR, and ITAAC Item 12 is for displays and controls on the RSC. Why do Items 11 or 12 not refer to the alarms in Table A.1-3? Also why does Item 11 not refer to the control functions? Why do the ITA of these two ITAAC not require "tests" instead of or in addition to "inspections" because the Item 11 is actually retrieving the displays. Also why are the words used in Item 11 different from those used in Item 12? Item 11 refers to displays can be "retrieved", whereas, Item 12 indicates that displays and controls "exist" at the appropriate panels. The regulatory basis for these comments is 10 CFR 50.70 and 10 CFR 50, Appendix B, Criterion III, Design Control. This RAI question is applicable also to the following ITAAC:

ITAAC Items 6 and 7 in Table A.2-1

14.03.07-8

ITAAC Item 13 in Table A.1-1

Why does Item 13 not refer to the system associated with the basins? The system which contains these basins should be stated in this ITAAC. The regulatory basis for these comments is 10 CFR 50.70 and 10 CFR 50, Appendix B, Criterion III, Design Control.

14.03.07-9

ITAAC Item 1 in Table A.3-1

The wording in the Design Commitment and AC are confusing. For example, the structural configurations should be as shown on the Figures and as indicated in the Table. Why does the Design Commitment state that structural configurations are as shown on Figures 3.8-201 and Table A.3-2? Also why does the AC refer to design configurations instead of structural configurations and use the term descriptions in regard to figures? The regulatory basis for these comments is 10 CFR 50.70 and 10 CFR 50, Appendix B, Criterion III, Design Control.

14.03.07-10

ITAAC Items 2.a and 2.b in Table A.3-1

Why do the AC of both of these ITAAC refer to the "appropriate locations" for either flood barriers and water-tight doors instead of actual locations or locations as shown on figures or as indicated in tables? The regulatory basis for these comments is 10 CFR 50.70 and 10 CFR 50, Appendix B, Criterion III, Design Control.

14.03.07-11

ITAAC Items 3 and 4 in Table A.3-1

Why do the AC of both of these ITAAC refer to either "acceptable level" or "adequate thickness" instead of some quantity that can be measured? A reference to a table or a figure could be appropriate. For the Design Commitment for Item 3, what is meant by "provided appropriately against the internal and external flooding? The clarification of these words seems necessary. For the AC for Item 3, why is the exception noted in the Design Commitment not addressed? For the ITA for Item 4, would an "analysis" in addition to the "inspection" be necessary to determine the necessary thickness to decrease water seepage to a "minimum value" or to "zero seepage.". The regulatory basis for these comments is 10 CFR 50.70 and 10 CFR 50, Appendix B, Criterion III, Design Control.

14.03.07-12

ITAAC Items 6 and 7 in Table A.3-1

Why are the AC of these two ITAAC less detailed than their Design Commitments? Since the AC is what determines if the Design Commitment is met, an AC should provide similar information as its associated Design Commitment. The regulatory basis for these comments is 10 CFR 50.70 and 10 CFR 50, Appendix B, Criterion III, Design Control. This RAI question is also applicable to the following ITAAC:

ITAAC Item 8 in Table A.3-1 - In regard to stating in the AC, that the penetrations and openings are in the fire barriers of the UHSRS, ESWPT, and PSFSV.