

## PMComanchePeakPEm Resource

---

**From:** Monarque, Stephen  
**Sent:** Tuesday, September 29, 2009 9:22 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:** ComanchePeakCOL Resource; Magee, Michael  
**Subject:** Comanche Peak RCOLA Chapter 17 - RAI # 92  
**Attachments:** RAI 3688 (RAI 92).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 36 calendar days of September 29, 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:** 648

**Mail Envelope Properties** (9C2386A0C0BC584684916F7A0482B6CA04A7322FB1)

**Subject:** Comanche Peak RCOLA Chapter 17 - RAI # 92  
**Sent Date:** 9/29/2009 9:22:02 PM  
**Received Date:** 9/29/2009 9:22:05 PM  
**From:** Monarque, Stephen

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

**Recipients:**

"ComanchePeakCOL Resource" <ComanchePeakCOL.Resource@nrc.gov>

Tracking Status: None

"Magee, Michael" <Michael.Magee@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

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

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	649	9/29/2009 9:22:05 PM
RAI 3688 (RAI 92).doc	33274	

**Options**

**Priority:** Standard

**Return Notification:** No

**Reply Requested:** No

**Sensitivity:** Normal

**Expiration Date:**

**Recipients Received:**

Request for Additional Information (RAI) No. 3688

RAI # 92

9/29/2009

Comanche Peak Units 3 and 4  
Luminant Generation Company, LLC.  
Docket No. 52-034 and 52-035  
SRP Section: 17.04 - Reliability Assurance Program (RAP)  
Application Section: 17.4

QUESTIONS for PRA Licensing, Operations Support and Maintenance Branch 1 (AP1000/EPR Projects) (SPLA)

17.04-1

NUREG-0800, Standard Review Plan, Chapter 17.4, 'Reliability Assurance Program (RAP),' establishes criteria that the NRC staff intends to use to evaluate whether an applicant meets the NRC's regulations.

Section 17.4.4 of the Comanche Peak combined license (COL) application states "These organizations will ensure that the objectives of site operational (O)-RAP are incorporated into existing programs." The staff requests that the applicant explain in FSAR Section 17.4 what the O-RAP objectives are.

17.04-2

NUREG-0800, Standard Review Plan, Chapter 17.4, 'Reliability Assurance Program (RAP),' establishes criteria that the NRC staff intends to use to evaluate whether an applicant meets the NRC's regulations.

Section 17.4.5 of the Comanche Peak COL application states "The O-RAP is integrated into the Maintenance Rule Program (Section 17.6), and other operational programs." The NRC staff requests that the applicant list these other operational programs in FSAR Section 17.4 and provide cross-references to the specific sections of chapters of the application where these programs are described.

17.04-3

Table 17.4-201 lists "Cooling tower fan," but there is more than one cooling tower fan. The staff requests that the applicant list all cooling tower fans in this table.

17.04-4

Regulatory Guide 1.206, Section C.III.1, Subsection C.I.17.4.4 states that the COL applicant should provide in Chapter 17.4 of the FSAR the quality controls (organization, design control, procedures and instructions, records, corrective action, and audit plans) for developing and implementing the design (D)-RAP. [Note that these "quality controls" are identified as "quality elements" in Section 17.4 of the SRP and as "essential elements" in SECY 95-132.] Section 17.4.4 ("Quality Controls") of the US-APWR Design Control Document (DCD) discusses these

essential elements for developing and implementing an effective D-RAP during the design certification phase. While the essential elements that are applied by a COL applicant referencing the US-APWR DCD may be similar to that described in Section 17.4.4 of the US-APWR DCD, the COL applicant should specify its own essential elements for developing and implementing an effective D-RAP.

It is not clear as to whether the information incorporated by reference in Section 17.4.4 of the FSAR, Parts a ("Organization") and b ("Design Control"), also applies to the COL applicant. If this information does not apply to the COL applicant, then the COL applicant should provide supplemental information in the FSAR in accordance with the provisions in SRP Section 17.4 to address its own essential elements for developing and implementing an effective D-RAP.

The NRC staff requests that the COL applicant clarify whether the information incorporated by reference in Section 17.4.4 of the FSAR, Parts a ("Organization") and b ("Design Control"), applies to the COL applicant's organization and design control process. If this information does not apply to the COL applicant, then provide supplemental information in the FSAR in accordance with the provisions in SRP Section 17.4 (i.e., SRP Acceptance Criteria A.2.a and A.2.b) to address its own essential elements for developing and implementing an effective D-RAP.