

PMComanchePeakPEm Resource

From: Monarque, Stephen
Sent: Wednesday, September 30, 2009 7:54 PM
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Cc: Ward, William; ComanchePeakCOL Resource
Subject: Comanche Peak RCOL Section 3.11 - RAI # 97
Attachments: RAI 3705 (RAI 97).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
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Request for Additional Information (RAI) No. 3705

RAI # 97

9/30/2009

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

SRP Section: 03.11 - Environmental Qualification of Mechanical and Electrical Equipment
Application Section: 3.11

QUESTIONS for Electrical Engineering Branch (EEB)

03.11-12

This Request for Additional Information (RAI) is necessary for the NRC staff to assess the applicant's compliance with 10 CFR 52.79(a)(10).

Section 3.11(1) of US-APWR design certification document (DCD) requires that the COL applicant that references the US-APWR design be responsible for assembling and maintaining the environmental qualification (EQ) document, which summarizes the qualification results for all equipment identified in Appendix 3D, for the life of the plant (also see Figure 3.11-1 of the DCD). The applicant, in Section 3.11(1) of the COL application, proposes to bear this responsibility, rather than the DCD applicant. Provide the basis for this change and explain why it is acceptable to fulfill the records retention requirements.

03.11-13

Section 3.11(2) of the US-APWR DCD states that the COL applicant (not COL holder) is responsible for describing how the results of the qualification tests for all equipment, not only site-specific equipment, is to be recorded in an auditable file in accordance with requirements of 10 CFR 50.49. Provide a detailed account of each responsibility of both the COL applicant and the COL holder to meet the requirements under 10 CFR 50.49 for implementation of COL item CP COL 3.11(2).

03.11-14

Section 3.11(3) of the US-APWR DCD states that the COL applicant is required to provide a schedule showing the EQ program proposed implementation milestones. Provide that schedule for the CP COL 3.11(3) information. In addition, explain how this will work with the operational program described in Comanche Peak Nuclear Power Plant, FSAR Table 13.4-201 as item No. 3.

03.11-15

Section 3.11(4) of the US-APWR DCD requires the COL applicant to describe periodic tests, calibrations, and inspections to be performed during the life of the plant, which verify that the identified equipment remains capable of fulfilling its intended function. In the FSAR replacement paragraph of CP COL 3.11(4), the COL applicant references a DC applicant technical report and FSAR Table 13.4-201 for implementation of the operational EQ program. It is not clear how the COL applicant intends to meet this requirement. CP COL 3.11(4) needs to be clarified to demonstrate compliance with this DCD COL item.

03.11-16

The last sentence of the proposed paragraph in CP COL 3.11(5) reads “This table lists information on site-specific safety-related or important to safety equipment.” The second sentence of the same paragraph in Section 3.11.1.1 reads “Safety-related and important to safety components.” Please clarify what information the table provides.

03.11-17

Explain the equivalent qualification process used to qualify the equipment, identified in Appendix 3D, in CP COL items 3.11(6), 3.11(7), and 3.11(8). Provide details of what parameters are used to evaluate the equivalency in the process. Identify where the equivalent qualification process is defined or explained.