CCNPP3COLA NPEmails

From: Arora, Surinder
Sent: Monday, October 26, 2009 12:55 PM
To: 'Poche, Robert'; 'cc3project@constellation.com'
Cc: CCNPP3COL Resource; DeMarshall, Joseph; Kowal, Mark; Colaccino, Joseph; Hearn, Peter; Biggins, James; Vrahoretis, Susan; Hair, Christopher
Subject: DRAFT RAI No. 190 CTSB 3895
Attachments: DRAFT RAI 190 CTSB 3895.doc

Rob,

Attached is DRAFT RAI No. 190 (eRAI No. 3895). You have until November 9, 2009 to review it and decide whether you need a conference call to discuss it before the final issuance. After the call or after November 9, 2009, the RAI will be finalized and sent to you for response. You will then have 30 days to respond.

Thanks.

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From: Arora, Surinder

Created By: Surinder.Arora@nrc.gov

Recipients:
"CCNPP3COL Resource" <CCNPP3COL.Resource@nrc.gov>
Tracking Status: None
"DeMarshall, Joseph" <Joseph.DeMarshall@nrc.gov>
Tracking Status: None
"Kowal, Mark" <Mark.Kowal@nrc.gov>
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"Colaccino, Joseph" <Joseph.Colaccino@nrc.gov>
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"Hearn, Peter" <Peter.Hearn@nrc.gov>
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"Hair, Christopher" <Christopher.Hair@nrc.gov>
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"'Poche, Robert'" <Robert.Poche@constellation.com>
Tracking Status: None
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Tracking Status: None

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Options
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Reply Requested: Yes
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Request for Additional Information No. 190 (eRAI 3895)
DRAFT
10/26/2009

Calvert Cliffs Unit 3
UniStar
Docket No. 52-016
SRP Section: 16 - Technical Specifications
Application Section: 16

QUESTIONS for Technical Specification Branch (CTSB)

16-20

Follow-up to RAI 95, Question 16-1.

a) The response states "U.S. EPR Revision 1, Tier 2 Chapter 16 has been revised to include Reviewer's Notes that permit a COL applicant to utilize a Setpoint Control Program (SCP). Subsequent to the issuance of Revision 1 to the U.S. EPR FSAR, the U.S. EPR Protection System Technical Specifications (LCO 3.3.1) and Bases were revised and submitted in response to RAI Set 103 (ML091820006). As part of that submittal, changes were made to the Technical Specifications to facilitate adoption and NRC approval of a Setpoint Control Program." The Reviewer's Note information provided in the EPR GTS and Bases (Rev. 1 and Interim Rev. 2) allowing the optional approach of specifying a yet to be defined Setpoint Control Program (SCP) Administrative Controls Technical Specification (TS), instead of placing brackets around a fully developed SCP Administrative Controls TS with Surveillance Requirement (SR) or table references to the SCP TS, does not satisfy 10 CFR 52.47(a)(11). In meetings on August 13-14, 2009, between Areva NP and the NRC staff, Areva acknowledged the staff's position and agreed to remove the Reviewer's Notes from the EPR GTS and Bases. Supplemental RAI-SRP16-CTSB-3742/14593 was issued to document and address the staff's findings regarding the Reviewer's Notes. The applicant is requested to update the response accordingly.

b) The response includes an evaluation of the Setpoint Control Program (SCP) departure as if it were Tier 2 information. Departure from the EPR GTS will require staff approval via an exemption from the future Design Change Rule (DCR). Therefore, the evaluation is unnecessary.

c) Revised Footnote (c) on page 14 of the response (Plant Specific Technical Specifications, Item "g"), states "The setpoint shall be reset to a value that is within the as-left tolerance around the Limiting Trip Setpoint (LTSP) at the completion of the surveillance; otherwise the division shall be declared inoperable." Step 5.5.18.c.5 of the Setpoint Control Program (SCP) Specification proposed by the applicant states "The instrument division trip setting shall be set to a value within the specified ALT around the specified NTSP (a trip setting as or more conservative than the specified LTSP) at the completion of the surveillance; otherwise, the surveillance requirement is not met and the instrument division shall be immediately declared inoperable." Also, note that step 5.5.18.c.3 of the referenced SCP Specification compares the as-found value of the

instrument trip setting to the previous as-left value or the specified NTSP, not the LTSP. The applicant is requested to resolve the inconsistencies.

d) Discussion Item 8 on page 11 of the response states "not all functions provide an automatic trip setpoint that protects against violating the Reactor Core Safety Limits or Reactor Coolant System Pressure Safety Limit during AOOs (e.g., Control Room HVAC Reconfiguration to Recirculation Mode on High Intake Activity). The required Technical Specification automatic protection instrumentation functions are identified by the use of Footnotes (b) and (c) in the Limiting Trip Setpoint / Design Limit column in Table 3.3.1-2 of the U.S. EPR Technical Specifications." 10 CFR 50.36(c)(1)(ii)(A) requires that the TSs include Limiting Safety System Settings (LSSSs) for variables that have significant safety functions. For variables on which a Safety Limit (SL) has been placed, the LSSS must be chosen to initiate automatic protective action to correct abnormal situations before the SL is exceeded. 10 CFR 50.36(c)(1)(ii)(A) also contains requirements for a general class of LSSSs; LSSSs related to variables having significant safety functions but which do not protect SLs (referred to as the Design Limit by the applicant). All plant operating licenses have TSs for LSSSs that are not related to SLs. For these LSSSs, 10 CFR 50.36(c)(1)(ii)(A) also requires that a license take appropriate action if it is determined that the automatic safety system does not function as required. The use of footnotes and Bases statements to distinguish between SL-LSSS and non-SL LSSS functions is unnecessary. The distinctions add little value and the classification of EPR Protection System (PS) instrumentation functions (SL-LSSS versus non-SL LSSS) is not clearly understood in all cases. Setpoints for SL-LSSS and non-SL LSSS functions alike should be included in the Setpoint Control Program (SCP). In addition, Footnote (b) and (c) information is redundant to the information provided in the SCP Specification, making inclusion of the footnotes in Table 3.3.1-2 of the Plant Specific Technical Specifications (PTS) unnecessary. Note that removal of the footnotes would resolve the issue identified in Item c above.

e) Item "e" on pages 13 and 14 of the response states "Table 3.3.1-2 contains a "Limiting Trip Setpoint / Design Limit" column. Where a numerical setpoint is provided in the Limiting Trip Setpoint / Nominal Value column in Table 3.3.1-2 (as opposed to a footnote), the numerical setpoint is being replaced with a new footnote (w)". It will also be necessary to include Footnote (w) in the referenced column of Table 3.3.1-2 for Reactor Trip Functions (A.1.a, A.1.b, A.1.c, A.1.d, A.1.d, A.1.e, A.2) and ESFAS Functions (B.11.c, B.11.d, 12.a, 12.b), along with the already existing footnotes specifying the Core Operating Limits Report (COLR) and the Pressure And Temperature Limits Report (PTLR). The additional footnote referencing the Setpoint Control Program (SCP) is necessary to ensure that the requirements of the SCP are applied to the setpoint values of the referenced functions as well.

f) Step 5.5.18.c.2.iii of the applicant proposed Setpoint Control Program (SCP) Specification, revises the second parenthetical reference to "the specified ALT" in the NRC suggested model SCP. The applicant's basis for the change is stated in Discussion Item 7 which reads "The phrase "the specified ALT" is used in parentheses twice in this paragraph. The second use was intended to clarify the uncertainties associated with the setting tolerance band." The revision actually describes the setting tolerance band rather than providing the intended clarification regarding its uncertainties.

g) The reference to Surveillance Requirement (SR) 3.3.1.4 in Item "c" on page 13 of the response is incorrect. The actual reference should be to SR 3.3.1.6.

h) Items “m” and “n” on page 20 of the response contain the same editorial error. The word “that” should be removed from the second line of the quoted text for both items.

Follow-up to RAI 95, Question 16-2.

a) The response states “As stated on TSTF-493, Rev. 3, Page 1: “In all cases, the term Limiting Trip Setpoint” may be replaced in the Technical Specifications and in the Bases by a term (e.g., NTSP) consistent with the plant-specific setpoint methodology.”” The applicant is requested to provide the version of TSTF-493, Rev. 3 (e.g., WOG, BWOG, BWR4, etc) that is referenced in the response.