CCNPP3COLA PEmails

From: Arora, Surinder
Sent: Tuesday, November 10, 2009 1:05 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: FINAL RAI No. 191 CTSB 3920
Attachments: FINAL RAI 191 CTSB 3920.doc

Rob,

Attached please find the subject request for additional information (RAI). The draft of this RAI was sent to you on October 27, 2009. No clarification phone call was requested during the draft review period on this RAI.

The schedule we have established for review of your application assumes technically correct and complete responses within 30 days of receipt of RAIs. For any RAIs that cannot be answered within 30 days, it is expected that a schedule date for submitting your technically correct and complete response will be provided to the staff within the 30 day period so that the staff can assess how this information will impact the review schedule.

Your response letter should also include a statement confirming that the response does or does not contain any sensitive or proprietary information.

Thanks.

SURINDER ARORA, PE
PROJECT MANAGER,
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US Nuclear Regulatory Commission

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Hearing Identifier: CalvertCliffs_Unit3Cola_Public_EX
Email Number: 1082

Mail Envelope Properties (B46615B367D1144982B324704E3BCEED1A5B328EEF)

Subject: FINAL RAI No. 191 CTSB 3920
Sent Date: 11/10/2009 1:04:35 PM
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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>
Tracking Status: None
"Colaccino, Joseph" <Joseph.Colaccino@nrc.gov>
Tracking Status: None
"Hearn, Peter" <Peter.Hearn@nrc.gov>
Tracking Status: None
"Biggins, James" <James.Biggins@nrc.gov>
Tracking Status: None
"Vrahoretis, Susan" <Susan.Vrahoretis@nrc.gov>
Tracking Status: None
"Hair, Christopher" <Christopher.Hair@nrc.gov>
Tracking Status: None
"'Poche, Robert'" <Robert.Poche@constellation.com>
Tracking Status: None
"'cc3project@constellation.com'" <cc3project@constellation.com>
Tracking Status: None

Post Office: HQCLSTR01.nrc.gov

Files	**Size**	**Date & Time**
MESSAGE	1397	11/10/2009 1:04:36 PM
FINAL RAI 191 CTSB 3920.doc	31226	

Options
Priority: Standard
Return Notification: No
Reply Requested: Yes
Sensitivity: Normal
Expiration Date:
Recipients Received:

Request for Additional Information No. 191 (eRAI 3920)

11/10/2009

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

QUESTIONS for Technical Specification Branch (CTSB)

16-21

Follow-up to RAI 95, Question 16-6.

Part 4, Technical Specifications and Bases (Item 17 - Protection System Bases 3.3.1), of the Calvert Cliffs Nuclear Power Plant reference COL application, Rev. 6, identifies Bases sections where the discussions have been revised to denote those functions for which Limiting Safety System Settings (LSSSs) are not associated with safety limits (non-SL LSSSs). 10 CFR 50.36(c)(1)(ii)(A) requires that the TSs include Limiting Safety System Settings 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. 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 licensee take appropriate action if it is determined that the automatic safety system does not function as required. The subset of LSSSs that directly protect against violating the reactor core and RCS pressure boundary safety limits during anticipated operational occurrences (AOOs) are referred to as SL-LSSSs. The inclusion of 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 setpoints as either SL-LSSS or non-SL LSSS is not well understood for all functions. It is unclear how a number of the Table 3.3.1-2 reactor trip and Engineered Safety Feature function setpoints designated as SL-LSSS, “directly” protect against violating reactor core and RCS pressure boundary safety limits. In addition, setpoints for SL-LSSS and non-SL LSSS functions alike should be included in the Setpoint Control Program (SCP). SCP requirements should apply to all significant safety function LSSSs. In RAI 95, Question 16-6, the staff requested additional information regarding the applicant’s use of “Setting Basis” values (Analytical and Design Limits) in Table 3.3.1-2 of the Plant Specific Technical Specifications (PTS), and that clarifying information be included in the Bases discussions to specify the limit type associated with each function. The clarifying information was requested on the basis that the “Setting Basis” approach (Analytical versus Design Limit) deviated from both NUREG-1431, “Standard Technical Specifications Westinghouse Plants,” and the U.S. EPR GTS. The response to Question 16-6 and the resultant Bases changes identify significant safety functions for which the associated LSSSs are not directly related to the protection of a safety limit (otherwise referred to as “Design Limit” by the applicant), apparently for the purpose of identifying LSSS setpoints that are to be excluded from the requirements of the Setpoint

Control Program. The applicant is requested to validate and confirm that the LSSS setpoints for all “significant safety functions” (SL LSSS and non-SL LSSS) specified in the PTS will be subject to the requirements of the proposed SCP. This issue has been identified as an open item in the SER w/OI for Part 4 of the Calvert Cliffs Nuclear Power Plant reference COL application.