BellBendCOLPEm Resource

From: Canova, Michael
Sent: Tuesday, November 10, 2009 8:58 AM
To: 'Sgarro, Rocco R'; 'BBNPP@pplweb.com'; Freels, James; 'Jacqueline.bell@unistarnuclear.com'; 'melanie.Frailer@unistarnuclear.com'; Malave, Yanely
Cc: BellBendCOL Resource; Vrahoretis, Susan; Colaccino, Joseph; Peralta, Juan; Roy, Tarun
Subject: RE: Bell Bend COLA - Draft Request for Information No.s 65 and 67 (RAI No.s 65 and 67)- CQVP - 2817 and 3767,
Attachments: Letter 67 - RAI 3767 - CQVP.doc; Letter 65 - RAI 2817 CQVP.doc

Attached is DRAFT RAI No.s 65 and 67 for the Bell Bend COL Application. You have ten working days to review this request and to decide whether you need a conference call to discuss it. Please notify me of your decision in this regard.

After the call, or after ten days, the RAI will be finalized and sent to you. The scheduel for submittal will be established prior to formalizing this RAI .

If you have any questions, please contact me.

Michael A. Canova
Project Manager - Bell Bend COL Application
Docket 52-039
EPR Project Branch
Division of New Reactor Licensing
Office of New Reactors
301-415-0737

Hearing Identifier: BellBend_COL_Public
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Subject: RE: Bell Bend COLA - Draft Request for Information No.s 65 and 67 (RAI No.s 65 and 67)- CQVP - 2817 and 3767,
Sent Date: 11/10/2009 8:58:13 AM
Received Date: 11/10/2009 8:58:15 AM
From: Canova, Michael

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Files	**Size**	**Date & Time**
MESSAGE	652	11/10/2009 8:58:15 AM
Letter 67 - RAI 3767 - CQVP.doc	31738	
Letter 65 - RAI 2817 CQVP.doc	31738	

Options
Priority: Standard
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Sensitivity: Normal
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Request for Additional Information No. 67
Application Revision 0

DRAFT

10/7/2009

Bell Bend
PPL Bell Bend LLC.
Docket No. 52-039
SRP Section: 17.5 - Quality Assurance Program Description - Design Certification, Early Site Permit and New License Applicants
Application Section: 17.5

QUESTIONS for Quality and Vendor Branch 1 (AP1000/EPR Projects) (CQVP)

17.5-7

Bell Bend, Revision 0, "Quality Assurance Program Description," describes how the quality assurance requirements of Appendix B to 10 CFR Part 50 will be implemented. The regulatory guides identified below provide methods acceptable to the staff for describing in the QAPD how the subject requirements of Appendix B to 10 CFR Part 50 will be met. Bell Bend QAPD should commit to these regulatory guides or provide justification of any proposed alternatives. Exceptions to methods described by these regulatory positions should be explicitly addressed in the Bell Bend QAPD with justification with detail sufficient for the staff to evaluate compliance with the requirements of Appendix B to 10 CFR Part 50. Further, Bell Bend QAPD should be revised to clarify that changes to regulatory commitments described in the QAPD or incorporated by reference are subject to the change process defined by 10 CFR 50.54(a).

a. RG 1.8, Rev. 3, May 2000, "Qualification and Training of Personnel for Nuclear Power Plants" This regulatory guide provides guidance acceptable to the NRC staff for complying with the personnel training and qualification requirements of 10 CFR Part 50, Section 50.120f. RG 1.8, Rev. 3 finds ANSI/ANS-3.1-1993 subject to the Regulatory Position established in Section C to provide an acceptable method for meeting requirements for training and qualification of nuclear power plant personnel. Section C exceptions include conditions applicable to personnel performing activities within the scope of the quality assurance program described in NEI 06-14A.
b. RG **1.28,** Rev. **3,** August **1985,** "Quality Assurance Program Requirements (Design and Construction)" This regulatory guide describes a method acceptable to the NRC staff for complying with the provisions of Appendix B to 10 CFR Part 50 with regard to establishing and implementing the requisite quality assurance program for the design and construction of nuclear power plants. RG 1.28, Rev. 3 finds NQA-1-1983 subject to the Regulatory Position established in Section C to provide an acceptable method for use in implementing the requirements of Appendix B to 10 CFR Part 50 during the design and construction phase.
c. RG 1.33, Rev. 2, February 1978, "Quality Assurance Program Requirements (Operations)" This regulatory guide describes a method

acceptable to the NRC staff for complying with the provisions of Appendix B with regard to overall quality assurance program requirements for the operation of nuclear power plants. RG 1.33 finds ANSI N18.7- 1976/ANS 3.2 to provide an acceptable basis for overall quality assurance compliance with Appendix B to 10 CFR Part 50 subject to the Regulatory Position established in Section C.

17.5-8

In the Bell Bend FSAR, Section 17.5.1, the applicant states that the Bell Bend QAPD is submitted as Part 11 of the COL application and that the QAPD is applicable to the siting, design, fabrication, construction (including pre-operational testing), operation (including testing), maintenance and modification of the facility. Accordingly, the staff requests that the applicant (1) provide a clear statement in the FSAR as to when the QA program described in the Bell Bend QAPD (Part 11 of the application) will be implemented, and (2) add Bell Bend QAPD in Section 17.5.4, References, since the QAPD must be included or referenced in the FSAR.

Request for Additional Information No. 65
Application Revision 0

DRAFT

11/6/2009

Bell Bend
PPL Bell Bend LLC.
Docket No. 52-039
SRP Section: 14.02 - Initial Plant Test Program - Design Certification and New License Applicants
Application Section: 14.2

QUESTIONS for Quality and Vendor Branch 1 (AP1000/EPR Projects) (CQVP)

14.02-26

Standard Review Plan (SRP, NUREG-0800) Section 14.2.II.3.G.i, concerning acceptance criteria for combined license (COL) and operating license applicants, "Utilization of Reactor Operating and Testing Experiences in the Development of the Test Program," states that "[t]he applicant should provide a summary of the principal conclusions or findings from the review of operating and testing experiences at other reactor facilities and their effect on the test program. This review should recognize categories of reportable, repeatedly experienced occurrences and other operating experiences that could potentially impact the performance of the test program."

Section 14.2.8 of the applicant's FSAR incorporates, by reference, Section 14.2.8 of the U.S. EPR FSAR, which states that "[t]he design of the U.S. EPR is an evolutionary design. As such, the experience gained from previous successful startups is factored into the initial test program. This information reflects both AREVA NP operating and test experience and industry wide experience concerning pressurized water reactors. A summary will be developed to provide conclusions from this review and the effects on the test program."

The applicant's FSAR, however, does not state that the summary or review will contain recognized categories of reportable, repeatedly experienced occurrences and other operating experiences that could potentially impact the performance of the test program. The NRC staff requests that the applicant supplement the discussion in section 14.2.8 of its FSAR to describe in detail testing experiences at other reactor facilities and categories of reportable, repeatedly experienced occurrences and other operating experiences that could potentially impact the performance of the test program.

14.02-27

Section 14.2.II.3.H.ii of the SRP states that the applicant should provide additional operator training and participation based on the performance and evaluation of the test results of certain initial tests. An acceptable program will satisfy the criteria described in Three Mile Island (TMI) Action Plan Item I.G.1 of NUREG-0660 and NUREG-0737. Furthermore, RG 1.206.C.I.14.2.9 states that the COL applicant should provide a schedule for development of plant procedures as well as a description of how, and to what extent, the plant operating, emergency, and surveillance procedures will be use-

tested during the initial test program. In addition, the COL applicant should identify the specific operator training to be conducted as part of the use-testing during the special low-power testing program related to the resolution of TMI Action Plan Item I.G.1, described in NUREG-0660, NUREG-0694 and NUREG-0737. Furthermore, the COL Item identified in Section 14.2.9 of the U.S. EPR FSAR states that the COL applicant should identify the specific operator training to be conducted as part of the low-power testing program.

Section 14.2.9 of the applicant's COL identifies that to accomplish these goals; the emergency operating procedures will be performed on the plant simulator for procedure validation and operator training.

The NRC staff requests that the applicant revise Section 14.2.9 of its FSAR to include a provision that specific operator training and participation, based on the performance and evaluation of the test results of certain initial tests, will be conducted as part of the use-testing of the plant operating, surveillance, and emergency procedures during the initial test program, or to justify an alternative.