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UniStar
NUCLEAR ENERGY

10 CFR 50.4
10 CFR 52.79

December 4, 2009

UN#09-485

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: UniStar Nuclear Energy, NRC Docket No. 52-016
Response to Request for Additional Information for the
Calvert Cliffs Nuclear Power Plant, Unit 3,
RAI No. 192, Maintenance Rule

Reference: Surinder Arora (NRC) to Robert Poche (UniStar Nuclear Energy), "FINAL RAI No. 192 SPLA 3931" email dated November 19, 2009

The purpose of this letter is to respond to the request for additional information (RAI) identified in the NRC e-mail correspondence to UniStar Nuclear Energy, dated November 19, 2009 (Reference). This RAI addresses Maintenance Rule, as discussed in Section 17.6 of the Final Safety Analysis Report (FSAR), as submitted in Part 2 of the Calvert Cliffs Nuclear Power Plant (CCNPP) Unit 3 Combined License Application (COLA), Revision 6.

The enclosure provides our response to RAI No. 192, Question 17.06-2, and includes revised COLA content. A Licensing Basis Document Change Request has been initiated to incorporate these changes into a future revision of the COLA.

Our response does not include any new regulatory commitments and does not contain any sensitive or proprietary information.

D096
NRO

If there are any questions regarding this transmittal, please contact me at (410) 470-4205, or Mr. Michael J. Yox at (410) 495-2436.

*I declare under penalty of perjury that the foregoing is true and correct.*

Executed on December 4, 2009

Greg Gibson

Enclosure: Response to NRC Request for Additional Information No. 192, Question 17.06-2, Maintenance Rule, Calvert Cliffs Nuclear Power Plant, Unit 3

cc: Surinder Arora, NRC Project Manager, U.S. EPR Projects Branch
Laura Quinn, NRC Environmental Project Manager, U.S. EPR COL Application
Getachew Tesfaye, NRC Project Manager, U.S. EPR DC Application (w/o enclosure)
Loren Plisco, Deputy Regional Administrator, NRC Region II (w/o enclosure)
Silas Kennedy, U.S. NRC Resident Inspector, CCNPP, Units 1 and 2
U.S. NRC Region I Office

GTG/SFW/mdf

**Enclosure**

**Response to NRC Request for Additional Information No. 192**
**Question 17.06-2, Maintenance Rule**
**Calvert Cliffs Nuclear Power Plant, Unit 3**

**RAI No. 192**

**Question 17.06-2**

(Follow-up to Question 17.06-2 of RAI 62) The response to Question 17.06-2 of RAI 62 does not appear to be consistent with the most recent revision to the U.S. EPR FSAR as described by AREVA in its response to Question 17.06-1 of RAI 226 in the U.S. EPR design certification process. Specifically, in its response to RAI 226, AREVA added a new Section "17.6.7 Maintenance Rule Program Relationship with Industry Operating Experience Activities" to the U.S. EPR FSAR Tier 2, Section 17.6 and revised Table 1.8-2 to indicate a new section number for COL Item 17.6-8. Please modify the CCNPP Unit 3 COLA FSAR accordingly, or justify an alternative.

**Response**

U.S. EPR FSAR, Revision 1 does not contain an updated Section 17.6.7 addressing the Maintenance Rule Program relationship with industry operating experience (IOE) activities. As part of the response to U.S. EPR RAI 226, 17.06-2,[a] AREVA committed to revise U.S. EPR FSAR Table 1.8-2, Section 17.6.7, and Section 17.6.8 to address inclusion of IOE as part of the maintenance rule program implementation in a future revision.

Revision 6 of the Calvert Cliffs Nuclear Power Plant (CCNPP) Unit 3 COLA, FSAR Section 17.6 reflects the requirements of U.S. EPR FSAR, Revision 1. The CCNPP Unit 3 COLA will be revised to reflect the use IOE as part of the maintenance rule program implementation after it has been incorporated into U.S. EPR FSAR Section 17.6.

**COLA Impact**

FSAR Table 1.8-2 will be revised as follows in a future COLA Revision:

**Table 1.8-2-FSAR Sections that Address COL Items**

| Item No. | Description | Section |
|---|---|---|
| 17.6-8 | A COL applicant that references the U.S. EPR design certification will describe the plan or process for implementing the Maintenance Rule Program as described in the COL application, which includes establishing program elements through sequence and milestones and monitoring or tracking the performance and/or condition of SSC as they become operational. The Maintenance Rule Program will be implemented by the time that fuel load is authorized. | 17.6.~~7~~8 |

FSAR Section 17.6.7 will be revised as follows in a future COLA Revision:

**17.6.7 ~~MAINTENANCE RULE PROGRAM IMPLEMENTATION~~ MAINTENANCE RULE PROGRAM RELATIONSHIP WITH INDUSTRY OPERATING EXPERIENCE ACTIVITIES**

[a] R. Pederson (AREVA) to G. Tesfaye (NRC), "Response to U.S. EPR Design Certification Application RAI No. 226, FSAR Ch. 17," email dated 06/23/09 (ML091740758)

Maintenance rule program relationship with industry operating experience (IOE) activities is described in Section 17.7.4.

~~The U.S. EPR FSAR includes the following COL Item in Section 17.6.7:~~

~~A COL applicant referencing the U.S. EPR design certification will describe the plan or process for implementing the Maintenance Rule Program as described in the COL application, which includes establishing program elements through sequence and milestones and monitoring or tracking the performance and/or condition of SSC as they become operational.~~

~~This COL Item is addressed as follows:~~

~~Maintenance rule program implementation is described in Section 17.7.5.~~

FSAR Section 17.6.8 will be added as follows in a future COLA Revision:

**17.6.8 ~~REFERENCES~~ MAINTENANCE RULE PROGRAM IMPLEMENTATION**

~~{This section is added as a supplement to the U.S. EPR FSAR.~~

~~**NEI, 2008.** Generic FSAR Template Guidance for Maintenance Rule Program Description for Plants Licensed Under 10 CFR Part 52, NEI 07-02A, Revision 0, Nuclear Energy Institute, March 2008.}~~

The U.S. EPR FSAR includes the following COL Item in Section 17.6.7:

A COL applicant referencing the U.S. EPR design certification will describe the plan or process for implementing the Maintenance Rule Program as described in the COL application, which includes establishing program elements through sequence and milestones and monitoring or tracking the performance and/or condition of SSC as they become operational.

This COL Item is addressed as follows:

Maintenance rule program implementation is described in Section 17.7.5.

FSAR Section 17.6.9 will be added as follows in a future COLA Revision:

**17.6.9 REFERENCES**

{This section is added as a supplement to the U.S. EPR FSAR.

**NEI, 2008.** Generic FSAR Template Guidance for Maintenance Rule Program Description for Plants Licensed Under 10 CFR Part 52, NEI 07-02A, Revision 0, Nuclear Energy Institute, March 2008.}