BellBendCOLPEm Resource

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Sent: Thursday, December 03, 2009 2:44 PM
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Cc: BellBendCOL Resource; Miernicki, Michael; Crane, Samantha; Peralta, Juan
Subject: Bell Bend COLA - Request for Information No. 64 (RAI No. 64)- CQVP - 2813
Attachments: letter 64 - RAI 2813 CQVB.pdf

Attached is RAI No. 64 for the Bell Bend COL Application. Based on our discussion on 11/30/2009 we understand you have no questions on this RAI. You are requested to respond to this request on or before January 25, 2009. If additional time is required to respond, please inform me of your proposed schedule to respond at your earliest opportunity.

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
Email Number: 453

Mail Envelope Properties (77BCCD26C6050B42A72FE3939CF492ED162D32658C)

Subject: Bell Bend COLA - Request for Information No. 64 (RAI No. 64)- CQVP - 2813
Sent Date: 12/3/2009 2:43:39 PM
Received Date: 12/3/2009 2:43:41 PM
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Post Office: HQCLSTR01.nrc.gov

Files	**Size**	**Date & Time**
MESSAGE	926	12/3/2009 2:43:41 PM
letter 64 - RAI 2813 CQVB.pdf	27256	

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

Request for Additional Information No. 64

12/2/2009

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)

14.02-20

Section 14.2.II.3.A of the Standard Review Plan (SRP, NUREG-0800) “Initial Test Program [ITP] Administrative Procedures,” concerning design certification applications states that “[t]he [design certification] applicant should provide general guidance to control ITP activities, including administrative controls that will be used to develop, review, and approve individual test procedures, coordination with organizations involved in the test program, participation of plant operating and technical staff, and review, evaluation, and approval of test results.”

The applicant’s FSAR incorporates Section 14.2.1.1.1 of the U.S. EPR Design Certification application FSAR, “Construction Activities,” which states, in part, that “[s]pecific construction test requirements shall be established in accordance with the site administrative procedures.” The NRC staff requests that the applicant describe in detail the site-specific administrative controls for the turnover of systems to the startup organization.

14.02-21

SRP 14.2.I.3 states that a COL application referencing a standardized design must address COL action items. The applicant's COL FSAR lists the COL items in Table 1.8-2, "FSAR Sections that Address COL Items." Table 1.8-2 of the applicant's COL FSAR lists seven COL items for Chapter 14.2; however, Chapter 14.2 of the U.S. EPR FSAR identifies three additional COL items. Specifically, the U.S. EPR FSAR identifies additional COL Items in Subsection 14.2.4, "Conduct of Test Program," Subsection 14.2.9, "Trial Use of Plant Operating and Emergency Procedures," and Table 14.2-1 of the U.S. EPR FSAR, "List of Initial Tests for the U.S. EPR.”

The NRC staff requests that the applicant address all the COL information items identified in Section 14.2 of the U.S. EPR FSAR and revise Table 1.8.2 accordingly. The applicant can “address” a COL item either substantively or by explaining why the COL item does not apply to the COL application.

14.02-22

Standard Review Plan (SRP, NUREG-0800) Section 14.2.II.3.A.ii, concerning acceptance criteria for combined license (COL) and operating license applicants, “Management Organizations,” states that “[t]he applicant should provide (1) the

organizational descriptions for any augmenting organizations or other personnel who will manage or execute any phase of the test program, and (2) the responsibilities, interfaces, and authorities of the principal participants."

The applicant's FSAR, Section 14.2.2 "Organization and Staffing," states, in part, that "[t]he plant operating, maintenance, and engineering personnel are utilized to the extent practicable during the Startup Test Program. The plant staff operates permanently installed and powered equipment for Phases I through IV and subsequent system tests. Plant personnel such as instrument and controls, chemistry, computer, radiation protection, and maintenance personnel are used to perform tests and inspections in the areas in which they will primarily work during plant operation." Section 13.1 of the applicant's FSAR, "Organizational Structure of Applicant," provides some details on the roles and responsibilities of plant staff.

The NRC staff requests that the applicant supplement section 14.2.2 of its FSAR to describe in detail the responsibilities, interfaces, and authorities of the principal participants of the plant staff as they relate to the initial test program as described in the SRP, or to justify an alternative.

In addition, the applicant should address the following topics:

1) The position description for each manager that provides personnel to complete the ITP should include a statement that the manager will provide personnel to complete the ITP.

2) The ITP should state whether the preoperational/start-up engineers will be responsible for running preoperational and startup tests with plant personnel acting in a support role, or, if a different chain of command will be established, the ITP should describe it.

3) The ITP should state whether the start-up group or operations has the ultimate authority over the ITP.

4) The description of the engineering manager's responsibilities should indicate whether the engineering manager is part of the test review team (TRT).

5) Which organization has responsibility for fuel loading during the ITP?

6) Identify who will manage the workload of plant staff performing ITP and other duties.

7) Identify and describe the controls that will be in place to manage the workload of plant staff performing ITP and other duties.

14.02-23

Regulatory Guide (RG) 1.206, Section C.I.14.2.2, "Organization and Staffing," states that "the COL applicant should implement measures to ensure that personnel formulating and conducting test activities are not the same personnel who designed or are responsible for satisfactory performance of the system(s) or design features(s) being

tested." The applicant is asked to revise its FSAR to include such provisions or to justify an alternative.

14.02-24

SRP Section 14.2.II.3.A.i states that the applicant should provide organizational descriptions for principal management positions responsible for the planning, execution, and documentation of preoperational and startup testing activities.

Section 14.2.2 of the applicant's FSAR describes that organization and staffing. The Startup Organization consists of the Startup Manager, Startup Engineers and System Engineers. The Startup Organization is to be supplemented by plant personnel, architect - engineer (A/E) personnel and other contract/vendor staff as necessary to successfully complete the startup test program.

The NRC staff requests that the applicant confirm that sufficient managerial oversight and staffing is provided to complete the initial test program. If any additional managerial oversight is necessary to complete the initial test program, the staff requests that the applicant revise section 14.2.2 to provide an organizational description of any additional management positions; a description of the responsibilities, interfaces, and authorities of any additional management positions; and a description of the education, training, and experience requirements of any additional management positions.

14.02-25

Standard Review Plan (SRP, NUREG-0800) Section 14.2, paragraph II.3.D regarding COL applicants, "Staff Responsibilities, Authorities, and Qualifications," states that "[t]he applicant should describe the education, training, and experience requirements established for each management and operating staff member—including the NSSS vendor, architect-engineer, and other major contractors, subcontractors, and vendors, as appropriate—who will conduct the preoperational and startup tests and will develop testing, operating, and emergency procedures." In addition, the SRP states that "[t]he applicant should develop a training program for each functional group of employees in the organization relative to the schedule for preoperational testing and initial startup testing to ensure that the necessary plant staff are ready to begin the test program."

The applicant's COL application, in Section 14.2.2, "Organization and Staffing," describes the roles and responsibilities of the start-up organization, which includes the startup manager, system engineers, startup engineers, plant personnel, architect-engineer personnel, other contract/vendor staff, and the Areva site startup organization. Section 14.2.2 references Section 13.1, "Organizational Structure of Applicant," for further details on startup organization. Table 13.1-1 in Section 13.1 Lists the projected staffing levels for the startup organization, which includes the startup manager, preoperational test engineer, and startup engineer. Table 13.1-1 also references ANS-3.1-1993 for the general description, necessary education, minimum experience, and special qualifications for the preoperational test engineer and the startup engineer.

The NRC staff requests that the applicant describe the education, training, qualification, and experience necessary for employees and managers of organizations responsible for the conduct of preoperational and startup tests and organizations that will develop testing, operating, and emergency procedures. In addition the NRC staff requests the applicant to provide a general description of how it will develop a training program for each functional group of employees in the organization relative to the schedule for preoperational testing and initial startup testing to ensure that the necessary plant staff is ready to begin the test program. Should the applicant seek to implement an alternative with respect to each of the above topics, the applicant should justify the alternative.

In addition, the NRC staff requests that the applicant either confirm that the System Engineer and Preoperational Test Engineer are the same position and address the apparent discrepancy in the title of the position in Section 14.2.2 and Table 13.1-1. If the System Engineer is a separate position, identify the education, training, and experience prerequisites established for that position, and describe the roles and responsibilities associated with the Preoperational Test Engineer position.