

January 26, 2010

MEMORANDUM TO: Joseph Colaccino, Chief  
EPR Projects Branch  
Division of New Reactor Licensing  
Office of New Reactors

FROM: Tarun Roy, Project Manager */RA/*  
EPR Projects Branch  
Division of New Reactor Licensing  
Office of New Reactors

SUBJECT: SUMMARY OF OCTOBER 8, 2009, PUBLIC MEETING WITH THE  
U.S. EPR DESIGN CENTER WORKING GROUP

On October 8, 2009, the U.S. Nuclear Regulatory Commission (NRC) held a public meeting at One White Flint North, 11545 Rockville Pike, Rockville, MD, with representatives of the U.S. EPR Design Center Working Group (DCWG). The purpose of the meeting was to discuss cross-cutting issues related to the U.S. EPR Design Center. The meeting agenda is provided as the enclosure.

This meeting summary is available through the Agencywide Documents Access and Management System (ADAMS) Accession Number ML100250670. The presentation materials distributed at the meeting are contained in ADAMS ML092670350. Documents in ADAMS are available electronically at the NRC's Electronic Reading Room at <http://www.nrc.gov/reading-rm/adams.html>. If you do not have access to ADAMS or have problems accessing the documents located in ADAMS, contact the NRC Public Document Room (PDR) staff at 1-800-397-4209, 301-415-4737, or [pdr@nrc.gov](mailto:pdr@nrc.gov).

The meeting was a Category 2 public meeting, during which members of the public were invited to provide comment at specific times identified in the agenda. The meeting lasted from 8:30 a.m. to 2:15 PM. A summary of the subjects covered and respective findings is provided in the following sections.

#### NRO Management Perspective

The Acting Deputy Director of the Division of New Reactor Licensing (DNRL) Mohammed Shuaibi and the Deputy Director of the Division of site and Environmental reviews (DSER) Nilesh Chokshi spoke on the licensing process with regard to the current schedule and issue of draft Interim Staff Guidance (ISG) on seismic margins.

Mohammed Shuaibi expressed NRC management's commitment to participate in the U.S. EPR Design Center Working Group (DCWG) meetings to address, at an early stage, issues that may affect the licensing process. Members of the DCWG were encouraged to use this management-level forum in addition to ongoing interactions at the staff level. UniStar confirmed that this type of interaction is considered helpful.

Nilesh Chokshi recommended that the DCWG submit comments on the draft interim staff guidance (ISG) on seismic margins. The DCWG stated they were planning to submit comments.

#### Use of Regulatory Guide (RG) 1.97, "Criteria for Post Accident Monitoring Instrumentation (PAM) for Nuclear Power Plants"

The DCWG requested that they have a phone call regarding conformance with Revision 4 to RG 1.97 in COL applications. Specifically, following the guidance in RG 1.97 would necessitate the development of emergency operating procedures, which will not be available until after the license is issued. Unistar proposed to develop a Technical Specification (TS) list based on review of safety analysis, operating experience, and Probabilistic Risk Assessment (PRA) against criteria provided in 10 CFR 50.36.

#### Use of High Density Polyethylene Piping (HDPE) in U.S. EPR ASME Class 3 Applications

UniStar plans to submit a proprietary Topical Report (TR) to address the use of HDPE piping following the guidance provided in Code Case N-755. If approved, the combined license (COL) applications referencing the U.S. EPR would be revised to reference this topical report. Unistar stated that the COL applications currently referencing the U.S. EPR are complete and do not require approval of the topical report.

NRC staff pointed out that the Code Case N-755, which would allow use of HDPE pipe, is currently under revision. Furthermore, Code Case N-755 has not yet been approved by the NRC as a sufficient qualification methodology. Discussions on the adequacy of Code Case N-755 is ongoing within NRC.

Review of the TR, which UniStar expects to submit, will have to be coordinated with the existing schedules for the reference combined license applications (RCOLA) and subsequent combined license applications (SCOLAs). The staff asked UniStar for a detailed list of all systems that are intended for use of HDPE pipe and which systems would constitute a departure from the submitted design in the U.S. EPR Final Safety Analysis Report (FSAR). AREVA stated that this matter will be handled as site-specific and will not affect the U.S. EPR FSAR. Unistar provided a list of systems where HDPE piping is being considered for use.

#### Cyber Security-Safety and Security Interface:

NRC staff advised in their presentation that although ISG-04 allows bi-directional communications between the safety system and other non safety plant systems, the COL applications referencing the U.S. EPR design also need to address the following to meet the requirements of 10 CFR 73.54:

- Ensure that any non-safety equipment (including the supporting networks) communicating to safety systems is also afforded level 4 protection.
- Demonstrate that cyber risks are managed for this non-safety equipment by addressing the security controls in Appendix B and Appendix C of RG 5.7.1.
- Ensure any changes to this non safety equipment undergo a security assessment to ensure that the security of this equipment is not impacted by the proposed changes.

Unistar and AREVA proposed a presentation strategy for Cyber Security in the next DCWG Meeting, and will involve nuclear security and incident response (NSIR) in a future meeting.

#### COL Issuance and Related Processes

UniStar requested additional information about COL issuance and related processes in areas of rulemaking, hearing schedule, and COL issuance (final phases and steps required after Phase 6). The staff will put this on the agenda for a future DCWG meeting.

#### Calvert Cliffs (COL) site-specific Inspections, tests, and analysis (ITAAC)

NRC staff and consultants provided feedback regarding some perceived inconsistencies and interpretation issues related to inspectability of the site-specific ITAAC for the Calvert Cliffs RCOL application. While specific to the Calvert Cliffs application, the comments were intended to be of a general nature and would apply to all EPR applications. NRC staff recommended that all COL applicants review Regulatory Issue Summary (RIS) 2008-05, "Lessons Learned to Improve Inspections, Tests, Analyses, and Acceptance Criteria Submittal."

#### Applications Revision Schedules, and Audit look ahead.

The staff discussed its position regarding COL application update requirements. Specifically, the staff revisited the stipulations in 10 CFR 52.3(b) (6) and 10 CFR 50.71(e) (3) (iii). The staff explained its position regarding the annual FSAR update requirement, and stated that "annually" was to be interpreted as once every calendar year. The staff provided a couple of scenarios to clarify this interpretation. Additionally, the staff stated that whether an application review has been suspended or not was irrelevant to the schedule set out in the updating requirement, so long as the application remains on the docket.

#### Closing & Actions

##### NRC Closed Items:

- UniStar provided a list of systems where HDPE piping is being considered for use.
- COLA Freeze Point was discussed at this meeting.
- RG 1.97 Phone call with Design Center Working Group (DCWG) was held.
- NRC discussed frequency of standard question endorsements.
- UniStar contacted Division of construction inspection and Operational Programs (DCIP) and is working on means of updating vendor inspections.

New and open actions items for EPR DCWG

- UniStar will review NRC comments on Calvert Cliffs-specific ITAAC and bring plans for revising ITAAC at future DCWG meeting.
- Bell Bend will submit a standard question endorsement letter to minimize potential for duplicate RAIs.
- DCWG will review Nuclear Energy Institute (NEI) topical reports and discuss impact on COLA schedules at future DCWG/NRC meeting.
- DCWG will present plans for cyber-security at a future DCWG/NRC meeting.
- NRC advised that the DCWG submit comments on the COLA Freeze Point white paper
- NRC recommended that the DCWG submit comments on the draft ISG on seismic margins

The next meeting is planned for January 28, 2010

Members of the public were in attendance. The attendee list is provided. No public feedback forms were received. Please direct any inquiries concerning this meeting to [Tarun.Roy@nrc.gov](mailto:Tarun.Roy@nrc.gov).

Docket No.: 52-020

Enclosures:  
Meeting Agenda and Attendee List

cc: U.S. EPR DCWG Mailing List

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## ATTENDANCE SHEET

EPR Design Center Working Group (DCWG) Meeting  
NRC Room OWFN 04-B6  
October 08, 2009 (8.30 AM – 2.15 PM)

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NRC Room OWFN 04-B6

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## Conference Call

[illegible]

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(Revised 12/15/2009)

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