PMSTPCOL NPEmails

From: Tai, Tom
Sent: Saturday, March 13, 2010 7:22 AM
To: Dixon-Herrity, Jennifer
Cc: Li, Yueh-Li; Hernandez, Raul; Ng, Ching; Segala, John; Lee, Samuel; Wunder, George; Tonacci, Mark; STPCOL
Subject: FW: RAI 03.06.01-3
Attachments: RAI 03.06.01-3_draft response.doc

Jennifer,

Attached for your information is STP's proposed response to address the submittal of the pipe break report in RAI 4087 (which supplemented 3209 (03.06.01-2) and 129 (03.06.01-1)). The latest proposal consists of:

1. Revising COL FSAR 3.6.5.1 COL License Information to include a statement that the report will be submitted to the NRC prior to installation of HE piping;

2. Revise the COL FSAR Part 9 to add a site specific ITAAC in Table 3.0-14 to address the as-designed plant;

3. The RAI response states that the schedule to complete the report is 2012 (same approach as RAI 03.12-2).

Please let me know if this is acceptable. If necessary, we can arrange a telecon with STP.

Tom Tai
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Tom.Tai@NRC.GOV

From: Chappell, Coley [mailto:ccchappell@STPEGS.COM]
Sent: Friday, March 12, 2010 2:48 PM
To: Tai, Tom
Subject: RAI 03.06.01-3

Tom,

See attached draft file. Note the additional paragraph regarding schedule.

Regards,

Coley Chappell
STP 3 & 4 Licensing

Hearing Identifier: SouthTexas34NonPublic_EX
Email Number: 2771

Mail Envelope Properties (0A64B42AAA8FD4418CE1EB5240A6FED10E15FB81DE)

Subject: FW: RAI 03.06.01-3
Sent Date: 3/13/2010 7:22:02 AM
Received Date: 3/13/2010 7:22:04 AM
From: Tai, Tom

Created By: Tom.Tai@nrc.gov

Recipients:
"Li, Yueh-Li" <Yueh-Li.Li@nrc.gov>
Tracking Status: None
"Hernandez, Raul" <Raul.Hernandez@nrc.gov>
Tracking Status: None
"Ng, Ching" <Ching.Ng@nrc.gov>
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Tracking Status: None
"Lee, Samuel" <Samuel.Lee@nrc.gov>
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"Wunder, George" <George.Wunder@nrc.gov>
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"STPCOL" <STP.COL@nrc.gov>
Tracking Status: None
"Dixon-Herrity, Jennifer" <Jennifer.Dixon-Herrity@nrc.gov>
Tracking Status: None

Post Office: HQCLSTR02.nrc.gov

Files	**Size**	**Date & Time**
MESSAGE	1127	3/13/2010 7:22:04 AM
RAI 03.06.01-3_draft response.doc	83010	

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

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RAI 03.06.01-3

QUESTION:

The RAI described below is the supplemental RAI for RAI 129, 03.06.01-1, and for RAI 3209, 03.06.01-2.

In the response to (E-RAI 3209) RAI 03.06.01 -2, the applicant stated:

> *"As summarized in the FSER, the piping DAC clearly cover the aspects of the design of the piping system necessary for issuance of the design certification. The DCD includes the ITAAC that were determined to be necessary to support the safety determination for the ABWR piping."*

The applicant's response also states that:

> *"As such, it is clear that the Pipe Break Analysis Report will be prepared for the as-designed condition, as well as requiring reconciliation of the as-built condition. Although ITAAC 3.3.2 states in the acceptance criteria that the Pipe Break Analysis Report must exist for the as-built plant, this DAC is a requirement for the final product, which includes the design basis and the asbuilt reconciliation."*

The applicant's response stated that the piping design acceptance criteria (DAC) are a requirement for the final product which includes the design basis and the as built reconciliation. However, the staff notes that the DAC as identified in DCD Tier 1 ITAAC 3.3.2 and as defined in Table 7, "Piping Design Acceptance Criteria", of the ABWR DCD Introduction, does not cover the full scope of the pipe break analysis report as identified in DCD Tier 2 Subsection 3.6.5.1.

The staff still considers that the latest applicant RAI response is not acceptable. Therefore the staff maintains requests the applicant to complete and submit the as-designed Pipe Break Analysis Report within the COL review phase; or to propose a site-specific ITAAC to address the as-designed Pipe Break Analysis Report with a license condition that provides a description pertaining to the closure schedule of the report; or an acceptable alternative.

RESPONSE:

STPNOC believes that ITAAC 3.3.2 encompasses the pipe break analysis report including both as-designed and as-built piping. Nevertheless, to resolve this issue, STPNOC will propose a new site-specific ITAAC to clearly indicate that this matter is within the scope of the ITAAC.

STPNOC will provide a new site-specific ITAAC in COLA Part 9 to provide a specific post-COL requirement related to the as-designed Pipe Break Analysis Report.

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COLA Part 9, Section 3.0 will be revised in a future COLA revision to incorporate the new site-specific ITAAC as noted above. COLA FSAR Section 3.6.5.1 will be revised to include reference to this new site-specific ITAAC, and to state that the as-designed Pipe Break Analysis Report will be available prior to installation of the high-energy piping described in FSAR Section 3.6.

The current schedule shows the high energy pipe break analysis report for the as-designed plant will be completed and ready for review by the end of 2012. This is prior to the scheduled installation of any of the high energy lines addressed in the report. The end of 2012 represents the current completion date from the integrated project schedule and is subject to potential future adjustments. As part of our periodic issuance of the project schedule and ITAAC schedule to the NRC, the NRC will be informed of any required changes.

The changes to COLA Revision 3 are shown below, with changes highlighted in gray shading.

COLA Part 2 Tier 2 revisions:

3.6.5.1 **Details of Pipe Break Analysis Results and Protection Methods**

The following standard supplemental information addresses COL License Information Item 3.16.

The details of pipe break analysis results and protection methods will be provided for NRC review as part of ~~the~~ ITAAC Table 3.3 Item 2 in the reference ABWR DCD Tier 1 Section 3.3. A pipe break analysis report for the as-designed plant will be available for NRC review as part of site-specific ITAAC Table 3.0-14 Item 1 in COLA Part 9. This report for the as-designed plant will be available prior to the installation of high-energy piping described in this section.

COLA Part 9 revisions:

3.0 Site-Specific ITAAC

The STP 3 & 4 site-specific systems and activities that require ITAAC because they have a safety-related, safety-significant, or risk significant function are listed below:

- Breathing Air (BA) System
- Pipe Break Analysis Report for the As-designed Plant

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Table 3.0-14 Pipe Break Analysis Report for the As-designed Plant

Design Requirement	Inspections, Tests, Analyses	Acceptance Criteria
1. Systems, structures, and components, that are required to be functional during and following an SSE, shall be protected against or qualified to withstand the dynamic and environmental effects associated with postulated failures in Seismic Category I and NNS piping systems. Each postulated piping failure shall be documented in a Pipe Break Analysis Report.	1. Inspections of the Pipe Break Analysis Report will be conducted.	1. A Pipe Break Analysis Report exists for the as-designed plant and concludes that for each postulated piping failure, the reactor can be shut down safely and maintained in a safe, cold shutdown condition without offsite power.

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