

## ArevaEPRDCPEm Resource

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**Sent:** Monday, April 12, 2010 3:47 PM  
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**Subject:** Draft - U.S. EPR Design Certification Application RAI No. 389 (4615), FSAR Ch. 6  
**Attachments:** Draft RAI\_389\_SPCV1\_4615.doc

Attached please find draft RAI No. 389 regarding your application for standard design certification of the U.S. EPR. If you have any question or need clarifications regarding this RAI, please let me know as soon as possible, I will have our technical Staff available to discuss them with you.

Please also review the RAI to ensure that we have not inadvertently included proprietary information. If there are any proprietary information, please let me know within the next ten days. If I do not hear from you within the next ten days, I will assume there are none and will make the draft RAI publicly available.

Thanks,  
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Request for Additional Information No. 389(4615), Revision 1

4/12/2010

U. S. EPR Standard Design Certification

AREVA NP Inc.

Docket No. 52-020

SRP Section: 06.02.02 - Containment Heat Removal Systems

Application Section: FSAR Chapter 6

QUESTIONS for Containment and Ventilation Branch 1 (AP1000/EPR Projects) (SPCV)

06.02.02-47

In the revised GOTHIC model the fluid entering the core is limited to that which is boiled away by decay heat plus 5% of the total ECCS flow. The 5% of ECCS fraction is assumed to be carried out of the core as liquid. One quarter of this liquid flow is assumed to be turned to steam as the remaining sensible heat is removed from the reactor system metal above the reactor vessel nozzles and from the broken loop steam generator metal and fluid. This steam flows into the containment building and acts to pressurize the containment. The remaining three quarters of the liquid flow is assigned to the intact loops where any steam produced is condensed by the ECCS water injected in the cold legs. The NRC staff requested additional justification for the 5% of total ECCS flow entrainment assumption. See RAI 221 06.02.01-35a. The NRC staff questioned the validity of the assumed equal flow split. See RAI 221 06.02.01-35b.

AREVA responded to these RAIs by comparing the integrated heat flow to the steam and to the liquid in the reactor system between the GOTHIC reactor system model and that calculated by RELAP5-BW. The RELAP5-BW analysis does not assume the loop seals to be blocked and calculates its own liquid entrainment and flow split. The staff has not accepted the M&E results from RELAP5 beyond the time when AREVA assumes that the intact loop seals could be blocked in ANP-100299P Rev. 2. This is because RELAP5-BW may calculate the steam source to the containment to be too low because of non-conservative assumptions for steam condensation in the cold legs beyond the time when the intact loop seals could be blocked.

The staff therefore requests that AREVA calculate the M&E source for cold leg breaks using phenomenological considerations for two phase level swell in the core and to assume that all steam and water carried out of the reactor vessel travels out of the broken loop after the time when the loop seals in the intact cold legs are blocked. With the revised M&E source, calculate the containment pressure for cold leg breaks using AREVA's multi-noded GOTHIC containment model.

06.02.02-48

FOLLOW-UP TO RAI 297, QUESTION 06.02.01-49.

Redundancy and diversity of the mixing damper opening signal is briefly mentioned in Response to RAI 297, Question 06.02.01-49; namely:

“The opening signal is provided by diverse means – either eight redundant delta pressure sensors or two redundant absolute pressure measurements sensors”

The CONVECT system is a safety-related system. The mixing dampers are part of the CONVECT system. Provide to the following additional information:

- a. Has a failure mode analysis of the mixing dampers been performed? Where is the failure mode analysis documented? Describe these evaluations.
- b. What is the actuation logic of the eight delta pressure sensors? What signal is needed to open the dampers? Is the delta pressure signal one directional?
- c. Will the delta pressure signal open dampers if the break is in the annular space? What restrictions are placed on plant operation if one of the absolute pressure sensors is out of order?
- d. Have potential common mode failure of the mixing dampers been addressed? Where is the common mode failure analysis documented? Describe these evaluations.

#### 06.02.02-49

In case of a postulated DBA, containment heat removal is a major safety function. Appropriate systems must be provided, and the capacity of the systems must be evaluated. Section 6.2.2 of the FSAR is the appropriate place for description of the containment heat removal systems, the performance evaluation of the systems and the demonstration of compliance with GDC 38.

U.S. EPR, Tier 2, Section 6.2.2 provides only a general description of containment heat removal following DBAs. It references Section 6.2.1 for containment pressure and temperature response calculations, and Section 6.3 for the design, inspection and testing of the SIS, and for sump screen blockage. This is important information, but not sufficient for an independent evaluation of the containment heat removal systems. More detail is needed

The FSAR should have, preferably in Section 6.2.2, the following information. If some of the information is provided in another section of the FSAR, this section should be referenced. Conclusions reached on containment heat removal systems should be summarized in Section 6.2.2. Safety systems frequently perform more than one function, in Section 6.2.2 the emphasis should be on short and long term containment cooling.

Provide the following information in the FSAR in accordance with RG 1.206:

- a. General description of containment heat removal, identification of safety systems performing this function.
- b. Detailed description of each system, safety classification of components of the system.

- c. Identification of potential single active and single passive failures of the system, including common mode failures. Evaluation of the effects of these failures on containment heat removal.
- d. Specification of design features of the heat removal systems that permit periodic inspection of components and periodic testing of the systems.
- e. Analysis of the heat removal capacity of each system.
- f. Evaluation of potential surface fouling of the LHSI heat exchangers in the recirculation system.

#### 06.02.02-50

One of the main mechanisms for containment heat removal is the concrete heat structures within the containment building.

- a. The amount of heat transferred to these structures depends on the assumed thermal conductivity and heat capacity of the concrete. Structural concrete used at different sites differ in properties which may change as the concrete ages. The change in properties with aging is a function of the environment to which the concrete is exposed.

The GOTHIC containment calculations used a conductivity of 1.012 BTU/hr-ft-F for concrete and a heat capacity of 0.22928 BTU/lbm-°F. Document the source of this information. Justify the selection of the concrete properties used in the GOTHIC calculations cover all potential construction sites in the U.S. Describe the inspections which will be conducted to ensure that the containment concrete for each site will adsorb at least as much heat as assumed in the FSAR. Describe the surveillances which will be performed to ensure that the concrete properties do not change with time so as to provide less heat absorption capability than that assumed in the FSAR.

- b. The amount of heat transferred to the containment concrete shell is dependent on the gap thickness between the liner and the concrete. A value of 3 mm was listed in the FSAR Table 6.2.1-4. Justify the selection of this gap thickness. Describe the inspections which will be conducted to ensure that the liner to concrete gap thickness at each site will not exceed that assumed in the GOTHIC calculations. Describe the surveillances which will be performed to ensure that the gap thickness does not change with time so as to provide less heat absorption capability as that assumed in the GOTHIC calculations.

#### 06.02.02-51

Interim FSAR Revision 2 Table 6.2.1-25, "MSLB Reactor Trip and Isolation Signal Summary" includes steam generator isolation on high containment pressure to mitigate small steam line breaks. Include this signal in the steam generator isolation discussions of FSAR Chapter 7.3 "Engineered Safety Features Systems".