

PMComanchePeakPEm Resource

From: Monarque, Stephen
Sent: Wednesday, August 25, 2010 3:59 PM
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Cc: ComanchePeakCOL Resource; Otto, Ngola
Subject: Comanche Peak RCOL Chapter 14, Section 14.2 - RAI Number 173
Attachments: RAI 4682 (RAI 173).docx

The NRC staff has identified that additional information is needed to continue its review of the combined license application. The NRC staff's request for additional information (RAI) is contained in the attachment. Luminant is requested to inform the NRC staff if a conference call is needed.

The response to this RAI is due within **35** calendar days of August 25, 2010.

Note: If changes are needed to the safety analysis report, the NRC staff requests that the RAI response include the proposed changes.

thanks,

Stephen Monarque
U. S. Nuclear Regulatory Commission
NRO/DNRL/NMIP
301-415-1544

Hearing Identifier: ComanchePeak_COL_Public
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Request for Additional Information (RAI) No. 4682, COLA Revision 1

RAI Number 173

8/25/2010

Comanche Peak Units 3 and 4
Luminant Generation Company, LLC.
Docket No. 52-034 and 52-035

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)

14.02-19

Consistent with the guidance in RG 1.206, Regulatory Position C.III.4.3, "Combined License Information Items That Cannot Be Resolved Before the Issuance of a License," the applicant identified in Comanche Peak Nuclear Power Plant (CPNPP) Units 3 and 4 FSAR Table 13.4-201, "Operational Programs Required by NRC Regulation and Program Implementation," Item 19, Initial Test Program (ITP) activities that will be subject to a license condition. In addition to the ITP activities identified in Table 13.4-201, the NRC staff has identified the following post-COL items in FSAR Section 14.2.13, "COL Information Items" as license conditions. Accordingly, Luminant is requested to implement these license conditions.

License Conditions for Post Combined License (COL) Items

License Condition for Preoperational and Startup Test Specifications and Procedures, US-APWR DCD Section 14.2.13, COL License Information

During the post-licensing period, preoperational and startup test specification, and test procedures will be subject to a license condition for NRC inspections to verify that the licensee implements the ITP. This process will allow for the performance of necessary plant as-built inspections and walk downs. The licensee will make available to on-site NRC inspectors preoperational and startup test specifications and test procedures 60 days prior to their intended use.

License Condition for Preoperational and Startup Test Specifications and Procedures, US-APWR DCD Section 14.2.13, COL License Information

Prior to initiating the plant's ITP, a site specific startup administration manual (SAM) (procedures), which includes administrative procedures and requirements that govern the activities associated with the plant ITP is to be provided to on-site NRC inspectors.

License Condition for the Power Ascension Test Phase, US-APWR DCD Section 14.2.13, COL License Information, COL Item 14.2,

Certain milestones in the startup testing phase of the ITP (e.g., pre-critical testing, criticality testing and low-power testing) should be controlled through this license condition to ensure that the designated licensee management reviews, evaluates, and

approves relevant test results before proceeding to the power ascension test phase. Accordingly, the licensee shall perform the following:

- (a) Complete all pre-critical and criticality testing and confirm that the test results are within the range of values predicted in the FSAR acceptance criteria. After completing and evaluating criticality test results, the licensee will conduct low-power tests and will operate the facility at reactor steady-state core power levels not in excess of 5 percent power, in accordance with the conditions of the license.
- (b) Complete all low-power testing and confirm that the test results are within the range of values predicted in the acceptance criteria in the facility's FSAR. After completing and evaluating low-power test results, the licensee will conduct power ascension testing and will operate the facility at reactor steady-state core power levels not in excess of 100 percent power, in accordance with the conditions of the license.

The licensee is responsible for the review and evaluation of the adequacy of these test results, as well as final review of overall test results. Test results, which do not meet acceptance criteria, are identified and corrective actions and retests are performed. These results shall be made available to on-site NRC inspectors.

License Condition for the Test Program Schedule, US-APWR DCD Section 14.2.13, COL License Information, COL Item 14.2

Prior to initial fuel load, the licensee shall submit a schedule, no later than 12 months after issuance of the COL, and updated every 6 months until 12 months before scheduled fuel loading, and every month thereafter until either the operational program for the ITP in Comanche Peak Nuclear Power Plant (CPNPP) COL FSAR Table 13.4-201, Item 19, has been fully implemented or the plant has been placed in commercial service, whichever comes first. This schedule shall support implementation details of the ITP and planning for the conduct of NRC inspections of operational programs listed in the operational program CPNPP COL FSAR Table 13.4-201, Item 19.

License Condition for Test Changes

Within one month of any ITP changes described in CPNPP Units 3 and 4 FSAR Section 14.2, the licensee shall evaluate these changes in accordance with the provisions of 10 CFR 50.59 or Section VIII of Appendix A to 10 CFR Part 52 and report them in accordance with 10 CFR 50.59(d).