CCNPP3eRAIPEm Resource

From: Arora, Surinder
Sent: Thursday, September 16, 2010 8:03 AM
To: 'Poche, Robert'; 'cc3project@constellation.com'; Scott, Roger D
Cc: CCNPP3eRAIPEm Resource; Kowal, Mark; DeMarshall, Joseph; Colaccino, Joseph; Biggins, James; Vrahoretis, Susan; Hearn, Peter; Chazell, Russell
Subject: FINAL RAI 260 CTSB 5000
Attachments: FINAL RAI 260 CTSB 5000.doc

Rob,

Attached please find the subject request for additional information (RAI). The draft of this RAI was sent to you on August 19, 2010. A clarification phone call requested by UniStar was held on September 15, 2010, which resulted in no changes to the draft RAI questions.

The schedule we have established for review of your application assumes technically correct and complete responses within 30 days of receipt of RAIs. For any RAIs that cannot be answered within 30 days, it is expected that a schedule date for submitting your technically correct and complete response will be provided to the staff within the 30 day period so that the staff can assess how this information will impact the review schedule.

Your response letter should also include a statement confirming that the response does or does not contain any sensitive or proprietary information.

Thanks.

SURINDER ARORA, PE
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Created By: Surinder.Arora@nrc.gov

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"CCNPP3eRAIPEm Resource" <CCNPP3eRAIPEm.Resource@nrc.gov>
Tracking Status: None
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Request for Additional Information No. 260 (eRAI 5000)

9/16/2010

Calvert Cliffs Unit 3
UniStar
Docket No. 52-016
SRP Section: 16 - Technical Specifications
Application Section: SRP 16

QUESTIONS for Technical Specification Branch (CTSB)

16-22

This RAI is in response to the applicant's response to follow-up RAI 190, Question 16-20 (RAI 190, Question 16-20 was a follow-up to RAI 95, Questions 16-1 and 16-2).

Part B

Section 1.8.2, DEPARTURES

1. The Setpoint Control Program (SCP) Administrative Technical Specification (TS) reference that was deleted under the list of departures table included in Section 1.8.2, "Departures," should be retained. The SCP is a Departure from the EPR GTS that will require staff approval via an exemption from the future Design Certification Rule (DCR). Note that although the SCP is a Departure, Tier 2 Departure Evaluation criteria do not apply.

Section 1.2, EXEMPTION REQUESTS (1.2.8, Generic Technical Specifications and Bases - Setpoint Control Program)

1. References to "Limiting Trip Setpoints and Design Limits" in the first, second, and final paragraphs of Section 1.2.8, "Generic Technical Specifications and Bases - Setpoint Control Program," may need to be revised to accurately reflect information in DCD Table 3.3.1-2 (Protection System LCO 3.3.1) which has not yet been finalized.

Part C

Section 14, TS 5.5.18, SETPOINT CONTROL PROGRAM (Plant Specific Technical Specifications)

1. Applicable steps of the SCP TS need to be revised to accurately reflect the surveillance testing strategy proposed for the digital U.S. EPR Protection System, the basis of which is the performance of calibrations limited solely to those analog components subject to drift. This surveillance testing strategy was described by AREVA during public meetings conducted on April 27, 2010 and April 28, 2010.

2. The SCP TS requires that there be an NRC approved instrumentation setpoint methodology for all automatic protection instrumentation setpoints related to

variables having significant safety functions. This includes setpoints related to variables having significant safety functions on which a Safety Limit (SL) has been placed, and setpoints related to variables having significant safety functions but which do not protect Safety Limits in the EPR TS. This is necessary in order to ensure that the automatic protection instrumentation setpoints for all significant safety functions (SL and non-SL variables) specified in the Plant Specific Technical Specifications (PTS) will be subject to the requirements of the proposed SCP. NRC approved setpoint methodologies to be referenced in the SCP TS for automatic protection instrumentation setpoints not directly related to the protection of a Safety Limit, could be addressed by (1) revising ANP-10275P-A, "U.S. EPR Instrument Setpoint Methodology Topical Report," to include the methodologies, or (2) developing a dedicated report that would detail the methodologies. Development of a dedicated setpoint methodology report would be the responsibility of either AREVA or UniStar.

3. Specific references to the Core Operating Limits Report (COLR) and the Pressure and Temperature Limits Report (PTLR) Specifications in step 5.5.18.b of the SCP TS, do not adequately address the requirement to specify the NRC approved setpoint methodology used to determine the setpoint values for the automatic protection instrumentation functions in Table 3.3.1-2 of the U.S. EPR GTS delineated by footnotes stating (1) "As specified in the COLR," and (2) As specified in the Pressure-Temperature Limits Report." The COLR and PTLR setpoint methodologies associated with the setpoint values for these functions must be approved by the NRC and need to be identified and specified explicitly, not only in step 5.5.18.b of the SCP TS, but also, as applicable, in Core Operating Limits Report Section 5.6.3.b, and Reactor Coolant System Pressure and Temperature Limits Report Section 5.6.4.b, of Administrative TS Reporting Requirements Section 5.6.

4. The following statement added at the end of SCP TS step 5.5.18.b is confusing and the reason for its incorporation not understood: "The LTSP, NTSP, AV, PTAC, and ALT for other Technical Specification required automatic protection instrumentation functions shall be calculated in conformance with the instrumentation setpoint methodology documented and justified in the Setpoint Control Program."

5. Relocation of the term "required" in steps 5.5.18.c, 5.5.18.d, and 5.5.18.e of the SCP TS, to reflect the scope of functions that require trending and evaluation, and the scope of the setpoints specified in the document to be established by the SCP, is confusing on the basis that (1) inconsistencies exist between the referenced steps and step 5.5.18.b of the SCP TS which reads: "The Limiting Trip Setpoint (LTSP), Nominal Trip Setpoint (NTSP), Allowable Value (AV), Performance Testing Acceptance Criteria (PTAC), and As-Left Tolerance (ALT) for each applicable Technical Specification required automatic protection instrumentation function …," and (2) the automatic protection instrumentation setpoints for all significant safety functions (SL and non-SL variables) specified in the PTS are subject to the requirements of the proposed SCP (i.e., NRC approved setpoint methodology, trending and evaluation).

6. Guidance associated with permissive settings needs to be incorporated into steps 5.5.18.b and 5.5.18.e of the SCP TS to reflect the fact that permissives are stated values.

7. The wording for Surveillance Requirement (SR) 3.3.1.9 in the Surveillance Requirements Section of LCO 3.3.1, Protection System, needs to be revised to include a reference to the SCP. The associated Bases discussion for SR 3.3.1.9 needs to be revised accordingly and the Bases reference to LTSP should be replaced by NTSP.

Section 17, BASES, PROTECTION SYSTEM (PS) (Plant Specific Technical Specifications)

1. Item g; the Bases discussion associated with SR 3.3.1.4 needs to be revised to include a reference to the permissive values.

2. Item h; the Bases discussion associated with SR 3.3.1.6 needs to be revised to include a reference to the permissive values.