

## CCNPP3eRAIPEm Resource

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**From:** Steckel, James  
**Sent:** Tuesday, November 02, 2010 8:56 AM  
**To:** robert.poche@constellation.com; cc3project@constellation.com; Scott, Roger D  
**Cc:** CCNPP3eRAIPEm Resource; Jeng, David; Hawkins, Kimberly; Colaccino, Joseph; Miernicki, Michael; Vrahoretis, Susan; Kirkwood, Sara  
**Subject:** Final RAI 269 SEB2 5137  
**Attachments:** Final RAI 269 SEB2 5137.doc

Rob,

Attached please find the subject request for additional information (RAI). The draft of this RAI was sent to you on October 21, 2010. In a phone call on November 1, 2010, you informed us that UniStar does not need a clarification phone call for this RAI and the RAI can be issued final.

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.

Thank you,

James Steckel  
Project Manager  
NRC EPR Projects Branch  
301 415-1026  
[james.steckel@nrc.gov](mailto:james.steckel@nrc.gov)

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**Received Date:** 11/2/2010 8:55:58 AM  
**From:** Steckel, James

**Created By:** James.Steckel@nrc.gov

**Recipients:**

"CCNPP3eRAIPEm Resource" <CCNPP3eRAIPEm.Resource@nrc.gov>

Tracking Status: None

"Jeng, David" <David.Jeng@nrc.gov>

Tracking Status: None

"Hawkins, Kimberly" <Kimberly.Hawkins@nrc.gov>

Tracking Status: None

"Colaccino, Joseph" <Joseph.Colaccino@nrc.gov>

Tracking Status: None

"Miernicki, Michael" <Michael.Miernicki@nrc.gov>

Tracking Status: None

"Vrahoretis, Susan" <Susan.Vrahoretis@nrc.gov>

Tracking Status: None

"Kirkwood, Sara" <Sara.Kirkwood@nrc.gov>

Tracking Status: None

"robert.poche@constellation.com" <robert.poche@constellation.com>

Tracking Status: None

"cc3project@constellation.com" <cc3project@constellation.com>

Tracking Status: None

"Scott, Roger D" <roger.scott@unistarnuclear.com>

Tracking Status: None

**Post Office:** HQCLSTR02.nrc.gov

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**Recipients Received:**

Request for Additional Information No. 269 (eRAI 5137)

11/2/2010

Calvert Cliffs Unit 3  
UniStar

Docket No. 52-016

SRP Section: 14.03.02 - Structural and Systems Engineering - Inspections, Tests, Analyses, and  
Acceptance Criteria

Application Section: FSAR 14.3.2

QUESTIONS for Structural Engineering Branch 2 (ESBWR/ABWR Projects) (SEB2)

14.03.02-9

The staff reviewed the response to Question 14.03.02-3 provided in UniStar Letter UN#10-169 dated June 30, 2010 (ML101880073) and found that the response to Items 2 and 3 is acceptable, however, the following information is needed to address Item 1 of the RAI and the contents in the revised ITAAC Table 2.4-26:

Item 1 of the RAI is related to the need for ITAAC to require an analysis for reconciling the as-built plant with all the structural design-basis loads and acceptance criteria, and a report documenting the analysis results. The response indicated that the contents of Item 2b and Item 3b in the second column of Table 2.4-26 had been revised and Items 2d and 3d had been added to state that inspections will be performed to verify that deviations will be reconciled to the seismic qualification reports (SQPD, EQPD or analyses). The response also explained that the reconciliation of the as-built condition is addressed in Items 2b and 3b, rather than Item 2a and Item 3a because the as-built conditions are addressed in inspection ITAAC rather than analysis ITAAC. The staff's review of the response and the revised table found that neither the response nor the revised table clearly indicate whether an analysis for reconciling the as-built plant with the structural design-basis loads would be performed. Therefore, the staff requests that the applicant clarify whether an analysis for reconciling the as-built plant with structural design-basis loads will be performed. If not, explain why not. If yes, revise the response and Table 2.4-26 to clearly state that the analysis will be performed. If the analysis is performed only under certain conditions, provide the criteria for determining when the analysis has to be performed. Such criteria should be indicated in the revised ITAAC Table. The staff needs the above noted clarification to ensure that adequate ITAAC is proposed and there is reasonable assurance that adequate ITAAC, including reconciliation of as-built plant with the structural design-basis loads and acceptance criteria by analysis, as appropriate, will be implemented pursuant to 10 CFR 52.80(a).

Regarding the revised Table 2.4-26, the discussion referencing the Seismic Categories in all the columns of Item 2 in the table should be checked for consistency. For example, Seismic Category I is referenced in the first column of Item 2b, while Seismic Category II-SSE is referenced in all three columns of Items 2a and 2e as well as in the other two columns of Item 2b. Furthermore, all columns of Items 2c and 2d state that "... identified as Seismic Category I in the part (e) analysis", while Item 2e, which discusses part (e) analysis, only refers to Seismic Category II-SSE.

14.03.02-10

The staff reviewed the response to Question 14.03.02-4 provided in UniStar Letter UN#10-169 dated June 30, 2010 (ML101880073) and found that the response to Item 2 of the RAI is acceptable, however, the following additional information is needed regarding Item 1 of the RAI:

Item 1 of the RAI is related to the need for ITAAC to require an analysis for reconciling the as-built plant with all the structural design-basis loads and acceptance criteria, and a report documenting the analysis results. The response indicated that the contents of Item 2b in the second column of Table 2.4-10 had been revised to state that an inspection will be performed to verify the Fire Protection Building is constructed as specified on the construction drawings and deviations will be reconciled to the seismic qualification reports (SQPD, EQPD or analyses). The response also explained that the reconciliation of the as-built condition is addressed in Item 2b, rather than Item 2a because as-built conditions are addressed in inspection ITAAC rather than analysis ITAAC. The staff's review of the response and the revised table found that neither the response nor the revised table clearly indicate whether an analysis for reconciling the as-built plant with the structural design-basis loads would be performed or not.

Therefore, the staff requests that the applicant clarify whether an analysis for reconciling the as-built plant with structural design-basis loads will be performed. If not, explain why not. If yes, revise the response and Table 2.4-10 to clearly state that the analysis will be performed. If the analysis is performed only under certain conditions, provide the criteria for determining when the analysis has to be performed. Such criteria should be indicated in the revised ITAAC Table. The staff needs the above noted clarification to ensure that adequate ITAAC is proposed and there is reasonable assurance that adequate ITAAC, including reconciliation of as-built plant with the structural design-basis loads and acceptance criteria by analysis, as appropriate, will be implemented pursuant to 10 CFR 52.80(a).