

## 4.0 REACTOR

This chapter of the application describes the reactor assembly, which consists of the reactor pressure vessel (RPV), pressure containing appurtenances that include control rod drive (CRD) housings, in-core instrumentation housing, and the head vent and spray assembly. The RPV includes the reactor internal pump (RIP) casing and flow restrictors in each of the steam outlet nozzles and the shroud support and pump deck that form the partition between the RIP suction and discharge.

### 4.1 Summary Description

The major reactor internal components are the core (fuel, channels, control blades, CRDs and instrumentation); the core support structure (including the shroud, top guide, and core plate); the shroud head and steam separator assembly; the steam dryer assembly; the feedwater spargers; RIPs; and the core flooding spargers. Except for the Zircaloy in the reactor core, these reactor internals are stainless steel or other corrosion-resistant alloys. The fuel assemblies (including fuel rods and channel), control blades, shroud head and steam separator assembly, and steam dryers and in-core instrumentation dry tubes are removable when the reactor vessel is opened for refueling or maintenance.

Section 4.1 of the South Texas Project (STP) combined license (COL) Final Safety Analysis Report (FSAR) incorporates by reference, with no departures or supplements, Section 4.1, "Summary Description," of Revision 4 of the certified Advanced Boiling-Water Reactor (ABWR) Design Control Document (DCD), Revision 4, which is, itself incorporated by referenced into Title 10 of the *Code of Federal Regulations* (10 CFR) Part 52, Appendix A. U.S. Nuclear Regulatory Commission (NRC) staff reviewed the application and checked the referenced DCD to ensure that no issue relating to this section remained for review<sup>1</sup>. The staff's review confirmed that there is no outstanding issue related to this subsection. Pursuant to 10 CFR 52.63(a)(5) and Part 52, Appendix A, Section VI.B.1, all nuclear safety issues relating to the design goals and bases have been resolved.

### 4.2 Fuel System Design

#### 4.2.1 Introduction

This section of the application addresses the thermal, mechanical, and materials design of the fuel system. The fuel system consists of arrays (assemblies or bundles) of fuel rods including fuel pellets, insulator pellets, springs, tubular cladding, end closures, hydrogen getters, and fill gas; burnable poison rods that include components similar to those in fuel rods; spacer grids and springs; end plates; channel boxes; and reactivity control rods. This section discusses the fuel system design and reactivity control elements of the control rods that extend from the coupling interface of the CRD mechanism into the core.

#### 4.2.2 Summary of Application

Section 4.2 and Appendices 4B and 4D of the STP Units 3 and 4 COL FSAR incorporates by reference Section 4.2 of the certified ABWR DCD Revision 4 referenced in 10 CFR Part 52,

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<sup>1</sup> See "Finality of Referenced NRC Approvals" in SER Section 1.1.3 for a discussion on the staff's review related to verification of the scope of information to be included in a COL application that references a design certification.

Appendix A with no departures. Appendix 4C of the STP Units 3 and 4 COL FSAR incorporates by reference Section 4.2 of the certified ABWR DCD Revision 4 referenced in 10 CFR Part 52, Appendix A with only one administrative departure.

### Tier 2 Departures Not Requiring Prior NRC Approval

- STD DEP Admin

In FSAR Subsection 4C.3.4 the administrative departure changes the following text in Section 4C.3.4 of the ABWR DCD from:

Scram time insertion performance and control rod drop times affect the total reactivity inserted into the core.

to the following text in Section 4C.3.4 in the STP Units 3 and 4 COL:

Scram time insertion performance affects the total reactivity inserted into the core..

#### **4.2.3 Regulatory Basis**

The regulatory basis for the information incorporated by reference is in NUREG–1503, “Final Safety Evaluation Report Related to the Certification of the Advanced Boiling-Water Reactor Design,” (July 1994) (FSER related to the ABWR DCD).

#### **4.2.4 Technical Evaluation**

As documented in NUREG–1503, NRC staff reviewed and approved Section 4.2 of the certified ABWR DCD. NRC staff reviewed Section 4.2 of the STP Units 3 and 4 COL FSAR. The staff also checked the referenced ABWR DCD to ensure that the combination of information in the COL FSAR and information in the ABWR DCD represents the complete scope of information relating to this review topic.<sup>1</sup> The staff’s review confirmed that the information in the application and the information incorporated by reference address the required information relating to fuel system design.

The staff reviewed the information in the COL FSAR:

#### Appendix 4B Fuel Licensing Acceptance Criteria

Appendix 4B of the ABWR DCD contains the fuel licensing acceptance criteria for evaluating fuel designs and for determining the applicability of generic analyses to these designs. This is supplementary information supporting the Fuel System Design discussed in ABWR DCD Section 4.2. The staff reviewed and approved Appendix 4B as documented in NUREG-1503.

The COL applicant incorporates by reference Appendix 4B of the certified ABWR DCD referenced in Appendix A to 10 CFR Part 52. No departures from the certified design are identified. The applicant has submitted the applicable proprietary information as required by Section IV.A.3 of the ABWR Design Certification Rule.

Any change to the criteria in Appendix 4B requires prior NRC review and approval.

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<sup>1</sup> See “Finality of Referenced NRC Approvals” in SER Section 1.1.3 for a discussion on the staff’s review related to verification of the scope of information to be included in a COL application that references a design certification.

#### Appendix 4C Control Rod Licensing Acceptance Criteria

Appendix 4C of the ABWR DCD contains the control rod licensing acceptance criteria for evaluating new control rod designs. This is supplementary information supporting the Fuel System Design discussed in ABWR DCD Section 4.2. The staff reviewed and approved Appendix 4C as documented in NUREG-1503.

The applicant incorporates by reference Appendix 4C of the certified ABWR DCD referenced in Appendix A to 10 CFR Part 52 with one administrative departure:

#### Tier 2 Departures Not Requiring Prior NRC Approval

- STD DEP Admin

In FSAR Subsection 4C.3.4 the administrative departure changes the following text in Section 4C.3.4 of the ABWR DCD from:

Scram time insertion performance and control rod drop times affect the total reactivity inserted into the core.

to the following text in Section 4C.3.4 in the STP Units 3 and 4 COL:

Scram time insertion performance affects the total reactivity inserted into the core.

This administrative departure changes the text in Section 4C.3.4, "Reactivity," of the ABWR DCD to agree with the terminology used in the technical specifications. Therefore, this departure is acceptable.

Any change to the criteria in Appendix 4C requires prior NRC review and approval.

#### Appendix 4D Reference Fuel Design Compliance with Acceptance Criteria

Appendix 4D of the ABWR DCD contains the fuel design compliance with the fuel licensing acceptance criteria (from Appendix 4B). This supplementary information supports the Fuel System Design discussed in ABWR DCD Section 4.2. The staff reviewed and approved Appendix 4D as documented in NUREG-1503.

The applicant incorporates by reference Appendix 4D of the certified ABWR DCD referenced in Appendix A to 10 CFR Part 52. No departures from the certified design are identified. The applicant has submitted the applicable proprietary information as required by Section IV.A.3 of the ABWR Design Certification Rule.

Any change to the criteria in Appendix 4D requires prior NRC review and approval.

#### **4.2.5 Post Combined License Activities**

There are no post COL activities related to this section.

#### **4.2.6 Conclusion**

The NRC staff reviewed the application and checked the referenced DCD. The NRC staff's finding related to information incorporated by reference is in NUREG–1503. The staff concludes that the Fuel System Design is in accordance with the requirements of 10 CFR 52.63(a)(5) and Part 52, Appendix A, Section VI.B.1. In addition, the applicant identified STD DEP Admin in Appendix C. The staff finds it reasonable that this departure is adequately characterized as not needing prior NRC approval. In conclusion, the applicant has provided sufficient information for satisfying 10 CFR Part 52, Appendix A, Section VIII.B.5.

### **4.3 Nuclear Design**

#### **4.3.1 Introduction**

This section of the application addresses whether the nuclear design of the fuel assemblies, control systems, and reactor core is carried out to aid in confirming that fuel design limits will not be exceeded during normal operation or anticipated operational occurrences, including stability, and that postulated reactivity events will not (1) violate specified acceptable fuel design limits; (2) cause significant damage to the reactor coolant pressure boundary; or (3) impair the capability to cool the core.

#### **4.3.2 Summary of Application**

Section 4.3 and Appendix 4A of the STP Units 3 and 4 COL FSAR incorporates by reference Section 4.3 of the certified ABWR DCD Revision 4, with no departures. In addition, in COL FSAR Section 4.3, the applicant provides the following:

##### COL License Information Item

- COL License Information Item 4.1 Thermal Hydraulic Stability

This COL license information item addresses the use of an approved stability compliance methodology if the fuel design is changed. The applicant states that the DCD fuel design remains unchanged.

#### **4.3.3 Regulatory Basis**

The regulatory basis for the information incorporated by reference is in NUREG–1503.

The regulatory basis for reviewing the COL license information item is in Section 4.3 of NUREG–0800.

#### **4.3.4 Technical Evaluation**

As documented in NUREG–1503, NRC staff reviewed and approved Section 4.3 of the certified ABWR DCD. NRC staff reviewed Section 4.3 of the STP Units 3 and 4 COL FSAR. The staff also checked the referenced ABWR DCD to ensure that the combination of information in the COL FSAR and information in the ABWR DCD represents the complete scope of information relating to this review topic.<sup>1</sup> The staff's review confirmed that the information in the application

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<sup>1</sup> See "Finality of Referenced NRC Approvals" in SER Section 1.1.3 for a discussion on the staff's review related to verification of the scope of information to be included in a COL application that references a design certification.

and the information incorporated by reference address the required information relating to nuclear design.

The staff reviewed the information in the COL FSAR:

COL License Information Item

- COL License Information Item 4.1 Thermal Hydraulic Stability

NRC staff's current review of this application includes COL License Information Item 4.1. Specific information provided by the applicant to address COL License Information Item 4.1 includes a statement in the DCD indicating that if a different fuel design is chosen by the COL applicant, the methodology used to demonstrate compliance with acceptable thermal hydraulic stability criteria will be one that has been approved by the NRC. This methodology is discussed in DCD Subsection 4.3.2.6.2

In response to COL License Information Item 4.1, the applicant states that the fuel design has not changed. Thus this COL License Information Item is resolved.

The staff has issued RAI 04.03-2 requesting that the applicant explain the inconsistencies in the typical loading patterns for Figure 4.3-2 within their application and the generic ABWR DCD. The applicant, in letter U7-C-STP-NRC-100153, dated June 28, 2010, submitted the correct Figure 4.3-2 and the figure was incorporated into Rev. 4 of the COLA; therefore RAI 04.03-2 is resolved.

Appendix 4A Typical Control Rod Patterns and Associated Power Distribution for ABWR

Appendix 4A of the ABWR DCD contains a typical simulation of an equilibrium cycle core. This appendix is supplementary information supporting the nuclear design discussed in ABWR DCD Section 4.3.

The COL applicant incorporates by reference Appendix 4A of the certified ABWR DCD referenced in Appendix A to 10 CFR Part 52. No departures from the certified design are identified.

The staff issued RAI 04.03-1 requesting that the applicant provide an explanation for the inconsistencies between the STP 3/4 COL application and the generic ABWR DCD within Appendix 4A for the maximum linear heat generation rate (MLHGR) values and the Integrated Power per Bundle values. The COL applicant responded in letter U7-C-STP-NRC-090063 dated June 25, 2009. The staff did not agree with the applicant that "there have been no changes to the figures from what was previously approved and is not subject to re-review." The staff requested the applicant to submit the correct figures. The applicant in letter U7-C-STP-NRC-100153 dated June 28, 2010 submitted the correct Figures 4A-1a and 4A-1d and the figures were incorporated into Rev. 4 of the COLA; therefore RAI 04.03-1 is resolved.

**4.3.5 Post Combined License Activities**

There are no post COL activities related to this section.

#### **4.3.6 Conclusion**

The NRC staff reviewed the application and checked the referenced DCD. The NRC staff's finding related to information incorporated by reference is in NUREG-1503. The staff concludes that the Nuclear Design is in accordance with the requirements of 10 CFR 52.63(a)(5) and Part 52, Appendix A, Section VI.B.1. In conclusion, the applicant has provided sufficient information for satisfying 10 CFR Part 52, Appendix A, Section VIII.B.5.

#### **4.4 Thermal Hydraulic Design**

##### **4.4.1 Introduction**

This section of the application addresses the thermal and hydraulic design of the core and the reactor coolant system (RCS). The contents of this section verify that the core thermal-hydraulic designs (1) use acceptable analytical methods, (2) are equivalent to or are a justified extrapolation from proven designs, (3) provide acceptable margins of safety from conditions that would lead to fuel damage during normal reactor operation and anticipated operational occurrences, and (4) are not susceptible to thermal-hydraulic instability.

##### **4.4.2 Summary of Application**

Section 4.4 of the STP Units 3 and 4 COL FSAR incorporates by reference Section 4.4 of the certified ABWR DCD Revision 4. In addition, in COL FSAR Section 4.4, the applicant provides the following:

##### *Tier 2 Departures Not Requiring Prior NRC Approval*

- STD DEP 6C-1 Testing and Verification

This departure identifies an analysis that will be performed to determine the required cooling for a fuel assembly post-LOCA.

- STD DEP Admin

In FSAR Subsection 4.4.3.1.3, "Reactor Coolant System Geometric Data," a reference to "recirculation loops of the Reactor Coolant System" was deleted.

In FSAR Subsection 4.4.3.5.2, "MCPR Operating Limit Calculational," "v CPR" was changed to " $\Delta$  CPR."

##### **4.4.3 Regulatory Basis**

The regulatory basis for the information incorporated by reference is in NUREG-1503.

The regulatory basis for reviewing the COL license information item is in Section 4.4 of NUREG-0800.

##### **4.4.4 Technical Evaluation**

As documented in NUREG-1503, NRC staff reviewed and approved Section 4.4 of the certified ABWR DCD.

The staff reviewed Section 4.4 of the STP Units 3 and 4 COL FSAR and checked the referenced ABWR DCD to ensure that the combination of the information in the COL FSAR and the information in the ABWR DCD appropriately represents the complete scope of information relating to this review topic.<sup>1</sup> The staff's review confirmed that the information in the application and the information incorporated by reference address the required information relating to thermal hydraulic design.

The staff reviewed the information in the COL FSAR:

*Tier 2 Departures Not Requiring Prior NRC Approval*

- STD DEP 6C-1 Testing and Verification

FSAR Section 4.4.6 addresses the testing and verification techniques that will be used to assure that the planned thermal and hydraulic design characteristics of the core have been provided and will remain within required limits throughout core lifetime. The detailed discussion is presented in FSAR Chapter 14, and the staff evaluation is provided in Chapter 14 of the staff Safety Evaluation Report.

FSAR Section 4.4.6 also identifies an analysis which is performed to determine the required cooling for a fuel assembly post-LOCA, and which is used to develop acceptance criteria for a downstream fuel effects test which will be performed prior to the initial cycle operation to assess fuel and ECCS performance considering the effects of LOCA-generated debris. The detailed description is provided in FSAR Appendix 6C. The staff evaluation is provided in Chapter 6 of the staff Safety Evaluation Report.

Although the applicant has identified the Tier 2 departure, STD DEP 6C-1, as not requiring prior NRC approval, the staff found it necessary to evaluate it within the scope of conformance with RG 1.82, Revision 3, because the applicant has committed to conform to this guidance which is applicable to Downstream Effects. Downstream Effects of LOCA-generated debris is a safety-related issue that was identified after the ABWR DCD was certified. Therefore, in RAI 06.02.02-2, the staff requested that the applicant describe how they will address the downstream effects identified in RG 1.82, Rev.3. In response to RAI 06.02.02-2, STP Nuclear Operating Company (STPNOC), in their letter dated September 28, 2009 (U7-C-STP-NRC-090141), agreed to a COL license condition to submit an evaluation as part of the license amendment confirming that the fuel for the initial fuel load satisfies the downstream effects of containment debris on the reactor fuel. The acceptance criteria specified in the response was not sufficient. The staff issued RAI 04.04-3 requesting that the COL applicant provide verifiable criteria for the fuel testing, revise FSAR Section 4.4 to include the details of the acceptance criteria, and confirm that the protective coatings debris characteristics for fuel assembly tests will be consistent with the NRC guidance for operating pressurized water reactors (PWRs). The applicant submitted the response to RAI 04.04-03 in letter U7-C-STP-NRC-1000144, dated February 22, 2010. As a follow-up to the review, the staff audited the calculation performed by Westinghouse to determine the acceptance criteria. The staff issued RAI 04.04-4 requesting additional information regarding the calculation performed. The staff's evaluation of this issue is included and found acceptable in Section 6.2.1.4 of this Safety Evaluation Report.

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<sup>1</sup> See "Finality of Referenced NRC Approvals" in SER Section 1.1.3 for a discussion on the staff's review related to verification of the scope of information to be included in a COL application that references a design certification.

- STD DEP Admin

The NRC staff's review found the applicant's editorial and administrative changes acceptable. However, the staff identified an inconsistency between the DCD and the FSAR and issued RAI 04.04-1.

The COL applicant responded to the RAI in a letter (U7-C-STP-NRC-090063) dated June 25, 2009. The applicant agreed in the response that there is a typographical error and FSAR Subsection 4.4.3.5.2 will be changed to Subsection 4.4.5.5.2 to be consistent with the DCD. This change was incorporated into the next revision of the COL FSAR and tracked as **Confirmatory Item 04.04-1**. In revision 4 of the FSAR, the staff confirmed that the typographical error identified in RAI 04.04-1 was correct and as such **Confirmatory Item 04.04-1** is resolved.

#### **4.4.5 Post Combined License Activities**

COM 4.4-3, states that STPNOC will provide an updated Stability Option III analysis once fuel is procured and the associated safety analysis is performed. This activity will be completed no later than one year prior to fuel load.

#### **4.4.6 Conclusion**

The NRC staff reviewed the application and checked the referenced DCD. The NRC staff's finding related to information incorporated by reference is in NUREG-1503. The staff concludes that the Thermal Hydraulic Design is in accordance with the requirements of 10 CFR 52.63(a)(5) and Part 52, Appendix A, Section VI.B.1. In addition, the applicant identified STD DEP Admin in Section 4.4.3.5.2 and STD DEP C-1 in Section 4.4.6. The staff finds it reasonable that these departures are adequately characterized as not needing prior NRC approval. In conclusion, the applicant has provided sufficient information for satisfying 10 CFR Part 52, Appendix A, Section VIII.B.5.

### **4.5 Reactor Materials**

#### **4.5.1 Control Rod Drive Structural Materials**

##### **4.5.1.1 Introduction**

This FSAR section addresses information related to the materials selection, processing, fabrication, and cleaning and cleanliness controls applied to CRD structural components. Materials selected for CRD structural components must provide adequate performance throughout the design life of the plant (or the component).

##### **4.5.1.2 Summary of Application**

Section 4.5.1 of the STP Units 3 and 4 COL FSAR incorporates by reference Section 4.5.1 of the certified ABWR DCD, Revision 4, referenced in 10 CFR Part 52, Appendix A. In addition, in FSAR Section 4.5.1, the applicant provides the following:

### Tier 2 Departure Not Requiring Prior NRC Approval

- STD DEP 4.5.1 Reactor Materials

This departure addresses the additional materials specifications and grades for some components and updates descriptions of operational experience. The applicant also modifies the CRD materials list to allow for the use of alternative materials specifications (for non-reactor coolant pressure boundary components) from those listed in COL FSAR Subsection 4.5.1.1, as long as the materials are equivalent. The applicant considers materials with similar chemical composition, mechanical properties, and operating experience to be equivalent.

### COL License Information Item

- COL License Information Item 4.4 CRD Inspection Program

The applicant provides supplemental information in COL FSAR Subsection 4.5.3.1 describing the CRD inspection program, which addresses the inspection needs identified in ABWR DCD Subsection 4.5.3.1.

#### **4.5.1.3 Regulatory Basis**

The regulatory basis of the information incorporated by reference is in NUREG–1503. In addition, the relevant requirements of NRC regulations and the associated acceptance criteria for CRD structural materials and inspection programs are listed in Section 4.5.1 of NUREG-0800 (SRP). The regulatory basis of COL Information Item 4.4 is 10 CFR 50.55a and GDC 26.

In accordance with Section VIII, “Processes for Changes and Departures,” of “Appendix A to Part 52-Design Certification Rule for the U.S. Advanced Boiling-Water Reactor,” the applicant identifies a Tier 2 departure. This departure is subject to the requirements of Section VIII.B.5, which are similar to the requirements in 10 CFR 50.59.

#### **4.5.1.4 Technical Evaluation**

As documented in NUREG–1503, the staff reviewed and approved Section 4.5.1 of the certified ABWR DCD. NRC staff reviewed Section 4.5.1 of the STP Units 3 and 4 COL FSAR. The staff also checked the referenced ABWR DCD to ensure that the combination of information in the COL FSAR and information in the ABWR DCD represents the complete scope of information relating to this review topic.<sup>1</sup> The staff’s review confirmed that the information in the application and the information incorporated by reference address the required information relating to control rod drive structural materials.

The staff reviewed the information in the COL FSAR:

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<sup>1</sup> See “Finality of Referenced NRC Approvals” in SER Section 1.1.3 for a discussion on the staff’s review related to verification of the scope of information to be included in a COL application that references a design certification.

### COL License Information Item

- COL License Information Item 4.4      CRD Inspection Program

The applicant provides additional information in COL FSAR Subsection 4.5.3.1 addressing COL License Information Item 4.4. The applicant states the following:

The CRD condition and integrity are monitored by a routine visual inspection of a selected sample of CRDs during each outage period. The number and selection process for the CRDs is based on vendor recommendations and included in the preventive maintenance program. CRD performance is monitored under the provisions of the Maintenance Rule, and this monitoring coupled with the CRD inspections detects incipient defects before they become serious enough to cause operating problems. The CRD nozzle and bolting are included in the inservice inspection program. CRD bolting is accessible for inservice examinations during normally scheduled CRD maintenance.

ABWR DCD Subsection 4.5.3.1 states the following:

The CRD inspection program shall include provisions to detect incipient defects before they become serious enough to cause operating problems. The CRD nozzle and bolting are included in the in-service inspection program (Table 5.2-8, System Number B11/B12). CRD bolting is accessible for inservice examinations during normally scheduled CRD maintenance.

NRC staff found that the supplemental information provided by the applicant, as stated above, appropriately addresses ABWR DCD COL Information Item 4.4. The inclusion of the CRD nozzle and bolting in the in-service inspection program satisfies the requirements of 10 CFR 50.55a. Additional information related to the applicant's in-service inspection program is located in FSER Section 5.2.4. The applicant's CRD inspection program will contain provisions to ensure that incipient defects will be detected before they become an operational concern thus meeting the requirements of GDC 26.

#### **4.5.1.5    *Post Combined License Activities***

There are no post COL activities related to this section.

#### **4.5.1.6    *Conclusion***

The NRC staff's finding related to information incorporated by reference is in NUREG-1503. The staff's review confirmed that there is no outstanding issue related to this section. Pursuant to 10 CFR 52.63(a)(5) and Part 52, Appendix A, Section VI.B.1, all nuclear safety issues relating to the CRD structural materials that were incorporated by reference have been resolved. In addition, the applicant identified STD DEP 4.5.1 in COL Section 4.5.1.1. The staff finds it reasonable that this departure is adequately characterized as not needing prior NRC approval. In conclusion, the applicant has provided sufficient information for satisfying 10 CFR Part 52, Appendix A, Section VIII.B.5.

The staff reviewed COL Information Item 4.4 and finds that it meets the applicable requirements of 10 CFR 50.55a and general design criteria (GDC) 26.

## **4.5.2 Reactor Internal Materials**

### **4.5.2.1 Introduction**

ABWR design certification document (DCD) Section 4.5.2 addresses information related to materials selection and component design, fabrication, and inspection to ensure the structural integrity of internal and core support structures during reactor operation. Materials selected for reactor internals and structural components must perform adequately throughout the design life of the plant (or component).

### **4.5.2.2 Summary of Application**

Section 4.5.2 of the STP Units 3 and 4 COL FSAR incorporates by reference Section 4.5.2 of the ABWR DCD, Revision 4, referenced in 10 CFR Part 52, Appendix A .

In addition, the applicant provided the following:

#### *Tier 2 Departure Not Requiring Prior NRC Approval*

- STD DEP 4.5-1 Reactor Materials

The applicant provided STD SEP 4.5-1 to revise text and provide additional information to ABWR DCD Section 4.5.2.1, “Materials Specifications”; Section 4.5.2.2, “Controls on Welding”; Section 4.5.2.3, “Non-Destructive Examination of Wrought Seamless Tubular”; Section 4.5.2.4, “Fabrication and Processing of Austenitic Stainless Steel – Regulatory Guide Conformance”; and Section 4.5.2.5, “Other Materials.”

STP Units 3 and 4 COL FSAR Section 4.5.2 does not contain any COL information items related to ABWR DCD Section 4.5.2.

### **4.5.2.3 Regulatory Basis**

The regulatory basis of the information incorporated by reference is in NUREG–1503

In accordance with Section VIII, “Processes for Changes and Departures,” of “Appendix A to Part 52-Design Certification Rule for the U.S. Advanced Boiling Water Reactor,” the applicant identifies a Tier 2 departure. This departure is subject to the requirements of Section VIII.B.5, which are similar to the requirements in 10 CFR 50.59.

### **4.5.2.4 Technical Evaluation**

As documented in NUREG–1503, the staff reviewed and approved Section 4.5.2 of the certified ABWR DCD. NRC staff reviewed Section 4.5.2 of the STP Units 3 and 4 COL FSAR. The staff also checked the referenced ABWR DCD to ensure that the combination of information in the COL FSAR and information in the ABWR DCD represents the complete scope of information relating to this review topic.<sup>1</sup> The staff’s review confirmed that the information in the application and the information incorporated by reference address the required information relating to reactor internal material.

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<sup>1</sup> See “Finality of Referenced NRC Approvals” in SER Section 1.1.3 for a discussion on the staff’s review related to verification of the scope of information to be included in a COL application that references a design certification.



This COL license information item provides information regarding CRD and FMCDR installation and verification.

#### **4.6.3 Regulatory Basis**

The regulatory basis for the review of the information incorporated by reference is in NUREG-1503.

In accordance with Section VIII, "Processes for Changes and Departures," of 10 CFR Part 52, Appendix A, the applicant identifies Tier 2 departures. Tier 2 departures not requiring prior NRC approval are subject to the requirements of 10 CFR Part 52, Appendix A, Section VIII.B.5, which are similar to the requirements in 10 CFR 50.59.

The regulatory basis for the review of the COL license information items is in Section 4.6 of NUREG-0800.

#### **4.6.4 Technical Evaluation**

As documented in NUREG-1503, the staff reviewed and approved Section 4.6 of the certified ABWR DCD. NRC staff reviewed Section 4.6 of the STP Units 3 and 4 COL FSAR. The staff also checked the referenced ABWR DCD to ensure that the combination of information in the COL FSAR and information in the ABWR DCD represents the complete scope of information relating to this review topic.<sup>1</sup> The staff's review confirmed that the information in the application and the information incorporated by reference address the required information relating to functional design of control rod drive system.

The staff reviewed the information in the COL FSAR:

##### COL License Information Item

- COL License Information Item 4.5      CRD and FMCDR Installation and Verification During Maintenance

This COL License Information Item requests that the applicant develop procedures to ensure that maintenance procedures have provisions to prohibit coincident removal of the CRD blade and drive of the same assembly. In addition, the COL applicant shall develop contingency procedures to provide core and spent fuel cooling capability and mitigative actions during CRD replacement with fuel in the vessel.

Specific information provided by the applicant to address COL License Information Item 4.5 should include programs and procedures to address issues that could arise during maintenance. The applicant should provide the time frame when the administrative procedures will be available before fuel load. These procedures ensure that maintenance procedures have provisions to prohibit a coincident removal of the CRD blade and drive of the same assembly. In addition, the applicant should provide the time frame when the contingency procedures will be available for the staff to review. These procedures provide the core- and spent-fuel cooling capability and mitigating actions during CRD replacement with fuel in the vessel.

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<sup>1</sup> See "Finality of Referenced NRC Approvals" in SER Section 1.1.3 for a discussion on the staff's review related to verification of the scope of information to be included in a COL application that references a design certification.

NRC staff issued RAI 04.06-1 to address (1) the time frame for the availability of COL License Information Item 4.5 for the staff to review, and (2) the revision of Subsection 13.5.3.4.2 to assure that the specific procedures will be developed as required by COL License Information Item 4.5.

The applicant responded to RAI 04.06-1 in a letter (U7-C-STP-NRC-090049) dated May 26, 2009, which includes the following statement:

The incorporation of the COL License Information Item 4.5 into plant maintenance procedures is adequately addressed by the STP 3&4 Quality Assurance Program Description (QAPD) and FSAR Subsection 13.5.3.4.2 item (8) combined with FSAR Table 1.9-1.

However, to provide additional assurance that the subject of the RAI is incorporated, the applicant revised the first paragraph of COL application Section 13.5 to include the following:

The procedures that are identified in or required by the COL License Information Items in ABWR DCD, Tier 2, Table 1.9-1, will be incorporated into the plant procedures according to the following supplements, as applicable.

The staff confirmed that the FSAR revision is acceptable and RAI 04.06-1 is therefore resolved.

In Subsection 4.6.1.2.3, "Hydraulic Control Units," Standard Departure 4.6-1 deletes the phrase "a small pump and associated" to read, "The test fixture contains hydraulic controls to pressurize the underside of the hollow piston."

The staff noted that the revised description was editorially incorrect, but the intent was understandable. The staff issued RAI 04.06-2 requesting the applicant to clarify the intended description of the special test fixture and to revise the FSAR narrative accordingly. In the response to RAI 04.06-2, (letter U7-C-STP-NRC-090060, dated June 22, 2009), the applicant provides an explanation for Standard Departure 4.6-1 without clarifying the narrative. However, because there is no impact on the design that would affect plant operation, and the intent of the statement is understandable, the staff accepted the response and concluded that RAI 04.06-2 is resolved.

In Subsection 4.6.1.2.4.1, the applicant states that "Approximately 4 L/min purge flow is provided to the NBS reference leg instrument lines." From the description and the data in the FSAR, the staff was unable to confirm the validity of the 4 L/min purge flow. Therefore, the staff issued RAI 04.06-3 requesting the applicant to provide the basis (e.g., assumptions, boundary conditions, references) for this value.

In response to RAI 04.06-3, (letter U7-C-STP-NRC-090060 dated June 22, 2009), the applicant includes a discussion and references a report (GENE-637-019-0893, "Analysis Guidelines for Backfill Modification of RPV Water Level Instrumentation," Revision 0) that provides the method used in the purge flow calculation. The applicant also notes that the flow rate in the referenced report is incorrectly transcribed into the COL FSAR, Subsection 4.6.1.2.4.1(4). The value stated in the referenced report is 4 lb/hour (0.03 L/min). As follow-up, the staff issued RAI 04.06-4 requesting the applicant to provide the referenced report to complete the evaluation. The applicant submitted the reference report in letter U7-C-STP-NRC-100019, dated January 23, 2010. The staff verified that the purge flow of 0.03 L/Min is correct; therefore RAI 04.06-3 and 04.06-4 are resolved

#### **4.6.5 Post Combined License Activities**

There are no post COL activities related to this section.

#### **4.6.6 Conclusion**

The NRC staff reviewed the application and checked the referenced DCD. The NRC staff's finding related to information incorporated by reference is in NUREG-1503. The staff concludes that the Functional Design of Control Rod Drive System is in accordance with the requirements of 10 CFR 52.63(a)(5) and Part 52, Appendix A, Section VI.B.1. In addition, the applicant identified STD DEP 4.6-1 and STD 7.7-1 in COL Section 4.6. The staff finds it reasonable that this departure is adequately characterized as not needing prior NRC approval. In conclusion, the applicant has provided sufficient information for satisfying 10 CFR Part 52, Appendix A, Section VIII.B.5.