

PMNorthAnna3COLPEmails Resource

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Sent: Tuesday, February 08, 2011 1:10 PM
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Subject: Draft RAI 5279 (Sec. 14.3.12), 5445 (Sec. 13.6), and 5460 (Sec. 3.2.2) for North Anna 3 COLA
Attachments: DRAFT RAI 5279.doc; DRAFT RAI 5460.doc; Draft RAI 5445.doc

Please see attached Draft RAI 5279, 5445, and 5460 for Sections 14.3.12, 13.6, and 3.2.2. Please let me know if you need any clarification by COB February 11, 2011. Otherwise, it will be issued as final after February 11, 2011.

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DRAFT RAI 5279.doc	37370	
DRAFT RAI 5460.doc	30714	
Draft RAI 5445.doc	30202	

Options

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Request for Additional Information No. 5279

North Anna, Unit 3

Dominion

Docket No. 52-017

SRP Section: 14.03.12 - Physical Security Hardware - Inspections, Tests, Analyses, and Acceptance Criteria

Application Section: NUREG-0800

QUESTIONS for Reactor Security Rulemaking and Licensing Branch (NSIR/DSP/RSRLB)

14.03.12-***

ITAAC # 1

North Anna 3, S-COL application revision 3, Part 10, Dated June 10, 2010 Combine License Application (including Inspection, Testing, Analyses, and Acceptance Criteria (ITAAC), addresses the Mitsubishi Heavy Industries, Ltd. Design Control Document (DCD), Tier 1, Table 2.12-1, revision 2, as providing specific design commitments and ITAAC for the physical security system to be used by North Anna 3 as an alternative method to the SRP 14.3.12, Physical Security Hardware-ITAAC (PS-ITAAC). The DCD or COLA Part 10 do not address the below listed PS-ITAAC. Verify and provide the status of any tentative changes to the PS-ITAAC listed below to properly reflect the applicant's intentions based on the SRP and the most current revision of the DCD. Listed below are the PS-ITAAC reference numbers from NUREG-800 Standard Review Plan (SRP) 14.3.12 Appendix "A" for clarification. (ADAMS Accession Number: ML093080140)

SRP Appendix "A" # 3b

SRP Appendix "A" #16c

Regulatory Basis: 10CFR 52.47(b)(1) The application must also contain: (1) The proposed inspections, tests, analyses, and acceptance criteria that are necessary and sufficient to provide reasonable assurance that, if the inspections, tests, and analyses are performed and the acceptance criteria met, a facility that incorporates the design certification has been constructed and will be operated in conformity with the design certification, the provisions of the Act, and the Commission's rules and regulations.

14.03.12-***

ITAAC # 2

North Anna 3, S-COL application revision 3, Part 10, Dated June 10, 2010 Combined License Application (including Inspection, Testing, Analyses, and Acceptance Criteria (ITAAC), section 2.2 states that Physical Security ITAAC (PS-ITAAC) are contained in the DCD Tier 1. The current revision of the DCD does not address several PS-ITAAC that were considered outside of the scope of the DCD. Review and confirm each PS-ITAAC listed below to verify that it properly reflects the applicant's intentions based on the SRP and the most current revision of the Combined License Application Part 10, Table C-1. Verify and provide the status of any tentative COL action items assigned. Explain what actions the applicant will take to revise PS-ITAAC to reflect the applicant's intentions in the S-COL application.

The below ITAAC reference numbers from Part 10, Table C-1., revision 3, have been cross-referenced with NUREG-800 Standard Review Plan (SRP) 14.3.12 Appendix "A" for clarification. (ADAMS Accession Number: ML093080140)

Part 10, Table C-1 # 1.b SRP Appendix "A" #1b
Part 10, Table C-1 # 2a SRP Appendix "A" #2a
Part 10, Table C-1 # 2b SRP Appendix "A" #2b
Part 10, Table C-1 # 2c SRP Appendix "A" #2c
Part 10, Table C-1 # 3a SRP Appendix "A" #3a
Part 10, Table C-1 # 3b SRP Appendix "A" #3c
Part 10, Table C-1 # 4a SRP Appendix "A" #4a
Part 10, Table C-1 # 4b SRP Appendix "A" #4b
Part 10, Table C-1 # 4c SRP Appendix "A" #4c
Part 10, Table C-1 # 5 SRP Appendix "A" #5
Part 10, Table C-1 # 6b SRP Appendix "A" #6b
Part 10, Table C-1 # 7 SRP Appendix "A" #7
Part 10, Table C-1 # 8a SRP Appendix "A" #8a
Part 10, Table C-1 # 8b SRP Appendix "A" #8b
Part 10, Table C-1 # 9 SRP Appendix "A" #9
Part 10, Table C-1 # 10.b SRP Appendix "A" #10b
Part 10, Table C-1 # 11.a-2 SRP Appendix "A" #11a.ii
Part 10, Table C-1 # 11.b-2 SRP Appendix "A" #11b.ii
Part 10, Table C-1 # 11c SRP Appendix "A" #11c
Part 10, Table C-1 # 11.d SRP Appendix "A" #11d
Part 10, Table C-1 # 12.a SRP Appendix "A" #12
Part 10, Table C-1 # 13.b-2 SRP Appendix "A" #13b.ii
Part 10, Table C-1 # 15.b SRP Appendix "A" #15b
Part 10, Table C-1 # 16.a-2 SRP Appendix "A" #16

Regulatory Basis: 10 CFR 52.47(b)(1) The application must also contain: (1) The proposed inspections, tests, analyses, and acceptance criteria that are necessary and sufficient to provide reasonable assurance that, if the inspections, tests, and analyses are performed and the acceptance criteria met, a facility that incorporates the design certification has been constructed and will be operated in conformity with the design certification, the provisions of the Act, and the Commission's rules and regulations.

14.03.12-***

ITAAC # 3

North Anna 3, S-COL application revision 3, Part 10, Dated June 10, 2010 Combined License Application (including Inspection, Testing, Analyses, and Acceptance Criteria (ITAAC), section 2.2 states that Physical Security PS-ITAAC are contained in the DCD Tier 1. The current revision of the DCD does not fully address the PS-ITAAC listed below. Explain how North Anna 3, will address these PS-ITAAC areas. Explain what actions the applicant will take to revise the PS-ITAAC to reflect the applicant's intentions in the S-COL application.

The below ITAAC reference numbers from (DCD), Tier 1, Table 2.12-1, revision 2, have been cross-referenced with NUREG-800 Standard Review Plan (SRP) 14.3.12 Appendix "A" for clarification. (ADAMS Accession Number: ML093080140)

Regulatory Basis: 10CFR 52.47(b)(1) The application must also contain: (1)
The proposed inspections, tests, analyses, and acceptance criteria that are necessary and sufficient to provide reasonable assurance that, if the inspections, tests, and analyses are performed and the acceptance criteria met, a facility that incorporates the design certification has been constructed and will be operated in conformity with the design certification, the provisions of the Act, and the Commission's rules and regulations.

DCD Table 2.12-1 # 1.a SRP Appendix "A" #1a
DCD Table 2.12-1 # 6.a SRP Appendix "A" #6a
DCD Table 2.12-1 # 10.a SRP Appendix "A" #10a
DCD Table 2.12-1 # 11.a.i SRP Appendix "A" #11a.i
DCD Table 2.12-1 # 11b.i SRP Appendix "A" #11b.i
DCD Table 2.12-1 # 12 SRP Appendix "A" #12
DCD Table 2.12-1 # 13.a SRP Appendix "A" #13a
DCD Table 2.12-1 # 13.b.i SRP Appendix "A" #13b.i
DCD Table 2.12-1 # 14 SRP Appendix "A" #14
DCD Table 2.12-1 # 15.a SRP Appendix "A" #15a
DCD Table 2.12-1 # 16.a.i SRP Appendix "A" #16a
DCD Table 2.12-1 # 16.b.i SRP Appendix "A" #16b

Request for Additional Information No. 5460

North Anna, Unit 3

Dominion

Docket No. 52-017

SRP Section: 03.02.02 - System Quality Group Classification

Application Section: 3.2.2

QUESTIONS for Engineering Mechanics Branch 2 (ESBWR/ABWR Projects) (EMB2)

03.02.02-***

The applicant does not endorse the R-COL response to RAI 03.02.02-1 concerning editions of codes and standards that apply to SSCs and does not address follow-up R-COL RAI 03.02.02-5 on the same subject.

10 CFR Part 50.55a. identifies specific editions of codes that are to be applied to systems and components classified as QG A, B and C. RG 1.206 states that the applicant should provide a table showing compliance with the NRC's regulations in 10 CFR 50.55a. This table should identify the piping system and associated supports. As part of the system quality group classification, RG1.206 C.I.3.2.2 further states that the applicant should identify the applicable industry codes and standards for each pressure-retaining component.

SRP 3.2.2 references SECY 93-087 and identifies that the staff should review applications using the newest codes and standards that have been endorsed by the NRC and unapproved editions will be reviewed on a case by case basis. FSAR Table 3.2-201 and the notes do not define editions for codes and standards or applicable codes and standards for certain SSCs, such as the UHS ESW pump house ventilation system. The applicant is requested to clarify which editions of codes and standards apply to the SSCs included in Table 3.2-201 and, for SSCs that reference codes and standards defined in the design bases, identify what commercial codes and standards apply. If this information is to be determined later, the applicant is requested to advise when this information will be available. If the codes and editions are cited in other sections of the US-APWR DCD or COLA FSAR, the applicant should identify those sections.

Request for Additional Information No. 5445

North Anna, Unit 3

Dominion

Docket No. 52-017

SRP Section: 13.06.06 - Cyber Security (Future SRP Section)

Application Section: 13.6.2.3

QUESTIONS for Integrated Security Coordination and Policy Branch (NSIR/DSP/ISCPB)

13.06.06-***

FSAR Section 13.6.2.3 states:

The North Anna Power Station Unit 3 Cyber Security Plan

([Reference 13.6-202](#)) provides for the protection of digital computer and

communication systems and networks as required by 10 CFR 73.54. If

there is a conflict between the North Anna Power Station Unit 3 Cyber

Security Plan and the US-APWR Cyber Security Program (DCD

Reference 13.6-8), the North Anna Power Station Unit 3 Cyber Security

Plan controls.

Dominion is not required to submit the US-APWR Cyber Security Program (DCD Reference 13.6-8) to the NRC by 10 CFR 73.54. Neither is the DC applicant. The reason Dominion provided the information in FSAR section 13.6.2.3 is not clear to the NRC staff. Please explain Dominion's intent for the staff review of 13.6.2.3.