

ArevaEPRDCPEm Resource

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Sent: Friday, April 29, 2011 10:28 AM
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ArevaEPRDCPEm Resource
Subject: Draft - U.S. EPR Design Certification Application RAI No. 486 (5637), FSAR Ch. 16, NEW
PHASE 4 RAI
Attachments: Draft RAI_486_CTSB_5637.doc

Attached please find draft RAI No. 486 regarding your application for standard design certification of the U.S. EPR. If you have any question or need clarifications regarding this RAI, please let me know as soon as possible, I will have our technical Staff available to discuss them with you.

Please also review the RAI to ensure that we have not inadvertently included proprietary information. If there are any proprietary information, please let me know within the next ten days. If I do not hear from you within the next ten days, I will assume there are none and will make the draft RAI publicly available.

Thanks,
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Request for Additional Information No. 486(5637),Revision 0

4/29/2011

U. S. EPR Standard Design Certification
AREVA NP Inc.
Docket No. 52-020
SRP Section: 16 - Technical Specifications
Application Section: TS 5.5.13, "Technical Specifications Bases Control Program"

QUESTIONS for Technical Specification Branch (CTSB)

16-323

NEW PHASE 4 RAI

OPEN ITEM

While reviewing proposed changes to the ABWR generic technical specifications (GTS), Specification 5.4, "TS Bases Control Program," the NRC staff recognized that this specification in the ABWR GTS more correctly speaks to the change processes governing FSAR information for a combined license, as stated in 10 CFR 52.98(c)(1) and (c)(2), than the bases control program for the US-EPR GTS. The GTS bases control program specification for the US-EPR design only references 10 CFR 50.59 as a change process governing FSAR information for a COL; it does not address changes to Tier 1, Tier 2*, and Tier 2 information in the "FSAR (as updated)." The FSAR contains the "plant-specific FSAR," which is not governed by 10 CFR 50.59 [according to 52.98(c)(1)]. The FSAR also contains the "site-specific information," which is mostly governed by 10 CFR 50.59 [according to 52.98(c)(2)]. The staff has identified this as an omission, and therefore an error in the current version of the GTS. The plant-specific TS for a COL that **references a design certification rule** should clearly cite the change processes for all categories of FSAR information. This will ensure that the appearance of a conflict is avoided between plant-specific TS 5.5.13.b, and 52.98(c) and Section VIII of the US-EPR DC rule appendix to Part 52.

Therefore, the applicant is requested to revise Specification 5.5.13 by replacing it with the proposed Specification 5.5.13 below (using paragraph indentation consistent with existing plant-specific TS format and the TS writer's guide). Comments [1] through [7] are included to clarify the reasons for the changes.

5.5 Programs and Manuals

5.5.13 Technical Specifications Bases Control Program

This program provides a means for processing changes to the Bases of these Technical Specifications (TS)[1] .

- a. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.
 - b. Licensees may make changes to Bases without prior NRC approval provided the changes do not require any of the following:
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5.5 Programs and Manuals

1. A change in the plant-specific [2] TS incorporated in the combined [3] license;
 2. A change to or a departure from Tier 1 or Tier 2* information in the FSAR (plant-specific Design Control Document [FSAR]) (as updated) pursuant to 10 CFR 52.98(c)(1) [4] ;
 3. A change to or a departure from Tier 2 information in the FSAR (plant-specific FSAR) (as updated) pursuant to 10 CFR 52.98(c)(1) that requires prior NRC approval [5] ;
 4. A change to site-specific information in the FSAR (as updated) pursuant to 10 CFR 52.98(c)(2) that requires prior NRC approval [6] ; or
 5. Any other change to the Bases that requires prior NRC approval. [7]
- c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the FSAR (as updated).
- d. Proposed changes that meet any of the criteria of 5.5.13.b above shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e).
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[1] "(TS)" was moved to here from the Specification title to be consistent with the TS writers guide (TSTF-GG-05-01 "WRITER'S GUIDE FOR PLANT-SPECIFIC IMPROVED TECHNICAL SPECIFICATIONS").

[2] Need this to avoid misinterpretation. Although plant-specific TS consist of generic TS and site-specific TS, according to design change rule appendix (Section IV.A.2.c), changes to PTS after COL is granted are governed by 10 CFR 50.90 (Section VIII.C.6).

[3] Consistency with Part 52.

[4] This reference directs one to the design change rule appendix Section VIII.A.4 and VIII.B.6, for Tier 1 and Tier 2* respectively; The FSAR contains the plant-specific FSAR.

[5] This reference directs one to the design change rule appendix Section VIII.B.5; note consistency between 50.59(c) criteria for changes to "FSAR (as updated)" - and Part 52 Design Certification Rule Section VIII.B.5.b criteria for changes to Tier 2 information in the "plant-specific FSAR".

[6] This reference leads to 50.59 but also addresses other changes to FSAR information that require prior NRC approval – and is therefore the more comprehensive reference.

[7] Retains possibility of another bases change requiring prior NRC approval, but removes reference to 50.59, because items b.1, b.2, b.3, and b.4 involve more than just FSAR changes governed by 50.59.