

CCNPP3eRAIPEm Resource

From: Arora, Surinder
Sent: Tuesday, May 24, 2011 2:54 PM
To: Robert.Poche@unistarnuclear.com; 'cc3project@constellation.com'
Cc: CCNPP3eRAIPEm Resource; McCann, Edward; Dreisbach, Jason; Colaccino, Joseph; Hearn, Peter; Wilson, Anthony; Vrahoretis, Susan
Subject: Draft RAI 311 SBPA 5809
Attachments: Draft RAI 311 SBPA 5809.doc

Rob,

Attached is Draft RAI No. 311 (eRAI No. 5809). You have until June 8, 2011 to review it and decide whether you need a clarification phone call to discuss any questions in the RAI before the final issuance. After the phone call or on June 8, 2011, the RAI will be finalized and sent to you for response. You will then have 30 days to provide a technically complete response or an expected response date for the RAI.

Thanks.

SURINDER ARORA, PE
PROJECT MANAGER,
Office of New Reactors
US Nuclear Regulatory Commission

Phone: 301 415-1421
FAX: 301 415-6406
Email: Surinder.Arora@nrc.gov

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Created By: Surinder.Arora@nrc.gov

Recipients:

"CCNPP3eRAIPEm Resource" <CCNPP3eRAIPEm.Resource@nrc.gov>
Tracking Status: None
"McCann, Edward" <Edward.McCann@nrc.gov>
Tracking Status: None
"Dreisbach, Jason" <Jason.Dreisbach@nrc.gov>
Tracking Status: None
"Colaccino, Joseph" <Joseph.Colaccino@nrc.gov>
Tracking Status: None
"Hearn, Peter" <Peter.Hearn@nrc.gov>
Tracking Status: None
"Wilson, Anthony" <Anthony.Wilson@nrc.gov>
Tracking Status: None
"Vrahoretis, Susan" <Susan.Vrahoretis@nrc.gov>
Tracking Status: None
"Robert.Poche@unistarnuclear.com" <Robert.Poche@unistarnuclear.com>
Tracking Status: None
"cc3project@constellation.com" <cc3project@constellation.com>
Tracking Status: None

Post Office: HQCLSTR01.nrc.gov

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Request for Additional Information No. 311 (eRAI 5809)
DRAFT
5/24/2011

Calvert Cliffs Unit 3
UniStar
Docket No. 52-016
SRP Section: 09.05.01 - Fire Protection Program
Application Section: 9.5.1

QUESTIONS for Balance of Plant Branch 1 (SBPA)

09.05.01-17

U.S. EPR FSAR Tier 2, Rev. 2, Section 9.5.1, Appendix 9A identifies fires as anticipated operational occurrences that could have radiological consequences in light of Part 20 requirements and RG 1.189 guidance (Regulatory Position C.1.2) for plant personnel, members of the public, and environment. A review of U.S. EPR FSAR Rev. 2, Table 9A-2 indicates that there are several instances where radiological effects are presumed but qualified with a footnote (No. 15, p.9A-93) leaving the specifics of the fire protection analyses to be completed by the COL applicant. For example, see the listed plant areas identified for fire protection analyses, including: Reactor Building, area 1; Fuel Building, areas 38, 39, 40, 41, 42, 44, 49, and 50; Nuclear Auxiliary Building, areas 52, 54, 56, 61, and 62; Radwaste Processing Building, area 67; and Access Building, areas 89, 91, 92, 93, 94, and 97.

A review of the UniStar COLA indicates that CCNPP-3 (Rev. 7) did not address the specific radiological aspects of footnote 15 (U.S. EPR FSAR Rev. 2, Table 9A-2, p.9A-93) in its submission even though it has an IBR statement for Appendix 9A and Table 9A-2 of the U.S. EPR FSAR. Note that CCNPP-3 FSAR Table 9.5-1 (footnote 3, p.9-70) identifies a similar commitment, but the supporting information is not included in the FSAR. Given the specific IBR of U.S. EPR FSAR Table 9A-2 and footnote 15, the applicant is requested to include a commitment in FSAR Tier 2, Section 9.5.1.1 to perform a site-specific FHA to address possible radiological effects from fires and the need for additional fire protection features to mitigate the consequences of a fire as mandated by FSAR Tier 2, Section 13.4, Table 13.4-1, Item 8 – Fire Protection Program. The scope of the analysis should consider the presence of different types of radioactive materials and ignition sources. At a minimum, the radioactive materials and potential releases of radioactivity should consider fires involving spent HEPA filters, spent charcoals, spent ion-exchange resins, and dry radioactive wastes.