

## ArevaEPRDCPEm Resource

---

**From:** WILLIFORD Dennis (AREVA) [Dennis.Williford@areva.com]  
**Sent:** Wednesday, June 01, 2011 3:13 PM  
**To:** Tesfaye, Getachew  
**Cc:** BENNETT Kathy (AREVA); DELANO Karen (AREVA); ROMINE Judy (AREVA); RYAN Tom (AREVA)  
**Subject:** Response to U.S. EPR Design Certification Application RAI No. 486 (5637), FSAR Ch. 16, NEW PHASE 4 RAI  
**Attachments:** RAI 486 Response US EPR DC.pdf

Getachew,

Attached please find AREVA NP Inc.'s response to the subject request for additional information (RAI). The attached file, "RAI 486 Response US EPR DC.pdf", provides a schedule since a technically correct and complete response to the 1 question cannot be provided at this time.

The following table indicates the respective pages in the response document, "RAI 486 Response US EPR DC.pdf," that contain AREVA NP's response to the subject question.

Question #	Start Page	End Page
RAI 486 — 16-323	2	3

A complete answer is not provided for the 1 question in RAI 486. The schedule for a technically correct and complete response to this question is provided below.

Question #	Response Date
RAI 486 — 16-323	July 7, 2011

Sincerely,

***Dennis Williford, P.E.***  
***U.S. EPR Design Certification Licensing Manager***  
***AREVA NP Inc.***

7207 IBM Drive, Mail Code CLT 2B  
Charlotte, NC 28262  
Phone: 704-805-2223  
Email: [Dennis.Williford@areva.com](mailto:Dennis.Williford@areva.com)

---

**From:** Tesfaye, Getachew [<mailto:Getachew.Tesfaye@nrc.gov>]  
**Sent:** Tuesday, May 03, 2011 6:56 AM  
**To:** ZZ-DL-A-USEPR-DL  
**Cc:** Le, Hien; DeMarshall, Joseph; Kowal, Mark; Hearn, Peter; Colaccino, Joseph  
**Subject:** U.S. EPR Design Certification Application RAI No. 486 (5637), FSAR Ch. 16, NEW PHASE 4 RAI

Attached please find the subject requests for additional information (RAI). A draft of the RAI was provided to you on April 29, 2011, and on May 2, 2011, you informed us that the RAI is clear and no further clarification is needed. As a result, no change is made to the draft RAI. 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 date for receipt of this information will be provided to the staff within the 30 day period so that the staff can assess how this information will impact the published schedule.

Thanks,  
Getachew Tesfaye  
Sr. Project Manager  
NRO/DNRL/NARP  
(301) 415-3361

**Hearing Identifier:** AREVA\_EPR\_DC\_RAIs  
**Email Number:** 3062

**Mail Envelope Properties** (2FBE1051AEB2E748A0F98DF9EEE5A5D4764C11)

**Subject:** Response to U.S. EPR Design Certification Application RAI No. 486 (5637),  
FSAR Ch. 16, NEW PHASE 4 RAI  
**Sent Date:** 6/1/2011 3:12:49 PM  
**Received Date:** 6/1/2011 3:12:53 PM  
**From:** WILLIFORD Dennis (AREVA)

**Created By:** Dennis.Williford@areva.com

**Recipients:**

"BENNETT Kathy (AREVA)" <Kathy.Bennett@areva.com>  
Tracking Status: None  
"DELANO Karen (AREVA)" <Karen.Delano@areva.com>  
Tracking Status: None  
"ROMINE Judy (AREVA)" <Judy.Romine@areva.com>  
Tracking Status: None  
"RYAN Tom (AREVA)" <Tom.Ryan@areva.com>  
Tracking Status: None  
"Tsfaye, Getachew" <Getachew.Tsfaye@nrc.gov>  
Tracking Status: None

**Post Office:** auscharm02.adom.ad.corp

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	2198	6/1/2011 3:12:53 PM
RAI 486 Response US EPR DC.pdf		67536

**Options**

**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**

**Response to**

**Request for Additional Information No. 486**

**5/02/2011**

**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)**

**Question16-323:****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:
    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
-

---

## 5.5 Programs and Manuals

---

5. Any other change to the Bases that requires prior NRC approval.<sup>[7]</sup>

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).

---

[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.

### Response to Question 16-323:

A response to this question will be provided by July 7, 2011.