ArevaEPRDCPEm Resource

From:	WILLIFORD Dennis (AREVA) [Dennis.Williford@areva.com]
Sent:	Wednesday, June 29, 2011 4:34 PM
То:	Tesfaye, Getachew
Cc:	BENNETT Kathy (AREVA); DELANO Karen (AREVA); ROMINE Judy (AREVA); RYAN Tom (AREVA); HOLM Jerald (EXTERNAL AREVA)
Subject:	Response to U.S. EPR Design Certification Application RAI No. 432, FSAR Ch. 15, OPEN ITEM, Supplement 7
Attachments:	RAI 432 Supplement 7 Response US EPR DC.pdf

Getachew,

AREVA NP provided a schedule for submitting a technically correct and complete response to the single question in RAI 432 to the NRC on September 15, 2010. The schedule was revised on October 27, 2010 in Supplement 1, November 29, 2010 in Supplement 2, January 17, 2011 in Supplement 3, March 29, 2011 in Supplement 4, April 22, 2011 in Supplement 5, and May 27, 2011 in Supplement 6.

Attached please find AREVA NP Inc.'s final response to the subject request for additional information (RAI). The attached file, "RAI 432 Supplement 7 Response US EPR DC.pdf" provides a technically correct and complete response to the single question.

Appended to this file are affected pages of the U.S. EPR Final Safety Analysis Report in redline-strikeout format which support the response to RAI 432 Question 15.00.02-1.

The following table indicates the respective pages in the response document, "RAI 432 Supplement 7 Response US EPR DC.pdf," that contain AREVA NP's response to the subject question.

Question #	Start Page	End Page
RAI 432 — 15.00.02-1	2	6

This concludes the formal AREVA NP response to RAI 432, and there are no questions from this RAI for which AREVA NP has not provided responses.

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: <u>Dennis.Williford@areva.com</u>

From: WILLIFORD Dennis (RS/NB)
Sent: Friday, May 27, 2011 5:13 PM
To: 'Tesfaye, Getachew'
Cc: BENNETT Kathy (RS/NB); DELANO Karen (RS/NB); ROMINE Judy (RS/NB); RYAN Tom (RS/NB); HOLM Jerald (External RS/NB)
Subject: Response to U.S. EPR Design Certification Application RAI No. 432, FSAR Ch. 15, OPEN ITEM, Supplement 6

Getachew,

AREVA NP provided a schedule for a technically correct and complete response to RAI 432 on September 15, 2010, October 27, 2010, November 29, 2010, January 17, 2011, March 29, 2011, and April 22, 2011.

NRC staff provided feedback to AREVA in a telephone call on May 11, 2011. The schedule for the response to RAI 432 is being revised to allow additional time for AREVA NP to interact with the NRC on this feedback.

AREVA NP's schedule for providing a technically correct and complete response to the one question in RAI 432 is provided below.

Question #	Response Date
RAI 432 — 15.00.02-1	June 30, 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

From: WELLS Russell (RS/NB)
Sent: Friday, April 22, 2011 4:10 PM
To: 'Tesfaye, Getachew'
Cc: HOLM Jerald (External RS/NB); BENNETT Kathy (RS/NB); DELANO Karen (RS/NB); ROMINE Judy (RS/NB); RYAN Tom (RS/NB)
Subject: Response to U.S. EPR Design Certification Application RAI No. 432, FSAR Ch. 15, OPEN ITEM, Supplement 5

Getachew,

AREVA NP provided a schedule for a technically correct and complete response to RAI 432 on September 15, 2010, October 27, 2010, November 29, 2010, January 17, 2011, and March 29, 2011. The schedule for the response to RAI 432 is being revised to allow additional time for AREVA NP to interact with the NRC.

AREVA NP's schedule for providing a technically correct and complete response to the question in RAI 432 is provided below.

Question #	Response Date
RAI 432 — 15.00.02-1	May 31, 2011

Sincerely,

Russ Wells U.S. EPR Design Certification Licensing Manager **AREVA NP, Inc.** 3315 Old Forest Road, P.O. Box 10935 Mail Stop OF-57 Lynchburg, VA 24506-0935 Phone: 434-832-3884 (work) 434-942-6375 (cell) Fax: 434-382-3884 <u>Russell.Wells@Areva.com</u>

From: WELLS Russell (RS/NB)
Sent: Tuesday, March 29, 2011 10:26 AM
To: Tesfaye, Getachew
Cc: HOLM Jerald (External RS/NB); BENNETT Kathy (RS/NB); DELANO Karen (RS/NB); ROMINE Judy (RS/NB); RYAN Tom (RS/NB)
Subject: Response to U.S. EPR Design Certification Application RAI No. 432, FSAR Ch. 15, OPEN ITEM, Supplement 4

Getachew,

AREVA NP provided a schedule for a technically correct and complete response to RAI 432 on September 15, 2010, October 27, 2010, November 29, 2010, and January 17, 2011. The schedule for the response to RAI 432 is being revised to allow additional time for AREVA NP to interact with the NRC.

AREVA NP's schedule for providing a technically correct and complete response to the question in RAI 432 is provided below.

Question #	Response Date
RAI 432 — 15.00.02-1	April 29, 2011

Sincerely,

Russ Wells U.S. EPR Design Certification Licensing Manager **AREVA NP, Inc.** 3315 Old Forest Road, P.O. Box 10935 Mail Stop OF-57 Lynchburg, VA 24506-0935 Phone: 434-832-3884 (work) 434-942-6375 (cell) Fax: 434-382-3884 <u>Russell.Wells@Areva.com</u>

From: BRYAN Martin (External RS/NB)
Sent: Monday, January 17, 2011 6:06 PM
To: 'Tesfaye, Getachew'
Cc: DELANO Karen (RS/NB); ROMINE Judy (RS/NB); BENNETT Kathy (RS/NB); HOLM Jerald (External RS/NB)
Subject: Response to U.S. EPR Design Certification Application RAI No. 432, FSAR Ch. 15, OPEN ITEM, Supplement 3

Getachew,

AREVA NP provided a schedule for a technically correct and complete response to RAI 432 on September 15, 2010, October 27, 2010, and November 29, 2010. Additional time is needed to address NRC comments and continue to interact with the NRC on the response.

AREVA NP's schedule for providing a technically correct and complete response to the question in RAI 432 is provided below.

Question #	Response Date
RAI 432 — 15.00.02-1	March 31, 2011

Sincerely,

Martin (Marty) C. Bryan U.S. EPR Design Certification Licensing Manager AREVA NP Inc. Tel: (434) 832-3016 702 561-3528 cell Martin.Bryan.ext@areva.com

From: BRYAN Martin (External RS/NB)
Sent: Monday, November 29, 2010 1:53 PM
To: 'Tesfaye, Getachew'
Cc: DELANO Karen (RS/NB); ROMINE Judy (RS/NB); BENNETT Kathy (RS/NB); HOLM Jerald (External RS/NB)
Subject: Response to U.S. EPR Design Certification Application RAI No. 432, FSAR Ch. 15, OPEN ITEM, Supplement 2

Getachew,

AREVA NP provided a schedule for a technically correct and complete response to RAI 432 on September 15, 2010 and a revised schedule on October 27, 2010. The schedule is being revised as shown below to allow additional time for NRC comments.

AREVA NP's schedule for providing a technically correct and complete response to the question in RAI 432 is provided below.

Question #	Response Date
RAI 432 — 15.00.02-1	January 18, 2011

Sincerely,

Martin (Marty) C. Bryan U.S. EPR Design Certification Licensing Manager AREVA NP Inc. Tel: (434) 832-3016 702 561-3528 cell Martin.Bryan.ext@areva.com From: BRYAN Martin (External RS/NB)
Sent: Wednesday, October 27, 2010 11:19 AM
To: 'Tesfaye, Getachew'
Cc: DELANO Karen (RS/NB); ROMINE Judy (RS/NB); BENNETT Kathy (RS/NB); HOLM Jerald (External RS/NB)
Subject: Response to U.S. EPR Design Certification Application RAI No. 432, FSAR Ch. 15, OPEN ITEM, Supplement 1

Getachew,

AREVA NP provided a schedule for a technically correct and complete response to RAI 432 on September 15, 2010. The schedule is being revised as shown below.

AREVA NP's schedule for providing a technically correct and complete response to the question in RAI 432 is provided below.

Question #	Response Date
RAI 432 — 15.00.02-1	November 30, 2010

Sincerely,

Martin (Marty) C. Bryan U.S. EPR Design Certification Licensing Manager AREVA NP Inc. Tel: (434) 832-3016 702 561-3528 cell Martin.Bryan.ext@areva.com

From: BRYAN Martin (External RS/NB)
Sent: Wednesday, September 15, 2010 11:55 AM
To: 'Tesfaye, Getachew'
Cc: DELANO Karen (RS/NB); ROMINE Judy (RS/NB); BENNETT Kathy (RS/NB); HOLM Jerald (External RS/NB)
Subject: Response to U.S. EPR Design Certification Application RAI No. 432, FSAR Ch. 15, OPEN ITEM

Getachew,

Attached please find AREVA NP Inc.'s response to the subject request for additional information (RAI). The attached file, "RAI 432 Response US EPR DC.pdf" provides a schedule for a response to the single question in this RAI.

The schedule for a technically correct and complete response to this question is provided below.

Question #	Response Date
RAI 432 – 15.00.02-1	October 29, 2010

Sincerely,

Martin (Marty) C. Bryan U.S. EPR Design Certification Licensing Manager AREVA NP Inc. From: Tesfaye, Getachew [mailto:Getachew.Tesfaye@nrc.gov]
Sent: Monday, August 16, 2010 12:33 PM
To: ZZ-DL-A-USEPR-DL
Cc: Liang, Chu-Yu; Lu, Shanlai; Donoghue, Joseph; Carneal, Jason; Colaccino, Joseph; ArevaEPRDCPEm Resource
Subject: U.S. EPR Design Certification Application RAI No. 432 (4958), FSAR Ch. 15, OPEN ITEM

Attached please find the subject requests for additional information (RAI). A draft of the RAI was provided to you on August 6, 2010, and on August 16, 2010, 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: 3171

Mail Envelope Properties (2FBE1051AEB2E748A0F98DF9EEE5A5D47AF38B)

Subject:Response to U.S. EPR Design Certification Application RAI No. 432, FSAR Ch.15, OPEN ITEM, Supplement 7Sent Date:6/29/2011 4:34:10 PMReceived Date:6/29/2011 4:34:15 PMFrom: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 "HOLM Jerald (EXTERNAL AREVA)" <jerald.holm.ext@areva.com> Tracking Status: None "HOLM Jerald (EXTERNAL AREVA)" <jerald.holm.ext@areva.com> Tracking Status: None "Tesfaye, Getachew" <Getachew.Tesfaye@nrc.gov> Tracking Status: None

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Date & Time 6/29/2011 4:34:15 PM 253176

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

Response to

Request for Additional Information No. 432(4958), Revision 1, Supplement 7

8/16/2010

U.S. EPR Standard Design Certification AREVA NP Inc. Docket No. 52-020 SRP Section: 15.00.02 - Review of Transient and Accident Analysis Methods 01/2006 Application Section: 15.0.0.3.1

QUESTIONS for Reactor System, Nuclear Performance and Code Review (SRSB)

Question 15.00.02-1:

OPEN ITEM:

In EPR FSAR Tier 2, Revision 1, Section 15.0.0.3.1, "Design Plant Conditions and Initial Conditions", indicated that a heat balance measurement uncertainty of +/- 22 MWt is applicable to the rated core thermal power of 4590 MWt (approximately 0.48% uncertainty) for the maximum core power assumed in the accident analyses. The core power is determined using a secondary-side heat balance. The relatively low heat balance uncertainty is achieved by using an ultrasonic flow meter for the feedwater flow rate. The maximum power level assumed in the accident analyses are described in Table 15.0.4, "Nuclear Steam Supply System Power Levels Assumed in the Accident Analyses" and Table 15.0.5, "Plant Parameters Used in Accident Analyses" lists the nominal plant parameters for the accident analyses. Uncertainties in initial plant conditions are applied in accordance with the applicable approved methodologies.

However, EPR FSAR Revision 1 does not provide sufficient information of the instrumentation and/or methodology for the main feedwater flow measurement, nor provide a basis for the statement that the main feedwater flow measurement supports a 0.48% power uncertainty.

Please provide the following:

- 1) Describe the mechanism, such as the EPR FSAR and ITAAC and/or a COL Action Item, by which the information will be provided to support claimed 0.48% power measurement uncertainty and how it will be verified and confirmed.
- 2) The following information should be provided to support the claimed 0.48% power measurement uncertainty:
 - A. A description of the instrumentation and methodology used for the main feedwater flow measurement and calorimetric power measurement.
 - B. All of the following:
 - a. A reference to the NRC approval of the main feedwater and power measurement methodology, instrumentation, and associated uncertainties. Or
 - b. The instrument string, including applicable sensors or transducers, process rack, analog/digital converter, process computer, and readout devices, etc., for each parameter measured;
 - c. The accuracy of allowance associated with each instrument component, such as sensor reference, calibration, and measurement accuracies, respectively; rack calibration and measurement accuracies; sensor pressure and temperature effects; rack pressure and temperature effects; drift; process measurement accuracy; instrument range, span, and operation limits, etc.;
 - d. The methodology for combining uncertainties, allowances, or errors of the instrument components associated with each parameter to arrive at the overall uncertainty of each measured parameter; and

e. The methodology used to arrive at the total uncertainties for the main feedwater flow rate and reactor thermal power, respectively.

Response to Question 15.00.02-1:

 The 0.48 percent power measurement uncertainty is verified by a calculation performed in accordance with Reference 1 and Reference 2. Reactor power is confirmed by a continuous secondary side calorimetric, which uses input that meets the uncertainty requirements specified in Table 15.00.02-1-1. U.S. EPR FSAR Tier 2, Section 7.7.2.3.5 will be revised to provide additional details regarding the secondary side calorimetric power measurement.

U.S. EPR FSAR Tier 2, Table 1.8-2 and Section 7.7.2.3.5 will be revised to add a COL Item, which accounts for calculating the primary power calorimetric uncertainty.

U.S. EPR FSAR Tier 1, Section 2.2.1.4.0 and Table 2.2.1-5 will be revised to add an ITAAC item that specifies power uncertainty analyses using vendor certified instrument accuracies.

- 2. The U.S. EPR reactor control, surveillance, and limitation system (RCSL) implements a continuous secondary side calorimetric that monitors and limits core power. This limitation function, or the reactor power limitation with respect to thermal power, is addressed in U.S. EPR FSAR Tier 2, Section 7.7.2.3.5.
 - A. During steady state operation, this function relies on the maximum value of the continuous secondary side calorimetric and the reactor coolant system (RCS) enthalpy indication of reactor power as input. The RCS enthalpy indication of reactor power is calibrated to the secondary side calorimetric during 100 percent steady state conditions. Although the RCS enthalpy indication of reactor power has more uncertainty than the secondary side calorimetric, its uncertainty is smaller than that of the power range excore detectors, with less signal noise. Unlike the power range ex-core detectors, the RCS enthalpy indication of reactor power is not decalibrated by changes in downcomer temperature. U.S. EPR FSAR Tier 2, Section 7.7.2.3.5 will be revised by removing the power range ex-core detector indication of reactor power as an input to this limitation function.

The continuous secondary side calorimetric uses the following sensors and parameters as input:

- Feedwater flow rate for each train of feedwater (refer to U.S. EPR FSAR Tier 2, Section 10.4.7.5 and Figure 10.4.7-1).
- Feedwater temperature for each train of feedwater (refer to U.S. EPR FSAR Tier 2, Section 10.4.7.5 and Figure 10.4.7-1).
- Feedwater pressure for each train of feedwater. U.S. EPR FSAR Tier 2, Figure 10.4.7-1 will be revised to show the pressure sensors.
- Steam generator (SG) blowdown flow rate for each SG (refer to U.S. EPR FSAR Tier 2, Figure 10.4.8-1).
- SG blowdown temperature for each SG (refer to U.S. EPR FSAR Tier 2, Figure 10.4.8-1).

- RCS charging flow rate (refer to U.S. EPR FSAR Tier 2, Section 9.3.4.5 and Figure 9.3.4-1, Sheet 5 of 9).
- RCS charging flow temperature (refer to U.S. EPR FSAR Tier 2, Section 9.3.4.5 and Figure 9.3.4-1, Sheet 5 of 9).
- RCS charging flow pressure (refer to U.S. EPR FSAR Tier 2, Section 9.3.4.5 and Figure 9.3.4-1, Sheet 5 of 9).
- RCS letdown flow rate from both high pressure reducing stations in the chemical and volume control system (refer to U.S. EPR FSAR Tier 2, Section 9.3.4.5 and Figure 9.3.4-1, Sheet 1 of 9).
- RCS letdown flow temperature (refer to U.S. EPR FSAR Tier 2, Section 9.3.4.5 and Figure 9.3.4-1, Sheet 1 of 9).
- RCS letdown flow pressure (a constant value is assumed).
- Main steam pressure for each SG (refer to U.S. EPR FSAR Tier 2, Figure 10.3-1).
- The power losses from the RCS (including the control rod drive mechanisms) to the ambient air (a constant value is assumed).
- The reactor coolant pump (RCP) power (a constant value is assumed).
- The pressurizer heater power (a constant value is assumed).
- The moisture content of the main steam (a constant value is assumed).

The enthalpies of the main steam flow, main feedwater flow, SG blowdown flow, charging flow, and letdown flow are calculated using the corresponding pressures and/or temperatures.

The algorithm for the continuous secondary calorimetric calculation of reactor thermal power is performed according to methodology outlined in Reference 1 and approved by the NRC in Reference 2.

Β.

a. The methodology outlined in the Response to Question 2A has been approved by the NRC (see Reference 2). As an analytical requirement, 0.48 percent uncertainty on core thermal power was assumed in the safety analysis. However, the measurement requirements for the U.S. EPR allow the secondary side calorimetric to calculate reactor thermal power within a \pm 0.40 percent uncertainty. In order to achieve the required uncertainty in the secondary side calorimetric algorithm, the elemental uncertainties of the instrument strings and parameters discussed in this response are provided in Table 15.00.02-1-1.

FSAR Impact:

U.S. EPR FSAR Tier 2, Table 1.8-2, Section 7.7.2.3.5, and Figure 10.4.7-1 will be revised as described in the response and indicated on the enclosed markup.

U.S. EPR FSAR Tier 1, Section 2.2.1.4.0 and Table 2.2.1-5 will be revised as described in the response and indicated on the enclosed markup.

References:

- 1. Engineering Report ER-157P, Topical Report, Revision 8, "Supplement to Topical Report ER-80P: Basis for a Power Uprate with the LEFM Check or CheckPlus System," Cameron Measurement Systems.
- Final Safety Evaluation by the Office of Nuclear Reactor Regulation, Engineering Report ER-157P, Topical Report, Revision 8, "Supplement to Topical Report ER-80P: Basis for a Power Uprate with the LEFM Check or CheckPlus System," Cameron Measurement Systems," Project No. 1370.

Table 15.00.02-1-1—Elemental Uncertainties	s of the Instrument Strings and
Parameters	

Input	Maximum Allowable Uncertainty at 100% NP
Feedwater Flow Rate	0.28% of the Actual Value
Feedwater Temperature	± 0.6°F of the Actual Value
Feedwater Pressure	± 25 psia of the Actual Value
Steam Pressure	± 25.4 psia of the Actual Value
Blowdown Flow Rate	± 5% of the Actual Value
Blowdown Temperature	± 3.0°F of the Actual Value
Charging Flow Rate	± 4% of the Actual Value
Charging Temperature	± 3% of the Actual Value
Charging Pressure	± 3% of the Actual Value
Letdown Flow Rate	± 4% of the Actual Value
Letdown Temperature	± 3% of the Actual Value
Letdown Pressure	± 3% of the Actual Value
Reactor Coolant Pump Power	± 20% of the Actual Value
Power Losses from the Reactor Coolant System	± 20% of the Actual Value
Pressurizer Heater Power	± 20% of the Actual Value
Steam Moisture Content	± 0.25% of the Actual Value

U.S. EPR Final Safety Analysis Report Markups

ÉPR	U.S. EPR FINAL SAFETT ANALTSIS REPORT	
3.21	RCS piping shown as ASME Code Section III on Figure 2.2.1-1 is installed in accordance with an ASME Code Section III Design Report.	
3.22	Pressure boundary welds in RCS piping shown as ASME Code Section III on Figure 2.2.1-1 are in accordance with ASME Code Section III.	
3.23	RCS piping shown as ASME Code Section III on Figure 2.2.1-1 retains pressure boundary integrity at design pressure.	
3.24	RCS piping shown as ASME Code Section III on Figure 2.2.1-1 is installed and inspected in accordance with ASME Code Section III requirements Deleted.	
3.25	Components listed in Table 2.2.1-1 as ASME Code Section III, other than RPV internals, are designed in accordance with ASME Code Section III requirements.	
3.26	Components listed in Table 2.2.1-1 as ASME Code Section III, other than RPV internals, are fabricated in accordance with ASME Code Section III requirements.	
3.27	Pressure boundary welds on components listed in Table 2.2.1-1 as ASME Code Section III, other than RPV internals, are in accordance with ASME Code Section III requirements.	
3.28	Components listed in Table 2.2.1-1 as ASME Code Section III, other than RPV internals, retain pressure boundary integrity at design pressure.	
3.29	The RCP flywheel maintains its structural integrity during an overspeed event.	
3.30	Components listed in Table 2.2.1-1 as ASME Code Section III are installed in accordance with ASME Code Section III requirements.	
4.0	Instrumentation and Controls (I&C) Design Features, Displays, and Controls	
4.1	Displays listed in Tables 2.2.1-2—Equipment and Valve Actuator Power Supplies and Controls and 2.2.1-3—Instrumentation Power Supplies, Classification, and Displays are retrievable in the main control room (MCR) and remote shutdown station (RSS) as listed in Tables 2.2.1-2 and 2.2.1-3.	
4.2	The RCS system equipment controls are provided in the MCR and RSS as listed in Table 2.2.1-2.	
4.3	Equipment listed as being controlled by a priority and actuator control system (PACS) module in Table 2.2.1-2 responds to the state requested by a test signal.	
4.4	Instrumentation providing input to the uncertainty in power supports the power uncertainty assumed in the safety analysis.	
5.0	Electrical Power Design Features	
5.1	The components designated as Class 1E listed in Tables 2.2.1-2 and 2.2.1-3 are powered from the Class 1E divisions as listed in Tables 2.2.1-2 and 2.2.1-3 in a normal or alternate feed condition.	



Table 2.2.1-5—Reactor Coolant System ITAAC (10 Sheets)						
	✓Commitment Wording	Inspections, Tests, Analyses	Acceptance Criteria			
<u>4.</u>	4 Instrumentation providing input to the uncertainty in power supports the power uncertainty assumed in the safety analysis.	A power uncertainty analysis using vendor certified instrument accuracies will be performed.	Power uncertainty analyses using vendor certified instrument accuracies is equal to or less than the power uncertainty assumed in the safety analysis.			
5.	1 The components designated as Class 1E in Tables 2.2.1-2 and 2.2.1-3 are powered from the Class 1E Division as listed in Tables 2.2.1-2 and 2.2.1-3 in a normal or alternate feed condition.	a. Testing will be performed for <u>as-built</u> components designated as Class 1E in Tables 2.2.1-2 and 2.2.1-3 by providing a test signal in each normally aligned division.	a. The test signal provided in the normally aligned division is present at the respective Class 1E <u>as-</u> <u>built</u> components identified in Tables 2.2.1-2 and 2.2.1-3.			
		b. Testing will be performed for <u>as-built</u> components designated as Class 1E in Tables 2.2.1-2 and 2.2.1-3 by providing a test signal in each division with the alternate feed aligned to the divisional pair.	b. The test signal provided in each division with the alternate feed aligned to the divisional pair is present at the respective Class 1E <u>as-built</u> components identified in Tables 2.2.1-2 and 2.2.1-3.			
5.	2 Valves listed in Table 2.2.1- 2 fail as indicated in Table 2.2.1-2 on loss of powerDeleted.	Testing will be performed for the <u>as built</u> valves listed in Table 2.2.1-2 to fail as indicated in Table 2.2.1-2 on loss of power.	Following loss of power, the as built valves listed in Table 2.2.1-2 fail as indicated in Table 2.2.1-2.			
5.	The power supply arrangement is such that only two emergency diesels are required to operate to supply power to the minimum number of PZR heaters.	An analysis will be performed.	An analysis exists and concludes that only two emergency diesel generators are required to operate to supply power to the minimum number of emergency PZR heaters, which are rated at 144 kW per heater.			



Table 1.8-2—U.S. EF	R Combined License Information Items
15.00.02-1	Sheet 20 of 39

Item No.	Description	Section
<u>7.1-2</u>	A COL applicant that references the U.S. EPR design certification will, following selection of the actual plant operating instrumentation and calculation of the instrumentation uncertainties of the operating plant parameters, prior to fuel load, calculate the primary power calorimetric uncertainty. The calculations will be completed using an NRC acceptable method and confirm that the safety analysis primary power calorimetric uncertainty bounds the calculated values.	<u>7.7.2.3.5</u>
8.1-1	A COL applicant that references the U.S. EPR design certification will provide site-specific information describing the interface between the offsite transmission system, and the nuclear unit, including switchyard interconnections.	8.1.1
8.1-2	A COL applicant that references the U.S. EPR design certification will identify site-specific loading differences that raise EDG or Class 1E battery loading, and demonstrate the electrical distribution system is adequately sized for the additional load.	8.1.3
8.2-1	A COL applicant that references the U.S. EPR design certification will provide site specific information regarding the offsite transmission system and their connections to the station SWYD.	8.2.1.1
8.2-2	A COL applicant that references the U.S. EPR design certification will provide site-specific information for the switchyard layout design.	8.2.1.2
8.2-3	8.2-3 A COL applicant that references the U.S. EPR design certification will provide site-specific information that identifies actions necessary to restore offsite power and use available nearby power sources when offsite power is unavailable.	
8.2-4	A COL applicant that references the U.S. EPR design certification will provide a site-specific grid stability analysis.	8.2.2.4
8.2-5	A COL applicant that references the U.S. EPR design certification will provide site-specific information for the protective devices that control the switchyard breakers and other switchyard relay devices.	8.2.1.2
8.2-6	A COL applicant that references the U.S. EPR design certification will provide site-specific information for the station switchyard equipment inspection and testing plan.	8.2.2.5



Loss of All MFW Pumps

A low MFW flowrate combined with a high reactor power level is the criteria for the detection of the loss of all MFW pumps. In this case the limitation function will initiate a non-safety-related reactor trip, activate turbine trip, and close all FW FLCVs. The reactor trip signal resets this actuation.

Imbalance of Feedwater Flowrate and Reactor Power During Startup Phase

Indications of a low enough feedwater flowrate and a high enough reactor power leads to blocking the withdrawal of any RCCA. This prevents an increase of the reactor power without an increase of the MFW flowrate during the startup phase.

7.7.2.3.4 Reactor Power Limitation with respect to Generator Power

This limitation function limits reactor power after loss of generator load events. The objective is to limit the energy level of the primary system in case of load rejections or turbine trip in order to avoid reaching the RT criteria. This will be done by initiating a PT. The target reactor power level is determined by:

- The maximum of generator power.
- The minimum PT target power.

In case of turbine trip or load rejection to house load, the plant is first stabilized at minimum PT target power while heat removal is performed via the turbine bypass valves. A further controlled reduction to the minimum load reactor power will then be done by ACT control.

7.7.2.3.5 Reactor Power Limitation with respect to Thermal Power

The reactor power limitation with respect to thermal power function is designed to maintain reactor power below 100 percent rated thermal power. This function provides the capability to adjust turbine power and indirectly reactor power due to cooling tower temperature changes that affect overall plant efficiencies. The reactor power signal is selected from the highest of the following:

15.00.02-1

Continuous secondary calorimetric calculation (i.e., above 25 percent power).

- Median select excore power range indication of reactor power.
- Median select RCS enthalpy indication of reactor power.

The continuous secondary side calorimetric uses the following sensors and parameters as input:



15.00.02-1	• <u>Feedwater flow rate for each train of feedwater (refer to Section 10.4.7.5 and Figure 10.4.7-1).</u>
	• <u>Feedwater temperature for each train of feedwater (refer to Section 10.4.7.5 and Figure 10.4.7-1).</u>
	• <u>Feedwater pressure for each train of feedwater (refer to Figure 10.4.7-1).</u>
	• Steam generator blowdown flow rate for each steam generator (refer to Figure 10.4.8-1).
	• <u>Steam generator blowdown temperature for each steam generator (refer to Figure 10.4.8-1).</u>
	• <u>Reactor coolant system charging flow rate (refer to Section 9.3.4.5 and Figure 9.3.4-1, Sheet 5 of 9).</u>
	• Reactor coolant system charging flow temperature (refer to Section 9.3.4.5 and Figure 9.3.4-1, Sheet 5 of 9).
	• <u>Reactor coolant system charging flow pressure (refer to Section 9.3.4.5 and Figure 9.3.4-1, Sheet 5 of 9).</u>
	• Reactor coolant system letdown flow rate from both high pressure reducing stations in the chemical and volume control system (refer to Section 9.3.4.5 and Figure 9.3.4-1, Sheet 1 of 9).
	• <u>Reactor coolant system letdown flow temperature (refer to Section 9.3.4.5 and Figure 9.3.4-1, Sheet 1 of 9).</u>
	• <u>Reactor coolant system letdown flow pressure (a constant value is assumed).</u>
	• Main steam pressure for each steam generator (refer to Figure 10.3-1).
	• <u>The power losses from the reactor coolant system (including the control rod drive</u> mechanisms) to the ambient air (a constant value is assumed).
	• The reactor coolant pump power (a constant value is assumed).
	• The pressurizer heater power (a constant value is assumed).
	• The moisture content of the main steam (a constant value is assumed).
	The enthalpy of the main steam flow, main feedwater flow, steam generator blowdown flow, charging flow, and letdown flow are calculated using the corresponding pressures and/or temperatures. The continuous secondary calorimetric calculation of reactor thermal power is performed according to methodology outlined in Reference 3, which has been accepted by the NRC, per Reference 4. As an analytical requirement, 0.48 percent uncertainty on core thermal power was assumed
	in the safety analysis. However, the measurement requirements for the U.S. EPR



15.00.02-1

allow the secondary side calorimetric to caluculate reactor thermal power within a ± 0.40 percent uncertainty. To achieve the required uncertainty in the secondary side calorimetric algorithm, the elemental uncertainties of the instrument strings and parameters, previously mentioned, are verified to comply with requirements provided in Table 7.7-2—Elemental Uncertainties for Secondary Side Calorimetric.

The control logic compares the mismatch between main turbine and generator load and the highest of the previously listed power signals and takes actions when reactor power exceeds 100 percent. There are two thresholds. The intent of the first is to alert the operator and take action to prevent further power increase. The intent of the second threshold is to reduce power to 100 percent.

A COL applicant that references the U.S. EPR design certification will, following selection of the actual plant operating instrumentation and calculation of the instrumentation uncertainties of the operating plant parameters, prior to fuel load, calculate the primary power calorimetric uncertainty. The calculations will be completed using an NRC acceptable method and confirm that the safety analysis primary power calorimetric uncertainty bounds the calculated values.

7.7.2.3.6 Rod Drop Limitation

The objective of this limitation function is to detect the spurious drop of RCCAs and to reduce the turbine generator power level to match the reactor power reduction due to the dropped RCCAs.

This limitation function is designed to avoid reactivity compensation by core control functions after the RCCAs drop and to avoid the low departure from nucleate boiling (DNBR) and high linear power density (HLPD) protective actuations after one or more RCCAs drop into the core.

Rod drop is detected in the protection system (PS) based on the RCCA position measurements. In each PS division a quarter of the RCCAs are monitored. Four (i.e., one per PS division) RCCA drop detection logic signals are acquired in RCSL and voted one out of four.

The other criterion indicating an RCCA drop is derived from the decrease of the reactor power level (i.e., neutron flux from power range detectors). The derivative of the four nuclear power signals are compared with a low threshold and voted one out of four.

The limitation will be actuated if both criteria coincide and no intended PT has been initiated by other limitation functions.



15.00.02-1

7.7.4 References

1. ANP-10304, Revision 1, "U.S. EPR Diversity and Defense-in-Depth Assessment Technical Report," AREVA NP Inc., December 2009.

2. NUREG-0800, Standard Review Plan, Section 7.7, "Control Systems," Revision 5, U.S. Nuclear Regulatory Commission, March 2007.

- 3. <u>ER-157P, Topical Report, Revision 8, "Supplement to Topical Report ER-80P:</u> <u>Basis for a Power Uprate with the LEFM Check or CheckPlus System," Cameron</u> <u>Measurement Systems.</u>
- Final Safety Evaluation by the Office of Nuclear Reactor Regulation, Engineering Report ER-157P, Topical Report, Revision 8, "Supplement to Topical Report ER-80P: Basis for a Power Uprate with the LEFM Check or CheckPlus System," Cameron Measurement Systems," Project No. 1370.



Table 7.7-2— Elemental Uncertainties for Secondary Side Calorimetric

Input	Maximum Allowable Uncertainty at 100% NP
<u>Feedwater Flow Rate</u>	0.28% of the Actual Value
Feedwater Temperature	<u>± 0.6°F of the Actual Value</u>
<u>Feedwater Pressure</u>	<u>± 25 psia of the Actual Value</u>
Steam Pressure	<u>± 25.4 psia of the Actual Value</u>
Blowdown Flow Rate	<u>± 5% of the Actual Value</u>
Blowdown Temperature	$\pm 3.0^{\circ}$ F of the Actual Value
Charging Flow Rate	± 4% of the Actual Value
Charging Temperature	± 3% of the Actual Value
Charging Pressure	± 3% of the Actual Value
Letdown Flow Rate	± 4% of the Actual Value
Letdown Temperature	± 3% of the Actual Value
Letdown Pressure	± 3% of the Actual Value
Reactor Coolant Pump Power	<u>± 20% of the Actual Value</u>
Power Losses from the Reactor Coolant System	± 20% of the Actual Value
Pressurizer Heater Power	± 20% of the Actual Value
<u>Steam Moisture Content</u>	± 0.25% of the Actual Value



U.S. EPR FINAL SAFETY ANALYSIS REPORT

DMSION 1 DMSION 2 DMSION 3 DMSION 4



Page 10.4-57

REV 003 LAB02T2

NSC SSC SSC CLASS

Revision 3—Interim