

4/28/2011

76 FR 23845

**NRCREP Resource**

**From:** Gayle Elliott [gayle.elliott@areva.com]  
**Sent:** Tuesday, July 05, 2011 2:19 PM  
**To:** NRCREP Resource  
**Subject:** Response from "Comment on NRC Documents"

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RULES AND DIRECTIVES  
GENERAL

Below is the result of your feedback form. It was submitted by

Gayle Elliott (gayle.elliott@areva.com) on Tuesday, July 05, 2011 at 14:18:46

Document\_Title: DG-1197, "Inservice Inspection of Prestressed Concrete Containment Structures with Grouted Tendons"

Comments: Comments on DG-1197:

1. Page 2, Section B. Discussion, Background- 3rd Paragraph, line 2- Change the ultimate strength value for the grouted tendon from 1612 tons to 1725 tons. The EPR tendon ultimate design strength is nominally 1725 tons. There are no known impacts to the ISI objectives in the guide by making this change.
2. Page 5, Section B. Discussion, Monitoring Alternatives for Grouted Tendons, Monitoring the Prestress Level and Pressure Testing (Alternative A)- Last paragraph, line 5- The pressure testing interval in the first 10 years should be consistent with the Integrated Leakrate Testing frequency in 10 CFR 50, Appendix J, Type A testing. Both the ILRT and Pressure Testing requires the unit to be shutdown and the containment pressurized. This is a significant impact on the plant availability. The test frequency must be consistent.
3. Page 8, Section C. Regulatory Position, paragraph 1.d.- Same comment as item 2. Test interval should be consistent with the ILRT for both Alternative A and Alternative B.
4. Page 8, Section C. Regulatory Position, paragraph 2.a., item (3)- Add gamma tendons. The representative manner for testing a gamma tendon is "two gamma tendons for the design using two 90 degree families of tendons." The US EPR design utilizes a gamma tendon for the dome prestressing. The gamma tendon is anchored at the base of the containment in the tendon gallery and extends vertically up and over the dome and is anchored at the dome ring girder.
5. For completeness, the requirements for the inspection of greased tendons is in RG 1.35 should be included in DG-1197. RG 1.35 is applicable to non-grouted containments. The requirements for inspection of the greased tendons in un-grouted test tendons in the grouted containment should be added to DG-1197.
6. Page 9, Figure 2- Same comment as item 2. Test interval should be consistent with the ILRT. Also, the test interval shown after 10 years should reflect once every 10 years for Alternative B.
7. Page 10, paragraph 3.1.1.b (3)- same comment as item 4. Add gamma tendons.
8. Page 11, Figure 3- Add figure for dome tendons that are at 90 degrees. Indicate 2 typical locations for test tendons and instrumentation across the center of the dome at 90 degrees.
9. Page 12, paragraph 3.1.4.a- Same comment as item 2. Test interval should be consistent with the ILRT. Note that the relaxed test frequency is recognized in this paragraph for Alternative B, whereas, it is only recognized for Alternative A in Regulatory Position 1.d.
10. Page 14, paragraph 4.2.a(1)- Inspection of Anchorage Assemblies- Add gamma tendons. "A minimum of 4 gamma tendons, two of which are located in each 90 degree group (two families of tendons), randomly distributed to provide random sampling."

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SUNSI Review Complete  
Template = ADM-013

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