

CCNPP3eRAIPEm Resource

From: Arora, Surinder
Sent: Tuesday, September 13, 2011 3:56 PM
To: Infanger, Paul
Cc: CCNPP3eRAIPEm Resource; Pieringer, Paul; Junge, Michael; Colaccino, Joseph; Ford, Tanya; Wilson, Anthony; Vrahoretis, Susan
Subject: Draft RAI 319 COLP 6037
Attachments: Draft RAI 319 COLP 6037.doc

Paul,

Attached is Draft RAI No. 319 (eRAI No. 6037). You have until September 27, 2011 to review it and decide whether you need a clarification phone call to discuss the questions in the RAI before the final issuance. After the phone call or on September 27, 2011, the RAI will be finalized and sent to you for a response. You will then have 30 days to provide a technically complete response or an expected response date for the RAI.

Thanks.

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Request for Additional Information No. 319 (eRAI 6037)
DRAFT
9/13/2011

Calvert Cliffs Unit 3
UniStar
Docket No. 52-016
SRP Section: 18 - Human Factors Engineering
Application Section: 18.7,8,12

QUESTIONS for Operating Licensing and Human Performance Branch (AP1000/EPR Projects) (COLP)

18-2

Regulatory guidance: 52.79(c) (1) The final safety analysis report need not contain information or analyses submitted to the Commission in connection with the design approval, *provided, however*, that the final safety analysis report must either include or incorporate by reference the standard design approval final safety analysis report and must contain, in addition to the information and analyses otherwise required, information sufficient to demonstrate that the characteristics of the site fall within the site parameters specified in the design approval.

Evaluation: CCNPP FSAR, Revision 7 contains information that is inconsistent with U.S. EPR FSAR, Revision 3. For example:

1. CCNPP Section 18.7 adds supplemental information on Minimum Inventory. However, the EPR FSAR explains that minimum inventory is no longer singled out since the task analysis identifies a complete inventory. Since an ITAAC tracks this work, and ITAAC are the COLA's responsibility, plant specific inventory is within the scope of the ITAAC. This seems to be a less confusing path than adding a list to the CCNPP FSAR. Also it is not clear why wind and temperature data would be plant specific (perhaps it is because the elevations have been specifically designated). If the minimum inventory information is retained, it also raises the question of whether it is a complete list. For example, there is no indication of switchyard status. Typically, the control room would have switchyard breaker and disconnect indications as well as normal electrical power feed into the plant.
2. CCNPP Section 18.8 references section 18.8.2 of the EPR FSAR. This creates circular referencing. It is preferred that the CCNPP FSAR just reference Chapter 13 similar to what is done in CCNPP FSAR, Section 18.9. An alternative would be to directly address the COL information item by describing the HFE principles that will be applied to procedures (for example, the typical guidance incorporated in a writer's guide).
3. CCNPP Section 18.12 references a COL item which no longer exists in EPR FSAR, Revision 3. But more importantly, it appears the EPR DCD is being used as a template with new information provided and EPR FSAR information deleted to establish a site specific version. A quick comparison between the EPR and CCNPP documents indicates that the CCNPP document would probably stand on its own if evaluated against NUREG-0711 but it has some significant

differences from what is in the EPR FSAR which is what will be approved. Some of these differences represent deviations, and as such, need a basis.

Information Request: Update the CCNPP FSAR to address EPR FSAR, Revision 3 with specific attention to the examples described above.