

## ArevaEPRDCPEm Resource

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**From:** WILLIFORD Dennis (AREVA) [Dennis.Williford@areva.com]  
**Sent:** Wednesday, September 28, 2011 4:48 PM  
**To:** Tesfaye, Getachew  
**Cc:** BENNETT Kathy (AREVA); DELANO Karen (AREVA); ROMINE Judy (AREVA); RYAN Tom (AREVA); KOWALSKI David (AREVA)  
**Subject:** Response to U.S. EPR Design Certification Application RAI No. 504 (5982), FSAR Ch. 3  
**Attachments:** RAI 504 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 504 Response US EPR DC," provides a schedule since a technically correct and complete response to the question cannot be provided at this time.

The following table indicates the respective pages in the response document, "RAI 504 Response US EPR DC.pdf," that contain AREVA NP's response to the subject question.

Question #	Start Page	End Page
RAI 504 — 03.02.02-14	2	3

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

Question #	Response Date
RAI 504 — 03.02.02-14	November 22, 2011

Sincerely,

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

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**From:** Tesfaye, Getachew [<mailto:Getachew.Tesfaye@nrc.gov>]  
**Sent:** Tuesday, August 30, 2011 2:59 PM  
**To:** ZZ-DL-A-USEPR-DL  
**Cc:** McNally, Richard; Dixon-Herrity, Jennifer; Miernicki, Michael; Clark, Phyllis; Colaccino, Joseph; ArevaEPRDCPEm Resource  
**Subject:** U.S. EPR Design Certification Application RAI No. 504 (5982), FSAR Ch. 3

Attached please find the subject requests for additional information (RAI). A draft of the RAI was provided to you on August 12, 2011, and discussed with your staff on August 30, 2011. No change is made to the draft RAI as a result of this discussion. 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:** 3434

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**Subject:** Response to U.S. EPR Design Certification Application RAI No. 504 (5982),  
FSAR Ch. 3  
**Sent Date:** 9/28/2011 4:48:28 PM  
**Received Date:** 9/28/2011 4:48:55 PM  
**From:** WILLIFORD Dennis (AREVA)

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

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Files	Size	Date & Time
MESSAGE	2114	9/28/2011 4:48:55 PM
RAI 504 Response US EPR DC.pdf		61879

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

**Response to**  
**Request for Additional Information No. 504 (5982), Revision 0**

**8/30/2011**

**U.S. EPR Standard Design Certification**  
**AREVA NP Inc.**  
**Docket No. 52-020**  
**SRP Section: 03.02.02 - System Quality Group Classification**  
**Application Section: 3.2.2**

**QUESTIONS for Engineering Mechanics Branch 2 (ESBWR/ABWR Projects)**  
**(EMB2)**

**Question 03.02.02-14:****OPEN ITEM**

FSAR Table 3.2.2-1 Revision 2 adds the RPV Refueling Cavity Seal and classifies this component as non-safety-related Safety Class NS-AQ, Quality Group (QG) D and Seismic Category I. The response from AREVA to RAI 337, Question 09.01.04-14 changes the name of the seal to “ring” and revises the classification from QG D to N/A. The response also clarifies that the cavity ring is a mechanical component designed in accordance with ASME Section III, Subsection ND and quality group does not apply to the cavity ring since it is not a pressure-retaining component. The seismic classification as Seismic Category I with QA to 10 CFR 50 Appendix B is consistent with a safety-related SSC and RG 1.29 and RG 1.13. However, the QG classification for a non-safety-related mechanical component appears to be inconsistent with RG 1.26, the seismic Category I classification and the ASME Code Class such that additional information is needed regarding the basis for the QG classification.

- I. Explain why the refueling cavity seal/ring is not considered a structural or pressure-retaining component and describe the extent that codes and standards are applied.
- II. Explain the specific function of the cavity seal/ring, such as precluding leakage of radioactive fluids and the differential design pressure it can withstand.
- III. If the ring serves the same purpose as the pool liner structure and is not considered pressure-retaining, explain why this item is not considered a structural component.
- IV. Specifically describe the extent of certification and stamping and explain why this component is classified as QG N/A rather than QG C. A component designed to ASME Section III Subsection ND is normally designated as QG C.
- V. Mechanical components that contain radioactive materials are normally QG C or QG D. The basis for the classification as QG N/A and NS-AQ has not been justified. In particular the following information is needed to evaluate.
  - a. Establish if the cavity seal/ring is defined as safety-related or important to safety using the definitions in 10 CFR 50 and Appendix A and clarify if the seal is on the QA list required by 10 CFR 50.34 and 10 CFR 50 Appendix B.
  - b. Describe the specific safety function and the basis for the designation as safety-related, important to safety or non-safety-related.
  - c. Clarify if the ring/seal contains radioactive fluids and if this QG classification as N/A is an exception to RG 1.26 and, if so, include the technical justification in the DCD.
  - d. Since the seal/ring is classified as Seismic Category I with an Appendix B QA Program that is normally used for safety-related SSCs, explain why the seal/ring classified as QG N/A is not also considered safety-related.
  - e. If the seal/ring is considered safety-related, the basis for the classification as QG N/A should be described.

- f. If the seal/ring is defined as non-safety-related, but is important to safety concerning the risk to health and safety of the public, describe the evaluation of risk-significance.
- g. If the seal/ring is considered non-safety-related, explain why this is a nonessential component and clarify if this is an exception to SRP 9.1.2 or 9.1.3.

**Response to Question 03.02.02-14:**

A response to this question will be provided by November 22, 2011.