PMComanchePeakPEm Resource

From: Monarque, Stephen
Sent: Thursday, November 10, 2011 2:54 PM
To: John.Conly@luminant.com; Donald.Woodlan@luminant.com; 'cp34-rai-luminant@mnes-us.com'; Eric.Evans@luminant.com; joseph tapia; 'Kazuya Hayashi'; Matthew.Weeks@luminant.com; 'Russ Bywater'; MNES RAI mailbox (cp34-rai-luminant@mnes-us.com)
Cc: ComanchePeakCOL Resource; Galvin, Dennis
Subject: Comanche Peak RCOL Chapter 3 - Section 3.11 - RAI Number 239
Attachments: RAI 6159 (RAI 239).docx

The NRC staff has identified that additional information is needed to continue its review of the combined license application. The NRC staff's request for additional information (RAI) is contained in the attachment. Luminant is requested to inform the NRC staff if a conference call is needed.

The response to this RAI is due within 35 calendar days of **November 10, 2011.**

Note: The NRC staff requests that the RAI response include any proposed changes to the FSAR.

thanks,

Stephen Monarque
U. S. Nuclear Regulatory Commission
NRO/DNRL/NMIP
301-415-1544

Hearing Identifier: ComanchePeak_COL_Public
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Request for Additional Information (RAI) No. 6159, COLA Revision 2

RAI Letter Number 239

11/10/2011

Comanche Peak Units 3 and 4
Luminant Generation Company, LLC.
Docket No. 52-034 and 52-035
SRP Section: 03.11 - Environmental Qualification of Mechanical and Electrical Equipment
Application Section: 3.11

QUESTIONS for Component Integrity, Performance, and Testing Branch 1 (AP1000/EPR Projects) (CIB1)

03.11-18

This is a follow-up to RAI 73-2765, Question 3.11-1.

Comanche Peak FSAR Section 3.11 incorporates by reference the provisions in the US-APWR DCD for the design process for the environmental qualification (EQ) of mechanical equipment at Comanche Peak Units 3 and 4. In RAI 03.11-1, the NRC staff requested that the Comanche Peak COL applicant describe the implementation of the design process specified in the US-APWR DCD. The staff also requested that the COL applicant state when design and procurement specifications would be available onsite for NRC review. In its response to RAI 03.11-1, the Comanche Peak COL applicant stated that the implementation of the US-APWR design process for the EQ of mechanical equipment, including the application of ASME Standard QME-1-2007, "Qualification of Active Mechanical Equipment Used in Nuclear Power Plants," is described in MUAP-08015, Revision 1, "US-APWR Equipment Environmental Qualification Program." The applicant stated that the design and procurement specifications, including the EQ requirements for mechanical equipment, will be developed and available on-site during the detailed design and procurement stages prior to equipment procurement. As required in 10 CFR 52.79(a)(11), the COL application must provide a description of the programs and their implementation, necessary to ensure that the systems and components meet the requirements of the ASME *Boiler and Pressure Vessel Code* and the ASME *Code for Operation and Maintenance of Nuclear Power Plants* in accordance with 10 CFR 50.55a. The NRC staff requests that the Comanche Peak COL applicant provide a schedule for the availability of a sample of EQ specifications for mechanical equipment to be used at Comanche Peak Units 3 and 4 for audit by the NRC staff in support of its review of the Comanche Peak COL application.

03.11-19

This is a follow-up to RAI 73-2765, Question 3.11-2.

Comanche Peak FSAR Section 3.11 incorporates by reference the provisions in the US-APWR DCD in describing the operational program for environmental qualification of mechanical equipment at Comanche Peak. In RAI 03.11-2, the NRC staff requested that the Comanche Peak COL applicant fully describe the operational program for environmental qualification of mechanical equipment per the guidance in Commission paper SECY-05-0197 and RG 1.206. In its response to RAI 03.11-2, the Comanche Peak COL applicant stated that the US-APWR EQ program and its interface with the Operational Equipment Qualification Program are described in MUAP-08015. As a supplement to RAI 03.11-2, the NRC staff requests that the Comanche Peak COL applicant describe the transition from the initial EQ program to the EQ program to be implemented during plant operation. In particular, the NRC staff requests that the applicant specify where the following aspects of an acceptable description of the EQ operational program are provided in its FSAR:

(1) A provision that the documentation necessary to support the continued qualification of the equipment installed in the plant that is within the EQ Program scope will be available in accordance with 10 CFR 50, Appendix A.

(2) A description of the EQ Master Equipment List (EQMEL) that identifies the electrical and mechanical equipment that must be environmentally qualified for use in a harsh environment.

(3) A description of the control of revisions to the EQ files and EQMEL.

(4) Provisions that the operational aspect of the EQ Program will include:

a. evaluation of EQ results for design life to establish activities to support continued EQ;

b. determination of surveillance and preventive maintenance activities based on EQ results;

c. consideration of EQ maintenance recommendations from equipment vendors;

d. evaluation of operating experience in developing surveillance and preventive maintenance activities for specific equipment;

e. development of plant procedures that specify individual equipment identification, appropriate references, installation requirements, surveillance and maintenance requirements, post-maintenance testing requirements, condition monitoring requirements, replacement part identification, and applicable design changes and modifications;

f. development of plant procedures for reviewing equipment performance and EQ operational activities, and for trending the results to incorporate lessons learned through appropriate modifications to the EQ operational program; and

g. development of plant procedures for the control and maintenance of EQ records.

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03.11-20

This is a follow-up to RAI 73-2765, Question 3.11-11.

Part 10, “ITAAC and Proposed License Conditions,” of the Comanche Peak COL application states that the implementation of operational programs identified in Table 13.4-201 by the milestones indicated in the table is a potential license condition. The applicant states that some of these programs may be adequately controlled by other methods such as the regulations, the technical specifications, or a commitment tracking system, and will not need to be addressed in a license condition. The guidance in RG 1.206, Section C.IV.4.3 states that the COL should contain a license condition for the licensee to submit to the NRC a schedule, 12 months after issuance of the COL that supports planning for and conduct of NRC inspections of operational programs. RG 1.206 also states that the license condition should specify that the schedule will be updated every 6 months until 12 months before scheduled fuel loading, and every month thereafter until either the operational programs in the applicable FSAR table have been fully implemented or the plant has been placed in commercial service, whichever comes first. In RAI 03.11-11, the NRC staff requested that the Comanche Peak COL applicant discuss the plans to develop license conditions for operational program implementation consistent with the guidance in RG 1.206 and Commission paper SECY-05-0197. In its response to RAI 03.11-11, the Comanche Peak COL applicant stated that a proposed license condition to address operational programs is provided in Part 10 of the COL application. The proposed license condition in the RAI response stated that the licensee shall implement the programs or portions of programs identified in the table in Part 10 of the Comanche Peak FSAR (such as the EQ program) on or before the associated milestones (prior to initial fuel load for the EQ program). As a supplement to RAI 03.11-11, the NRC staff requests that the Comanche Peak COL applicant describe its plans to address operational program implementation consistent with RG 1.206 and Commission paper SECY-05-0197.