

ArevaEPRDCPEm Resource

From: WILLIFORD Dennis (AREVA) [Dennis.Williford@areva.com]
Sent: Wednesday, February 29, 2012 5:26 PM
To: Tesfaye, Getachew
Cc: BENNETT Kathy (AREVA); DELANO Karen (AREVA); ROMINE Judy (AREVA); RYAN Tom (AREVA)
Subject: Response to U.S. EPR Design Certification Application RAI No. 539 (6259), FSAR Ch. 12
Attachments: RAI 539 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 539 Response US EPR DC.pdf," provides a schedule since a technically correct and complete response to the one question cannot be provided at this time.

The following table indicates the respective pages in the response document, "RAI 539 Response US EPR DC.pdf," that contain AREVA NP's response to the subject question.

Question #	Start Page	End Page
RAI 539 — 12.03-12.04-29	2	3

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

Question #	Response Date
RAI 539 — 12.03-12.04-29	August 30, 2013

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, January 31, 2012 9:53 AM
To: ZZ-DL-A-USEPR-DL
Cc: Stutzcage, Edward; Bernal-Taylor, Sara; Schaaf, Robert; Clark, Phyllis; Segala, John; ArevaEPRDCPEm Resource
Subject: U.S. EPR Design Certification Application RAI No. 539 (6259), FSAR Ch. 12

Attached please find the subject request for additional information (RAI). A draft of the RAI was provided to you on December 9, 2012, and on January 31, 2012, 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/LB1
(301) 415-3361

Hearing Identifier: AREVA_EPR_DC_RAIs
Email Number: 3798

Mail Envelope Properties (2FBE1051AEB2E748A0F98DF9EEE5A5D4B2AE17)

Subject: Response to U.S. EPR Design Certification Application RAI No. 539 (6259),
FSAR Ch. 12
Sent Date: 2/29/2012 5:26:00 PM
Received Date: 2/29/2012 5:25:59 PM
From: WILLIFORD Dennis (AREVA)

Created By: Dennis.Williford@areva.com

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Files	Size	Date & Time
MESSAGE	2154	2/29/2012 5:25:59 PM
RAI 539 Response US EPR DC.pdf		454282

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

Response to

Request for Additional Information No. 539(6259), Revision 0

1/31/2012

U. S. EPR Standard Design Certification

AREVA NP Inc.

Docket No. 52-020

SRP Section: 12.03-12.04 - Radiation Protection Design Features

Application Section: 12.3

QUESTIONS for Health Physics Branch (CHPB)

Question 12.03-12.04-29:**OPEN ITEM****Follow-up RAI 459, Question 12.3-12.4-25**

- a) In the response to RAI 459 Question 12.3-12.4-25 the applicant described the changes in radiation zones between revision 0 and revision 1 of the FSAR and said that these changes were made in accordance with the revised minimum wall thicknesses appearing in the dimension boxes of the walls. However, in some cases the revised wall thicknesses were less than the previous (rev 0) wall thicknesses and the radiation zones also decreased (from a zone 5 to a zone 3 for example). Provide additional detail on why a reduction in minimum wall thicknesses would result in a lower radiation zone. This is the case for bullets 12, 22, 24, 28, 29, 30, 33, 34, 41, and 42 under item (d).

In the 14th bullet under item (d) the applicant states that the radiation zone designation in UFA15 096 was changed from zone 7 (red) to zone 4 (yellow) in accordance with the revised minimum wall thicknesses appearing in the dimension boxes of the walls. UFA15 096 is the access to transfer pit room in the fuel building. This room is also adjacent to the volume control tank room. During fuel transfer dose rates inside this room have been calculated by the staff (using FSAR revision 1 wall thicknesses) to reach 300 mrem/hr with the VCT contributing approximately 5 mrem/hr in addition to that. Provide additional detail on the basis for changing this room from a zone 7 to a zone 4, or revise the FSAR so that UFA15096 has the correct radiation zone shown.

- b) The Table 12.3-14 shown in the FSAR mark up in the response to Question 12.3-12.4-25 gives a dose rate limit of 5 rem/hr 1 ft from the side of an unshielded waste drum. However, there are no limits to the number of waste drums which may be stored. Therefore the administrative limit for one drum will not ensure that the radiation zone outside of the room will be met. Revise this table so that the administrative limit is on the total number of waste drums stored in the listed rooms, or placed on a location outside of the waste drum storage room.
- c) NUREG-0800 and RG 1.206 state that the source terms provided in section 12.2 should be described in the manner needed for input in the shield design calculations, and therefore, be consistent with the criteria used in the Chapter 12 radiation zone maps. However, the Chapter 12 radiation zone maps have been adjusted, for some of these sources, to the administrative limits provided in Table 12.3-14. Compliance with the above guidance documents is not required, but applicants need to demonstrate how alternative methods used are acceptable. Some of the dose rate administrative limits provided in Table 12.3-14 are significantly lower than what they would be using the source terms provided in Section 12.2, and staff is concerned that some of the administrative limits may be difficult to achieve, and in achieving them, may have additional effects on the plant that may not have been accounted for in the FSAR. For example, staff believes that the only reasonable method of decreasing the dose rate from many of these components is to increase resin use, boric acid use (for reducing the dose rate to the evaporator), and waste generation rates. Yet, the applicant

provides no change to the dose estimates for waste processing (Table 12.3-10), the 7.5 year drum storage capacity for class B and C waste described in section 11.4, or other FSAR changes that may result from meeting the administrative limits. Please, update the FSAR to include all modifications necessary to meet these administrative dose rate limits, or describe how these administrative limits will be met without making FSAR changes.

- d) Finally, Table 12.3-14 states that the dose rate at one foot from a reactor coolant pump will be administratively limited, however staff is unsure how this can be accomplished. Please, explain how the dose rate from a reactor coolant pump will be administratively limited.

Response to Question 12.03-12.04-29:

A response to this question will be provided by August 30, 2013.