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10 CFR 50.4 10 CFR 52.79

June 8, 2012

UN#12-046

ATTN: Document Control Desk U.S. Nuclear Regulatory Commission Washington, DC 20555-0001

Subject:

UniStar Nuclear Energy, NRC Docket No. 52-016

Response to Request for Additional Information for the

Calvert Cliffs Nuclear Power Plant, Unit 3.

RAI 341, Operational Programs

Reference:

1) Surinder Arora (NRC) to Paul Infanger (UniStar Nuclear Energy), "CCNPP3

- Final RAI 341 CIB1 6451," dated May 9, 2012

The purpose of this letter is to respond to the request for additional information (RAI) identified in the NRC e-mail correspondence to UniStar Nuclear Energy, dated May 9, 2012 (Reference 1). This RAI addresses Operational Programs as discussed in Section 13.4 of the Final Safety Analysis Report (FSAR), as submitted in the Calvert Cliffs Nuclear Power Plant (CCNPP) Unit 3 Combined License Application (COLA), Revision 8.

Enclosure 1 provides our response to RAI No. 341, Question 13.04-1, and includes revised COLA content. A Licensing Basis Document Change Request has been initiated to incorporate these changes into a future revision of the COLA.

This response to RAI No. 341, Question 13.04-1 includes a change to the "Inservice Testing Program" line of COLA FSAR Table 13.4-1. No previous RAI responses have involved a change to this line in Table 13.4-1. Enclosure 2 provides a table of changes to the CCNPP Unit 3 COLA associated with this RAI response.



Our response does not include any new regulatory commitments. This letter does not contain any sensitive or proprietary information.

If there are any questions regarding this transmittal, please contact me at (410) 369-1907 or Mr. Wayne A. Massie at (410) 369-1910.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 8, 2012

Mark T. Finley

Enclosures:

- 1) Response to NRC Request for Additional Information RAI No. 341, Question 13.04-1, Operational Programs, Calvert Cliffs Nuclear Power Plant, Unit 3
- 2) Table of Changes to CCNPP Unit 3 COLA Associated with Response to RAI No. 341, Calvert Cliffs Nuclear Power Plant, Unit 3
- cc: Surinder Arora, NRC Project Manager, U.S. EPR Projects Branch
 Laura Quinn-Willingham, NRC Environmental Project Manager, U.S. EPR COL Application
 Getachew Tesfaye, NRC Project Manager, U.S. EPR DC Application, (w/o enclosures)
 Patricia Holahan, Acting Deputy Regional Administrator, NRC Region II, (w/o enclosures)
 Silas Kennedy, U.S. NRC Resident Inspector, CCNPP, Units 1 and 2,
 David Lew, Deputy Regional Administrator, NRC Region I (w/o enclosures)

Enclosure 1

Response to NRC Request for Additional Information RAI No. 341, Question 13.04-1, Operational Programs, Calvert Cliffs Nuclear Power Plant, Unit 3 Enclosure 1 UN#12-046 Page 2 of 3

RAI No. 341

NRC Question 13.04-1

Calvert Cliffs Unit 3 COL FSAR Table 13.4-1, "Operational Programs Required by NRC Regulations and Program Implementation," indicates that the inservice testing (IST) program will be implemented after the generator is online on nuclear heat as required by 10 CFR 50.55a(f) and the ASME OM Code. Consistent with other COL applications, the NRC staff requests that the Calvert Cliffs Unit 3 COL applicant include a note in FSAR Table 13.4-1 for the milestone of full implementation of the IST program after generator online on nuclear heat specifying that appropriate portions of the IST program will be implemented as necessary to support the system operability requirements of the technical specifications.

Response

CCNPP Unit 3 COLA FSAR Table 13.4-1, "Operational Programs Required by NRC Regulations and Program Implementation," is being revised to include a note (Note 3) for the milestone of full implementation of the inservice testing (IST) program after generator online on nuclear heat, specifying that appropriate portions of the IST program will be implemented as necessary to support the system operability requirements of the technical specifications.

Note 3 is added to the "Inservice Testing Program" line of COLA FSAR Table 13.4-1 to be consistent with other Combined License (COL) applications.

COLA Impact

FSAR Table 13.4-1 is being updated as follows:

Table 13.4-1—{Operational Programs Required by NRC Regulations and Program Implementation}

Item	Program Title	Source (Required By)	FSAR Section	Implementation Milestones	Requirements
1	In-service Inspection Program	10 CFR 50.55a(g)	5.2.4 6.6 5.4.2.5 Note 1	Prior to commercial service	10 CFR 50.55a(g) ASME XI IWA 2430(b)
2	In-serviceInservice Testing Program	10 CFR 50.55a(f); 10 CFR Part 50, App. A	3.9.6 5.2.4 Note 1 Note 3	After generator online on nuclear heat	10 CFR 50.55a(f) ASME OM Code
3	Environmental Qualification Program	10 CFR 50.49(a)	3.11 Note 1	Prior to initial fuel load	License Condition
•••					
21	Special Nuclear Material (SNM) Material Control and Accounting System	10 CFR 74.11; 10 CFR 74.13; 10 CFR 74.15; 10 CFR 74.17; 10 CFR 74.19; 10 CFR 74.31	13.5.2.2.10	Prior to initial receipt of fuel	License Condition

Note 1 The corresponding U.S. EPR FSAR sections are incorporated by reference and include additional information regarding these programs. Note 2 The Quality Assurance Program Description covers all phases of the facility's life, including design, construction, and operation. Implementation of the Quality Assurance Program Description has occurred. As such, a schedule for delayed implementation, after COL issuance, of the Quality Assurance Program Description for the operational phase and the corresponding license condition are not required.

"Construction includes those activities authorized by the issued COL or Limited Work Authorization. This does not include site preparation activities such as clearing, grubbing, excavation, demolition of existing structures, etc.

Note 3 The Inservice Testing Program will be fully implemented by generator online on nuclear heat. Appropriate portions of the program are implemented as necessary to support the system operability requirements of the technical specifications.

Enclosure 2

Table of Changes to CCNPP Unit 3 COLA Associated with Response to RAI No. 341, Calvert Cliffs Nuclear Power Plant, Unit 3

Table of Changes to CCNPP Unit 3 COLA Associated with Response to RAI No. 341

Change ID#	Subsection	Type of Change	Description of Change				
Part 2 – FSAR							
CC3-12- 0116	Table 13.4-1	Incorporate COLA markups associated with the RAI 341 Question 13.04-1 response.	CCNPP Unit 3 COLA FSAR Table 13.4-1, "Operational Programs Required by NRC Regulations and Program Implementation," is being revised to include a note (Note 3) for the milestone of full implementation of the inservice testing (IST) program after generator online on nuclear heat, specifying that appropriate portions of the IST program will be implemented as necessary to support the system operability requirements of the technical specifications. Note 3 is added to the "Inservice Testing Program" line of COLA FSAR Table 13.4-1 to be consistent with other Combined License (COL) applications.				