

July 19, 2012

MEMORANDUM TO: Amy Snyder, Acting Branch Chief
Licensing Branch 2
Division of New Reactor Licensing
Office of New Reactors

FROM: Eileen McKenna, Branch Chief **/RA/**
Balance of Plant and Technical Specifications Branch
Division of Safety Systems and Risk Assessment
Office of New Reactors

SUBJECT: AUDIT PLAN TO REVIEW COMANCHE PEAK, REVISION 3
ISSUES FOR CHAPTER 9 (INCLUDING CALCULATIONS)

Attached is the audit plan to review selected balance of plant areas related to Comanche Peak Units 3 and 4 (US-APWR) (Docket No. 52-034 and 52-045) Combined License (COL) and Final Safety Analysis Report, Revision 3, Chapter 9, submitted to the U.S. Nuclear Regulatory Commission (NRC) application in June 28, 2012. After conducting a comprehensive review of the COL, Revisions 1, 2 and 3 the staff concluded that additional information is needed from the applicant to support the staff's safety evaluation. The purpose of this audit is to review additional Luminant Generation Company LLC (Luminant) documents that contain information not currently in the COL that are related to the essential service water (Section 9.2.1) and ultimate heat sink (9.2.5).

Enclosure: As Stated

CONTACT: Larry Wheeler, DSRABPTS
(301) 415-1278

**AUDIT PLAN
TO REVIEW SELECTED AREAS RELATED TO
COMANCHE PEAK UNITS 3 AND 4
CHAPTER 9 and CALCULATIONS**

APPLICANT: Luminant Generation Company LLC

APPLICANT CONTACT:

TIME: August 29 and 30, 2012

LOCATION: 1001 19th Street North, Arlington, VA

TECHNICAL REVIEWERS: Larry Wheeler (NRO, Audit Team Leader)
Tarico Sweat (NRO – reviewer)

PROJECT MANAGERS Stephen Monarque
Paul Kallan

ENCLOSURE

A. Background

The staff will be conducting an audit of the Comanche Peak Units 3 and 4 COL, Revision 3, Chapter 9 focusing on balance of plant sections. The systems to be included within the scope of this audit include the essential service water (Section 9.2.1) and ultimate heat sink (Section 9.2.5).

The purpose of this audit is to review additional documents, including calculations, provided by LLC which pertain to the COL and applicable Standard Review Plan (SRP) sections as requested in requests for additional information (RAIs) outlined in Table 2. The staff will focus on reviewing the calculation methodologies, assumptions, and results used to reach conclusions for these RAIs. This will enable the staff to gain a better understanding of the detailed calculations, analyses and/or bases underlying the formal application and confirm the staffs understanding of the application.

To achieve the review goals in an efficient manner, the staff assembled an interdisciplinary audit team consisting of professionals with expertise in all the various systems to be reviewed. The audit team will include staff from the NRC. To facilitate and expedite the work, it is foreseen that the audit will be attended by representatives from LLC who will also introduce the documents available for the staff to review and indicate documents which are classified as proprietary along with the supporting documents and technical evidence to the reviewers. The staff will document the audit findings in an audit report that may result in new supplemental RAIs.

B. Regulatory Audit Bases

The bases for the audit include all documents in Table 2 below, Comanche Peak Units 3 and 4 COL (Revision 3), and all supporting calculations used to ensure compliance with the General Design Criteria (GDC) outlined in the applicable SRP.

C. Regulatory Audit Scope or Methodology

The areas of focus for the audit are the calculation methodologies, assumptions, and results used to reach conclusions for various previously submitted RAIs. The subjects of these RAIs are listed in Table 2.

D. Information and Other Material Necessary for the Regulatory Audit

Copies of the COL, Revision 3 should be available as reference materials to the audit members. All calculations, as defined in Table 2, used to develop responses for RAIs should be provided along with knowledgeable personnel to explain any questions the staff may have about the calculations. Finally, previous LLC RAI responses to related systems should be available as well as other related design documents as requested.

E. Team Assignments

The team leader will be responsible for conducting the audit. Other team member/contractors will assist as required.

F. Logistics

The NRC staff will conduct the review over a period of two business days. Any remaining items not discussed at the end of the 2nd day will be deferred for future NRC/LLC audits.

Following the audit, each technical reviewer will prepare a separate audit report with specific findings and proposed supplemental RAIs and will send the report to the team leader two weeks from the audit date. The team leader will assemble and prepare a final audit report. This final audit report will contain a section that lists all supplemental RAIs. The final report will be made available to all contributors for their concurrence before issuance.

An agenda for the audit is presented in Table 1 and the specific audit areas supporting technical documentation are identified in Table 2.

If necessary, any circumstances related to the conductance of the audit will be communicated to Paul Kallan (NRC Project Manager) at 301-415-2809 (paul.kallan@nrc.gov).

G. Special Requests

NRC staff will take lunch outside the audit offices.

H. Deliverables

At the conclusion of the audit, the staff will generate an audit report which will summarize the questions and LLC's response and will note any flowing-up actions such as supplement RAI responses. This report will be made available to the NRC project manager within 30 days of the completion of this audit.

I. References

NRC/NRO Office Instruction, NRO-REG-108, Revision 0, Regulatory Audits (ML081910260)

Table 1: Audit Agenda

Date	Time	Item	Responsible
	9:00 am – 9:30 pm	Opening remarks, presentation of participants, organizational questions	NRC and DSRA BPTS Branch Chief
	9:30 am – 12:00 pm	Audit of calculations	LLC
	12:00 pm – 1:00 pm	Lunch Break	
	1:00 pm – 4:00 pm	Audit of calculations	LLC
	9:00 am – 12:00 pm	Audit of calculations	LLC
	12:00 pm – 1:00 pm	Lunch Break	
	1:00 pm – 3:30 pm	Audit of calculations	LLC
	3:30 pm – 4:00 pm	Audit Summary (Exit)	NRC Staff

Table 2: Audit Items

System	Calculations ##
Essential Service Water (9.2.1)	<ul style="list-style-type: none"> • ESW pump NPSH • ESW pump vortex • ESW pump head • ESW flow velocities • ESW uncontrolled blowdown • ESW water hammer analysis • Fire protection supply from ESW <p>Note: ESW-AOV-577 which has 4 power supplies is still an open item between MHI and the COLs. NRC may wish to discussion this and engage MHI during the audit, as time permits.</p> <p>RAIs 3698, 6348, and (6344 - US-APWR DC)</p> <p>Note: There maybe some overlap between the DC and COL calculations.</p>
Ultimate Heat Sink (9.2.5)	<ul style="list-style-type: none"> • Cooling Tower Basin Volume and water levels, accounting for sedimentation – 30 day requirement • Cooling Tower calculations (including wet-bulb determination, evaporation and drift rates) • Heat transfer (cooling capacity and cooling rates in accordance with 350 °F to 200 °F within 36 hours) • UHS transfer pumps, NPSH, vortex, head, flow velocities <p>RAIs 3762, 6173, and 6358</p>

Minimum calculations to be reviewed by the staff

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Distribution:

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ADAMS ACCESSION NUMBER: ML12201A320

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DATE	7/19/2012	7/19/2012	7/19/2012

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