

September 5, 2012

MEMORANDUM TO: John Segala, Chief  
Licensing Branch 1  
Division of New Reactor Licensing  
Office of New Reactors

FROM: David H. Jaffe, Senior Project Manager /RA/  
Licensing Branch 1  
Division of New Reactor Licensing  
Office of New Reactors

SUBJECT: SUMMARY OF THE JULY 26, 2012, PUBLIC MEETING WITH  
AREVA NP, INC., TO DISCUSS ISSUES RELATED TO INSPECTIONS,  
TESTS, ANALYSIS AND ACCEPTANCE CRITERIA REQUEST FOR  
ADDITIONAL INFORMATION 469

On July 26, 2012, the U.S. Nuclear Regulatory Commission (NRC) held a public meeting with representatives of AREVA held at the One White Flint North Building, 11555 Rockville Pike, Room O-14B08, Rockville, MD. The purpose of this public meeting was to discuss issues related to the staff's review of the U.S. EPR (EPR) Design Certification Application, specifically the staff's inspectability concern detailed in Request for Additional Information (RAI) 469. The meeting agenda is provided as Enclosure 1 and the meeting attendance list is provided as Enclosure 2. Presentation material distributed at the meeting is available through the Agencywide Documents Access and Management System (ADAMS) and consists of the following documents (presentation slides): "AREVA Presentation Slides from Public Meeting to Discuss Issues Related to U. S. EPR Inspections, Tests, Analyses and Acceptance Criteria (ITAAC) and RAI 469", (ADAMS Accession No. ML12216A397) and "ITAAC Inspectability EPR RAI 469 [the NRC staff presentation]," (ADAMS Accession No. ML122130874). Documents in ADAMS are available electronically at the NRC Electronic Reading Room at <http://www.nrc.gov/reading-rm/adams.html>. If you do not have access to ADAMS or have problems accessing the documents located in ADAMS, contact the NRC Public Document Room (PDR) staff at 1-800-397-4209, 301-415-4737, or [pdr@nrc.gov](mailto:pdr@nrc.gov).

The meeting was a Category 1 public meeting and lasted from approximately 9:30 a.m. to 4:00 p.m.

In opening comments, the NRC staff indicated that during the current meeting, the staff intended to provide comments on issues related to the inspectability of Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) ; other issues of a more subject-specific nature (technical issues) would be deferred. With regard to AREVA's response to RAI 469, the response should be maintained as a draft to assist in the preparation of Revision 4 to the EPR Final Safety Analysis Report (FSAR).

AREVA made the first presentation of the meeting reviewed the issues associated with RAI 469 and presented their proposed strategy for resolution. AREVA proposed dividing the EPR ITAAC into subject groups (e.g., buildings, arrangement, mechanical, etc.) and then developing a model typical of that group. Once the model for a particular group has the agreed upon wording, the associated ITAAC in that group can be suitably revised. Non-Model (case-specific) ITAAC are also developed. The purpose of the current meeting is to develop the agreed upon wording for the model and non-model ITAAC. AREVA presented a timeline for resolution of RAI 469 starting with the current meeting and ending with issuance of the final response in August 2013.

The NRC staff noted in its presentation that the staff was experiencing difficulty in reviewing the RAI 469 drafts since it appeared that the EPR ITAAC were evolving for a number of reasons. The NRC staff recommended that AREVA consider the use of Regulatory Issue Summary (RIS) 2008-05, "Lessons Learned to Improve ITAAC submittals," Revision 1, September 23, 2010, in the development of the EPR ITAAC. In addition attendance at the Construction Inspection Program meetings, and other public meetings would be helpful. The NRC staff provided general comments on the following categories of EPR ITAAC:

- American Society of Mechanical Engineers (ASME) Code
- Motor-Operated Valve
- Severe Accident

The NRC staff also provided general comments on the follow categories of systematic problems with EPR ITAAC:

- Use of the definition of "as-built"
- Functional Arrangement
- Lower-Tier referencing
- ITAAC Mismatch and Record Review
- Numbering
- Specificity
- Generic Inspectability

The NRC staff encouraged AREVA to use existing NRC staff and industry guidance on ITAAC inspectability and to attend public meetings conducted by the NRC staff that address development of ITAAC, inspectability and elimination of ambiguities.

In the afternoon meeting session, the NRC staff and AREVA discussed the EPR model and non-model ITAAC; the NRC staff provided specific comments where needed.

At the conclusion of the meeting, AREVA suggested that they would try to provide the NRC staff with a "mark-up" of the model and non-model ITAAC in sufficient time to allow review prior to the NRC staff/AREVA public meeting on Tier 2 Star on August 29, 2012. The remaining issues associated with the RAI 469 response could be discussed during the August 29, 2012 meeting, if needed.

J. Segala

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One member of the public was in attendance via a telephone conference line (see the attendance list); there were no comments from this member of the public. Please direct any inquiries concerning this meeting to David H. Jaffe who can be contacted by email at [David.Jaffe@nrc.gov](mailto:David.Jaffe@nrc.gov) or telephone at 301-415-1439.

Docket No.: 52-020

Enclosures:

1. Meeting Agenda
2. Attendee List

cc w/encl: See next page

J. Segala

-2-

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Docket No.: 52-020

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1. Meeting Agenda
2. Attendee List

cc w/encl: See next page

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<b>NAME</b>	DJaffe	JMcLellan	MKowal	GTesfaye
<b>DATE</b>	08/27/2012	08/27/2012	08/29/2012	09/05/2012

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**MEETING AGENDA FOR July 26, 2012**

**PUBLIC MEETING WITH AREVA**

**RAI 469**

One White Flint North Building, 11555 Rockville Pike, Room O-14B08  
Rockville, MD 20852

<b><u>TIME</u></b>	<b><u>TOPIC</u></b>	<b><u>LEAD</u></b>
9:30 A.M.	Introduction and Opening Remarks	NRC/AREVA
9:45 A.M.	AREVA Presentation on RAI 469	AREVA
11:30 A.M.*	NRC Staff Presentation on RAI 469	NRC
12:30 P.M.	Break	
1:00 P.M.	Review of EPR Model and Non-model ITAAC	NRC/AREVA
4:00 P.M.	Conclusions	NRC/AREVA
4:15 P.M.	Adjourn	

Note - All times listed are approximate.

\* The meeting was interrupted for an unannounced emergency evacuation drill

**MEETING ATTENDANCE FOR JULY 26, 2012**

**RAI 469 PUBLIC MEETING**

	<u>Name</u>	<u>Company/Organization</u>	<u>Contact Info</u>
1	David Jaffe	NRC	david.jaffe@nrc.gov
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7	Tony Lentz	AREVA	
8	John Cashman	Unistar	
9	John Volkoff	Unistar	
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14	Mark Kowal	NRC	Mark.Kowal@nrc.gov
15	Brian Vance	AREVA	
16	Ed Kleeh	NRC	Edmund.Kleeh@nrc.gov
17	Ian Cozens	NRC	Ian.Cozens@nrc.gov
18	Anne-Marie Grady	NRC	Anne-Marie.Grady@nrc.gov
19	Bob Plappert	Hukari Ascendent <sup>2</sup>	RobertP@hukarari.com

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<sup>2</sup> Attended via telephone conference line

DCWG - EPR Mailing List

(Revised 01/26/2012)

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