

ArevaEPRDCPEm Resource

From: Snyder, Amy
Sent: Tuesday, November 27, 2012 10:05 AM
To: 'WILLIFORD Dennis (AREVA)'
Cc: Miernicki, Michael; 'WELLS Russell (AREVA)'; Clark, Phyllis; McKenna, Eileen; Li, Chang; Arora, Surinder
Subject: RE: RESCHEDULE: Discuss AREVA Draft Response RAI 218, Question 03.04.01-8

Dennis,

As requested, in preparation for next Tuesday's call on the subject draft RAI, here is more detail from the staff on AREVA's revised draft response to RAI 218, Question 03.04.01-8. I received this detailed feedback earlier, but somehow only passed on the fact that the staff felt that the response was unacceptable and requested a teleconference.

Technical staff (BPTS) has reviewed AREVA's revised response to RAI 547, Question 03.04.01-8. The initial response to the question led to the deletion of COL Item 3.4-5 and AREVA referenced the existing ITAAC to justify its deletion. Technical reviewed the referenced ITAAC wording in the initial response and found it unacceptable. Previously, BPTS and AREVA had a conference call to discuss the inadequacy of the ITAAC wording. In response, AREVA revised the response to RAI 547, Question 03.04.01-8 revising the wording in the ITAAC and relevant Tier 2 FSAR sections. Technical has found the revised wording unacceptable and would like to have another conference call to inform AREVA of the review finding and to discuss the path forward.

Detailed Background Information FYI

AREVA's revised response to RAI 547, Question 03.04.01-8, resulted from the proposed deletion of COL Item 3.4-5. AREVA revised the wording in the ITAAC and relevant Tier 1 and Tier 2 FSAR sections from "Essential equipment required for plant shutdown" to "Safety related equipment required for plant shutdown or to mitigate the consequences of an accident" as the SSCs being protected from internal flooding.

SRP Section 3.4.1 acceptance criteria indicate that SSCs important to safety are designed for flood protection. The safety-related equipment "required to mitigate the consequences of an accident" is not identified in the FSAR. Technical does not believe that the proposed wording is acceptable; because there may be safety-related SSCs not protected from internal flooding and that some have not been identified or reviewed. During the 2009 audit the applicant stated that the design had not reached the stage to identify those SSCs. The review is now in Phase 2 of RCOL SE and it appears that there has not been sufficient progress in the design to identify those SSCs below the flood level.

Please let me know if you have any questions.

Thank you.

Amy

Amy Snyder, U.S. EPR Design Certification Lead Project Manager
Licensing Branch 1 (LB1)
Division of New Reactor Licensing
Office of New Reactors
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
301-415-6822
amy.snyder@nrc.gov

From: WILLIFORD Dennis (AREVA) [mailto:Dennis.Williford@areva.com]
Sent: Monday, November 26, 2012 4:08 PM
To: Snyder, Amy
Cc: Miernicki, Michael; WELLS Russell (AREVA)
Subject: FW: RESCHEDULE: Discuss AREVA Draft Response RAI 218, Question 03.04.01-8

Amy,

Can you send the talking points/areas of specific concern on our revised draft response to RAI 218, Question 03.04.01-8 prior to our call next Tuesday so we can be prepared to discuss.

Thanks,

Dennis

Dennis Williford, P.E.
U.S. EPR Design Certification Licensing Manager
AREVA NP Inc.
7207 IBM Drive, Mail Code CLT 2B
Charlotte, NC 28262
Phone: 704-805-2223
Email: Dennis.Williford@areva.com

-----Original Appointment-----

From: Miernicki, Michael [mailto:Michael.Miernicki@nrc.gov]
Sent: Wednesday, November 21, 2012 9:18 AM
To: Miernicki, Michael; Li, Chang; McKenna, Eileen; RYAN Tom (RS/NB)
Cc: Snyder, Amy
Subject: RESCHEDULE: Discuss AREVA Draft Response RAI 218, Question 03.04.01-8
When: Tuesday, December 04, 2012 3:00 PM-4:00 PM (UTC-05:00) Eastern Time (US & Canada).
Where: T10-C22

When: Tuesday, December 04, 2012 3:00 PM-4:00 PM (GMT-05:00) Eastern Time (US & Canada).

Where: T10-C22

Note: The GMT offset above does not reflect daylight saving time adjustments.

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Bridgeline 877-795-4122, Passcode: 978857#

Mike Miernicki is the PM

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Attached is a DRAFT revised response for RAI 218 Question 03.04.01-8. This response was sent as Final in Supplement 2 on August 18, 2009. The purpose of this revision is as follows:

- To delete COL Information Item 3.4-5 in U.S. EPR FSAR Tier 2, Table 1.8-2 and U.S. EPR FSAR Tier 2, Section 3.4.1 since the information required by this COL information has been provided in revised U.S. EPR FSAR Tier 2, Section 3.4.3.3.
- U.S. EPR FSAR Tier 2, Section 3.4.3.3, and U.S. EPR FSAR Tier 2, Table 3D-1 were revised to provide the internal flood level for the RB as noted in this response.
- U.S. EPR FSAR Tier 1, Table 2.1.1-8, Item 2.10 will be revised to change “Essential equipment required for plant shutdown” to “Safety related equipment required for plant shutdown or to mitigate the consequences of an accident.” This revised terminology is consistent with the analyses in U.S. EPR FSAR Tier 2, Section 3.4.3.3, and the response to Question 03.04.01-9.a which was accepted by NRC in the Chapter 3 Group 1 SER.
- U.S. EPR FSAR Tier 1, Table 2.1.1-8, Item 2.10.a was deleted since the internal flooding analyses are fully described in U.S. EPR FSAR Tier 2, Section 3.4.1 and the list of the systems required for safe shutdown is provided in U.S. EPR FSAR Tier 2, Section 7.4.

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Sent Date: 11/27/2012 10:04:38 AM
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From: Snyder, Amy

Created By: Amy.Snyder@nrc.gov

Recipients:

"Miernicki, Michael" <Michael.Miernicki@nrc.gov>
Tracking Status: None
"WELLS Russell (AREVA)" <Russell.Wells@areva.com>
Tracking Status: None
"Clark, Phyllis" <Phyllis.Clark@nrc.gov>
Tracking Status: None
"McKenna, Eileen" <Eileen.McKenna@nrc.gov>
Tracking Status: None
"Li, Chang" <Chang.Li@nrc.gov>
Tracking Status: None
"Arora, Surinder" <Surinder.Arora@nrc.gov>
Tracking Status: None
"WILLIFORD Dennis (AREVA)" <Dennis.Williford@areva.com>
Tracking Status: None

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Options

Priority: Standard
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