

PMComanchePeakPEm Resource

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Sent: Tuesday, January 29, 2013 4:44 PM
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Cc: ComanchePeakCOL Resource; Reyes, Ruth
Subject: Comanche Peak RCOL Chapter 6 - RAI Number 272
Attachments: RAI_6997 (RAI 272).docx

The NRC staff has identified that additional information is needed to continue its review of the combined license application. The NRC staff's request for additional information (RAI) is contained in the attachment. Luminant is requested to inform the NRC staff if a conference call is needed.

The response to this RAI is due within 35 calendar days of **January 29, 2013**.

Note: The NRC staff requests that the RAI response include any proposed changes to the FSAR.

thanks,

Stephen Monarque
U. S. Nuclear Regulatory Commission
NRO/DNRL/NMIP
301-415-1544

Hearing Identifier: ComanchePeak_COL_Public
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Request for Additional Information 272 (6997)

Issue Date: 1/29/2013

Operating Company: Luminant Generation Company, LLC.

Docket No. 52-034 and 52-035

Review Section: 06.02.02 - Containment Heat Removal Systems

Application Section: 6.2

QUESTIONS

06.02.02-6

The NRC staff found inconsistent descriptions for three COL items, 6.2(5), 6.2(6), 6.2(8), between Chapter 1, Table 1.8-201 and Chapter 6.2, Subsection 6.2.8, "Combined License Information." Request applicant to address inconsistent language for STD COL item descriptions (to include FSAR location listed in Table 1.8-201).

Also the staff found an inconsistent FSAR Subsection reference: Table 6.2.2-R for STD COL 6.2(5) indicates that containment cleanliness is addressed in US-APWR Design Subsection 6.2.2.3 whereas CPNPP Section 6.2 indicates that STD COL item 6.2(5) is addressed in Subsection 6.2.2.3.2.

Note: It appears that these inconsistencies were introduced in an effort to incorporate future (interim) changes to USAPWRE DCD Revision 3, related to STD COL Item 6.2(5), that the DC applicant has already communicated to the NRC staff in DCD docketed correspondence, such as tracking reports or in DCD RAI responses. On this basis, the staff requests the COL applicant to clearly identify what additional docketed DCD correspondence (in addition to USAPWR DCD Revision 3) is being used to support the COL application regarding Section 6.2, "Containment Systems."

06.02.02-7

This is a follow-up question to RAI Letter Number 271-6965 Question 06.02.02-4.

NUREG-0800, Standard Review Plan (SRP) 6.2.2, 'Containment Heat Removal Systems,' and Regulatory Guide 1.82, 'Water Sources for Long-term Recirculation Cooling Following a Loss-of-Coolant Accident,' Revision 3, establish an acceptable approach with criteria that the NRC staff will use to evaluate whether an applicant meets applicable NRC's regulations.

Regulatory Guide 1.82, Revision 3, as modified and supplemented for pressurized water reactors by the Nuclear Energy Institute (NEI) Guidance Report (NEI 04-07 GR) and the associated NRC safety evaluation (SE) provide guidance for cleanliness programs and debris evaluations.

The Comanche Peak Nuclear Power Plant (CPNPP) COL Application Part 2, FSAR Revision 3, Sub-section 6.2.2.3.2, describes STD COL item 6.2(5) - containment cleanliness program. The COL application states that the program [containment cleanliness] includes the following:

- Guidance documents used to develop the cleanliness program survey/sampling methods including NEI 04-07 (Ref. 6.2-24) and associated NRC safety evaluation dated December 6, 2004.
- Inspection Frequency
- Evaluation Frequency

The staff seeks more specificity in these areas related to the containment cleanliness program. The staff requests that the applicant clearly state in the FSAR if the cleanliness program (to include the survey/sampling aspects) is to be implemented consistent with NEI 04-07 and the associated NRC safety evaluation. Areas of non-conformance with the guidance need to be identified and justified.

The staff requests that the applicant clearly state the inspection frequency for Latent debris, for example, inspections (to include survey/sampling) are conducted before initial startup and after refueling or maintenance outages, to provide reasonable assurance that the plant Latent debris design bases are met during plant operation.

The staff requests that the applicant clearly state when the sampling results will be evaluated (in relation to startup) and provide justification for the selected approach.

The FSAR documentation for Vogtle Electric Generating Plant, Units 3 & 4 related to containment cleanliness, and the staff's associated safety evaluation, provide a useful example of how to address the staff's information needs associated with a cleanliness program.