

ArevaEPRDCPEm Resource

From: WILLIFORD Dennis (AREVA) [Dennis.Williford@areva.com]
Sent: Wednesday, January 23, 2013 2:08 PM
To: Miernicki, Michael
Cc: Snyder, Amy; WELLS Russell (AREVA)
Subject: FW: Revised DRAFT Response to U.S. EPR Design Certification Application RAI No. 547 (6499, 6359), FSAR Ch. 3 - NEW PHASE 4 RAI, Question 03.06.01-14 - INFO
Attachments: FW: AREVA Draft Response to RAI 547, Question 03.06.01-14; Fw: RAI 547 Status.docx
Importance: High

Mike,

See highlighted responses to NRC comments provided below by Russ Wells. Please forward to the necessary NRC reviewers and we can setup a phone call to discuss further if required.

Thanks,
Dennis

Dennis Williford, P.E.
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From: Miernicki, Michael [<mailto:Michael.Miernicki@nrc.gov>]
Sent: Wednesday, January 23, 2013 12:48 PM
To: WILLIFORD Dennis (RS/NB)
Cc: Segala, John; Snyder, Amy; WELLS Russell (RS/NB)
Subject: RE: Revised DRAFT Response to U.S. EPR Design Certification Application RAI No. 547 (6499, 6359), FSAR Ch. 3 - NEW PHASE 4 RAI, Question 03.06.01-14 - INFO

Dennis, the staff has provided these additional comments on subject revised draft response:

- 1) For 10.2-3, a COL applicant cannot provide “applicable turbine disk rotor specimen test data, load-displacement data from compact tension specimens and the fracture toughness properties.” Deleting “after the site-specific turbine has been procured,” will likely not solve the issue. These data can only be obtained after the turbine has been procured. Instead, AREVA may wish to state, “A COL applicant that references the U.S. EPR design certification will **address its plans** for obtaining applicable turbine disk rotor specimen test data, load-displacement data from the compact tension specimens, and the fracture toughness properties after the site-specific turbine has been procured.”

[WELLS Russell D (AREVA NP INC)] Previously NRC told us the planned revision to this COL information item was acceptable in an email dated 10/15/2012 (see attached e-mail). This is a new comment that was not commented by NRC on the initial draft response. A COL applicant can theoretically provide this information, Whether it is provided in the FSAR or a license condition is established is the responsibility of the COL applicant. For example, AP1000 and APWR provided this information in their FSAR and they do not have a similar COL information item. Future U.S. EPR COLAs may also be able to provide this information based on data obtained information obtained from the RCOLA. Also the proposed wording of “address its plans” is very nebulous. The

COLA either has to provide this information in their information or establish a license condition to provide this information and provide a commitment as to when it will be provided. Therefore, AREVA believes the change we proposed to this COL information item (i.e., simply delete “after the site-specific turbine has been procured” is sufficient and makes it theoretically possible for the COLA to complete this COL information item). If NRC does not agree we would like to have a telecon with NRC on this as soon as possible).

- 2) Similarly, for 10.3-2, a COL applicant cannot develop and **implement** a FAC condition monitoring program that is consistent with Generic Letter 89-08 and NSAC-202L-R3. Deleting “prior to initial fuel loading” does not correct the issue. Instead, AREVA may wish to state, “A COL applicant that references the U.S. EPR design certification will **address its plans** for developing and implementing a FAC condition monitoring program that is consistent with Generic Letter 89-08 and NSAC-202L-R3 for the carbon steel portions of the steam and power conversion systems that contain water or wet steam prior to initial fuel loading.”

[WELLS Russell D (AREVA NP INC)] This change was provided in the revised draft response to RAI 547 based on a comment from NRC in an email dated 11/20/12 (attached) AREVA proposes that this COL information be revised consistent with the wording for similar COL items (e.g., 3.9-4, 3.12-2, 3.12-3) as follows:

“A COL applicant that references the U.S. EPR design certification will **describe essential elements of** a FAC condition monitoring program that is consistent with Generic Letter 89-08 and NSAC-202L-R3 for the carbon steel portions of the steam and power conversion systems that contain water or wet steam prior to initial fuel loading.”

Mike

Michael J. Miernicki
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Hearing Identifier: AREVA_EPR_DC_RAIs
Email Number: 4196

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From: WILLIFORD Dennis (AREVA)

Created By: Dennis.Williford@areva.com

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Tracking Status: None
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Tracking Status: None

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Options

Priority: High
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