

ArevaEPRDCPEm Resource

From: Miernicki, Michael
Sent: Monday, March 04, 2013 4:46 PM
To: WILLIFORD Dennis (AREVA)
Cc: Snyder, Amy
Subject: FW: Staff comments on EPR DC RAI 567, Question 03.02.02-15

Dennis, see comments below.

Mike

Michael J. Miernicki
Sr. Project Manager
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301-415-2304

From: Law, Yiu
Sent: Monday, March 04, 2013 4:42 PM
To: Miernicki, Michael
Cc: Ahmed, Sardar; Colaccino, Joseph
Subject: Staff comment on EPR RAI 03.02.02-15

Mike,

Here is the staff's comment on the advanced response to RAI 567 Question 03.02.02-15 dated December 11, 2012, provided by AREVA. The question pertains to the RPV refueling cavity ring and the advanced response is broken into 3 parts. Here is the staff's comment to each of these 3 parts:

- a) No comment.
- b) The staff asked the applicant to "confirm that an ITAAC or other verification applies to the attachment weld to the RPV". The applicant in its response addressed the attachment of the refueling cavity ring to the external seal ledge, stating that "since the attachment of the refueling cavity ring to the external seal ledge is outside of the jurisdiction of ASME Code Section III, the implementation of ITAAC is not necessary" but the applicant have not addressed the ITAAC or other verification that applies to the attachment weld to the RPV as requested by the staff.
- c) The applicant stated that "the rector cavity ring is constructed using fatigue analysis rules from ASME Section III, Class 2, and materials, design, fabrication and examination rules from Section III, Class 3 as a matter of good practice, to the extent that they can be applied."
 - 1) The applicant is requested to explain why using two different ASME Codes to design the cavity ring: one for fatigue analysis, and one for materials, design, fabrication and examination, is appropriate?
 - 2) The term "as a matter of good practice, to the extent that they can be applied" is vague. Response to RAI 337 Question 09.01.04-14 states that "The cavity ring is a mechanical component designed in accordance with Seismic Category I requirements and the stress limits of ASME BPVS, Section III, Subsection ND. ASME Code seal plate certification is not required." Based on this RAI response, the cavity ring should be designed to the ASME Code Subsection ND, not just as a good practice and to the extent that it can be applied. This is also inconsistent with the classification of ASME Code Class 2 indicated in response to RAI 567 Question 03.02.02-15. The staff does understand that an ASME stamp is not required.

Thanks,
Yiu

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