

## ArevaEPRDCPEm Resource

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**From:** WILLIFORD Dennis (AREVA) [Dennis.Williford@areva.com]  
**Sent:** Tuesday, May 28, 2013 2:24 PM  
**To:** Miernicki, Michael  
**Cc:** Snyder, Amy  
**Subject:** FW: Response to U.S. EPR Design Certification Application FNAL RAI No. 570 (6989), FSAR Ch.12, Supplement 1

Mike,

As we discussed this morning, RAI 570, Question 12.03-12.04-32 was sent final on April 12<sup>th</sup> – after discussion during clarification calls with NRC staff (including a revision to the question). This was also a follow-up to RAI 548, Question 12.03-12.04-30 (which was sent as final on November 27, 2012. We held telecons with NRC staff on RAI 548, Question 12.03-12.04-30 on Oct. 9<sup>th</sup> and Oct. 24<sup>th</sup> and received written comments/taking points from NRC staff on November 7<sup>th</sup>. This response included the supplemental questions/talking points provided by NRC staff.

So we had submitted the response to RAI 570, Question 12.03-12.04-32 as final on April 12<sup>th</sup> since we had numerous prior discussions on this topic and thought we understand and had fully addressed the issue. We subsequently received further comments on the final response to this question on April 26<sup>th</sup> – so in order to address NRC staff comments, we submitted a revised final response in Supplement 3 on May 17<sup>th</sup>. The changes to Section 3.8.3 were reflected in the April 12<sup>th</sup> response so we believed we had received all comments from NRC in the April 26<sup>th</sup> comments.

Thanks,  
Dennis

***Dennis Williford, P.E.***  
***U.S. EPR Design Certification Licensing Manager***  
***AREVA NP Inc.***

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**From:** Clark, Phyllis [mailto:Phyllis.Clark@nrc.gov]  
**Sent:** Friday, April 26, 2013 5:55 AM  
**To:** WILLIFORD Dennis (RS/NB)  
**Cc:** Miernicki, Michael; Snyder, Amy; Segala, John; Buckberg, Perry; Hearn, Peter  
**Subject:** FW: Response to U.S. EPR Design Certification Application FNAL RAI No. 570 (6989), FSAR Ch.12, Supplement 1

Dennis,

The staff has reviewed AREVA's response to RAI 570, Question 12.03-12.04-32 and have the following comments:

- The response to item 1 and associated FSAR markups are acceptable.
- For item 2, AREVA proposed a markup to ANP-10292, 'U.S. EPR Conformance with SRP Acceptance Criteria,' and provided a markup of the document in the response. In the markup of this document, AREVA adds FSAR Section 3.8.3.1.13 under SRP Criterion 12.3-12.4-AC-06 but it says that it is not applicable to U.S. EPR and is the COLs responsibility. However, at the present time, there is no COL action items in Section 3.8.3.1.13 related to radiation protection. Therefore, the staff does not understand why AREVA is saying that this section is the COL's responsibility.

The remainder of the response to Item 2 is acceptable.

- For Item 3, the response to Part c is acceptable. The following comments apply to their response to Item 3 Parts a and b:
  - In the response to Part a, AREVA states the following, “U.S. EPR FSAR, Tier 2, Section 14.2.12.5.2, (Reactor Containment Building Doors – Test #044), will also be revised to add a test of all radiation doors in containment at a lower value of 100 ft.-lbs. torque including the safety related doors in Technical Specification section 3.6.10.” However, AREVA never adds anything to Chapter 14 or anywhere else in the FSAR stating that the doors will be tested at 100 ft.-lbs. This information is needed in the FSAR to resolve this issue.
  - AREVA states in their proposed FSAR markup to section 3.8.3.1, “Periodic door testing will be performed during plant operation, similar to Section 14.2.12.5.2, Reactor Containment Building Doors, test #044 to confirm that the doors are capable of meeting the applicable requirements of 10 CFR 1601(d) and 10 CFR 1602.” There are multiple problems with this statement, as follows:
    - The applicant has to specify how often testing will be performed (instead of just saying periodic testing) (for example, the technical specifications tests on these doors are performed every 24 months).
    - They say the test will be similar to the test in Section 14.2.12.5.2, but do not describe any differences. Why not use the same test as test #044? In addition, the Chapter 14.2 tests are considered completed after power extension testing is complete (as stated in FSAR section 14.2.1.1). Therefore, if they are going to credit this test, or something similar to this test to be performed during operation, they would have to clearly make the distinction that this test does not expire with the other tests in section 14.2.
    - This test should confirm that the doors meet the applicable requirements of TS 5.7.1 and 5.7.2, as well as 10 CFR 20.1601(d) and 10 CFR 20.1602. Therefore, TS 5.7.1 and 5.7.2 should be included in this section of the FSAR markup.
    - The applicant forgot the “20” in 10 CFR 20.1601(d) and 10 CFR 20.1602.
  - Referring to the test described above, the applicant’s FSAR markup states, “Doors that are not capable of meeting design requirements per this test will be administratively controlled until repairs have been complete.” The term administrative controls is vague and it doesn’t explain what or how they will be administratively controlling things. Staff believes that more detail is needed but that this level of detail would be best addressed as added detail to the normal radiation protection program, which is addressed by a COL Action Item in FSAR Section 12.5. However, the level of detail provided in normal radiation protection programs (for example NEI 07-08 and NEI 07-03) does not cover the unique situation presented here. Therefore, staff recommends that AREVA add a COL action item that will require the COL applicant’s to state what actions will be performed in the event of a failed test.

If AREVA chooses to answer this question without a COL item, they must provide more detail on actions that will be performed in the event of a failed test and add it to the FSAR, the solution must not violate NRC regulations and must not be inconsistent with plant design, as provided in other areas of the FSAR.

- In the proposed FSAR markup for test #044, on pages 14.2-90 and 14.2-91, paragraphs 3.10 and 3.11.3 seem to be non-specific and somewhat confusing. For example, in paragraph 3.11.3, it is not clear from reading this paragraph if the door can be opened manually, without electricity, from the inside or not or if something external has to be activated to allow emergency egress. Therefore, the applicant should use wording similar to what is used in the markup of FSAR section 3.8.3.1 or simply refer to this FSAR section, when describing features for emergency egress in paragraphs 3.10 and 3.11.3 of test #044.

Please let me know if you have any questions.

Phyllis

*P. Clark*

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**From:** RYAN Tom (AREVA) [<mailto:Tom.Ryan@areva.com>]

**Sent:** Friday, April 12, 2013 3:23 PM

**To:** Snyder, Amy

**Cc:** DELANO Karen (AREVA); LEIGHLITER John (AREVA); ROMINE Judy (AREVA); RYAN Tom (AREVA); WILLS Tiffany (AREVA); HONMA George (EXTERNAL AREVA); KANE Steve (EXTERNAL AREVA); WILLIFORD Dennis (AREVA)

**Subject:** Response to U.S. EPR Design Certification Application FNAL RAI No. 570 (6989), FSAR Ch.12, Supplement 1

Amy,

AREVA NP Inc. provided a schedule for a technically correct and complete response to the one question in RAI No. 570 on April 10, 2013.

Attached please find AREVA NP Inc.'s technically correct and complete response to the subject request for additional information (RAI) as promised. The attached file, "RAI 570 Supplement 1 Response US EPR DC.pdf," provides a technically correct and complete final response to the one question in RAI No. 570.

Appended to this file are affected pages of the U.S. EPR Final Safety Analysis Report in redline-strikeout format which support the response to RAI 570, Question 12.03-12.04-32.

Also included are related markups to AREVA NP's document, ANP-10292, Revision 1, "U.S. EPR Conformance with Standard Review Plan (NUREG-0800) Technical Report."

The following table indicates the respective pages in the response document, "RAI 570 Supplement 1 Response US EPR DC.pdf," that contain AREVA NP's response to the subject question.

Question #	Start Page	End Page
RAI 570 — 12.03-12.04-32	2	5

This concludes the formal AREVA NP response to RAI 570, and there are no questions from this RAI for which AREVA NP has not provided responses.

Sincerely,

**Tom Ryan**

Project Engineer  
Regulatory Affairs

**AREVA NP**

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Charlotte, NC 28262

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**From:** WILLIFORD Dennis (RS/NB)

**Sent:** Wednesday, April 10, 2013 5:52 PM

**To:** [Amy.Snyder@nrc.gov](mailto:Amy.Snyder@nrc.gov)

**Cc:** [phyllis.clark@nrc.gov](mailto:phyllis.clark@nrc.gov); DELANO Karen (RS/NB); LEIGHLITER John (RS/NB); ROMINE Judy (RS/NB); RYAN Tom (RS/NB); WILLS Tiffany (CORP/QP); HONMA George (EXT); KANE Steve M (EXT)

**Subject:** Response to U.S. EPR Design Certification Application FNAL RAI No. 570 (6989), FSAR Ch.12

Amy,

Attached please find AREVA NP Inc.'s response to the subject request for additional information (RAI). The attached file, "RAI 570 Response US EPR DC.pdf" provides a schedule since a technically correct and complete response to this one question cannot be provided at this time.

The following table indicates the respective pages in the response document, "RAI 570 Response US EPR DC.pdf" that contain AREVA NP's response to the subject question.

Question #	Start Page	End Page
RAI 570 — 12.03-12.04-32	2	3

A complete answer is not provided for the one question. The schedule for a technically correct and complete final response to this question is provided below.

Question #	Response Date
RAI 570 — 12.03-12.04-32	April 12, 2013

Sincerely,

***Dennis Williford, P.E.***

***U.S. EPR Design Certification Licensing Manager***

***AREVA NP Inc.***

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**From:** Snyder, Amy [<mailto:Amy.Snyder@nrc.gov>]

**Sent:** Tuesday, March 12, 2013 12:34 PM

**To:** ZZ-DL-A-USEPR-DL

**Cc:** Stutzcage, Edward; McCoppin, Michael; Clark, Phyllis

**Subject:** U.S. EPR Design Certification Application FNAL RAI No. 570 (6989), FSAR Ch.12

RESENT-

Corrected the RAI question number from 12.03-32 to 12.03-12.04-32

See attached file.

Thank you

Amy

Attached, please find the subject requests for additional information (RAI). An advanced RAI was provided to you on January 18, 2013, and discussed with your staff on February 4, 2013. On February 8, 2013, the staff made substantive changes/ additional changes to the January 18, 2013 advanced RAI beyond what was discussed, based on the discussion during the February 4, 2013 teleconference. On February 22, 2013, AREVA made a suggested change to the wording of the RAI. On February 27, 2013 staff accepted AREVA's modification but added additional wording.

On March 7, 2013, you informed us that the modified advanced RAI is clear and no further clarification is needed and that the RAI does not contain any proprietary information. The schedule we have established for review of your application assumes technically correct and complete responses within 30 days of receipt of RAIs. For any RAIs that cannot be answered **within 30 days or April 11, 2013**, it is expected that a date for receipt of this information will be provided to the staff within the 30-day period so that the staff can assess how this information will impact the published schedule.”

Thank You,

Amy

Amy Snyder, U.S. EPR Design Certification Lead Project Manager  
Licensing Branch 1 (LB1)  
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**Hearing Identifier:** AREVA\_EPR\_DC\_RAIs  
**Email Number:** 4503

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**Subject:** FW: Response to U.S. EPR Design Certification Application FNAL RAI No. 570  
(6989), FSAR Ch.12, Supplement 1  
**Sent Date:** 5/28/2013 2:23:32 PM  
**Received Date:** 5/28/2013 2:23:36 PM  
**From:** WILLIFORD Dennis (AREVA)

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Tracking Status: None

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