

CCNPP3eRAIPEm Resource

From: Arora, Surinder
Sent: Thursday, July 10, 2014 9:37 AM
To: 'Infanger, Paul (paul.infanger@unistarnuclear.com)'; 'Mark.T.Finley@unistarnuclear.com'
Cc: CCNPP3eRAIPEm Resource; Segala, John; Wilson, Anthony; Clark, Phyllis; Scarbrough, Thomas; Clark, Theresa
Subject: CCNPP3 - Final RAI 421 MEB 7561
Attachments: FINAL RAI 421 MEB 7561.docx

Paul,

Attached is FINAL RAI No. 421 (eRAI No. 7561) pertaining to Calvert Cliffs Unit 3 FSAR Chapter 3, Section 3.9.6. This RAI is a follow up to your response for the previously issued Question 03.09-06-6 of RAI 405 (eRAI 7273). A clarification phone call requested by UniStar was held on July 10, 2014. However, the clarification phone call did not result in any changes to the draft RAI question and it was agreed that the RAI can be issued as final without any changes or modifications to the draft question.

Generally the review schedule of your COL application assumes that your technically complete response to the RAI question or a schedule for providing a complete response must be received within 30 days of the final issuance of the RAI. However, since Chapter 3 is not a "Group A" Chapter, the response schedule beyond 30 days will not impact the chapter completion which has not been established in accordance with your request in Letter No. UN#14-042, dated May 30, 2014. Although highly recommended, it is up to the UniStar to advise NRC staff about completion of the staff review relative to this RAI response.

Additionally, please make sure to include in your response letter a statement certifying whether or not your response contains any sensitive or proprietary information that needs to be withheld from the public disclosure.

Thanks.

SURINDER ARORA, PE
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Request for Additional Information 421 (eRAI 7561)

Issue Date: 07/10/2014

Application Title: Calvert Cliffs Unit 3 - Docket Number 52-016

Operating Company: UniStar

Docket No. 52-016

Review Section: 03.09.06 - Functional Design Qualification and Inservice Testing Programs for Pumps, Valves, and Dynamic Restraints

Application Section: 3.9.6

QUESTIONS

03.09.06-10

This RAI is a follow up to UniStar's response to RAI 405, Question 03.09.06-6

On March 26, 2014, the Calvert Cliffs Nuclear Power Plant (CCNPP) Unit 3 Combined License (COL) applicant (UniStar) submitted its response to RAI 03.09.06-6 on the changes to Table 3.9-2, "Site-Specific Inservice Valve Testing Program Requirements," in Revision 9 to the CCNPP Unit 3 FSAR. In its March 26 letter, the applicant provides a planned revision to CCNPP Unit 3 FSAR Table 3.9-2. The NRC staff requests that the applicant address the consistency of CCNPP Unit 3 FSAR Table 3.9-2 with the U.S. EPR FSAR and the ASME OM Code in the following specific areas:

1. Consistent with the ASME OM Code, U.S. EPR FSAR Tier 2, Table 3.9.6-2, "Inservice Valve Testing Program Requirements," specifies PI (position indication testing) requirements for manual valves that are OM Code Category B (no leakage requirements) and Passive (P) valves. However, CCNPP Unit 3 FSAR Table 3.9-2 specifies ET (exercise testing) without PI requirements for these manual valves.
2. Relief Valves (RVs) 30PED10AA190A, 30PED20AA190A, 30PED30AA190A, and 30PED40AA190A in CCNPP Unit 3 FSAR Table 3.9-2 are specified as having LT (leak testing) requirements, but are not categorized as A/C valves. Further, CCNPP Unit 3 FSAR Table 3.9-2 does not specify PI requirements for these RVs. Consistent with the ASME OM Code, U.S. EPR FSAR Tier 2, Table 3.9.6-2 specifies A/C categorization and PI requirements for RVs with leakage requirements.
3. Note 8 in Revision 9 to CCNPP Unit 3 FSAR Table 3.9-2 has deleted ST (stroke time testing) from the list of inservice testing requirements. Consistent with the ASME OM Code, this requirement is included in U.S. EPR FSAR Tier 2, Table 3.9.6-2.