

## ArevaEPRDCPEm Resource

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**From:** WILLIFORD Dennis (AREVA) [Dennis.Williford@areva.com]  
**Sent:** Friday, August 05, 2011 10:37 AM  
**To:** Tesfaye, Getachew  
**Cc:** BENNETT Kathy (AREVA); DELANO Karen (AREVA); ROMINE Judy (AREVA); RYAN Tom (AREVA); WELLS Russell (AREVA)  
**Subject:** Response to U.S. EPR Design Certification Application RAI No. 467, FSAR Ch. 3, Supplement 9  
**Attachments:** RAI 467 Supplement 9 Response US EPR DC.pdf

Getachew,

AREVA NP Inc. (AREVA NP) provided a schedule for the 14 questions of RAI No. 467 on February 24, 2011. AREVA NP submitted Supplement 1 on April 1, 2011 to provide technically correct and complete responses to 4 of the remaining 14 questions. AREVA NP submitted Supplement 2 on April 15, 2011, Supplement 3 on May 27, 2011, and Supplement 4 on June 22, 2011, to provide a revised schedule for 9 of the 10 remaining questions. AREVA NP submitted RAI 467 Supplement 5 on July 7, 2011, which provided a technically correct and complete response to 1 of the remaining 10 questions. AREVA NP submitted RAI 467 Supplement 6 on July 27, 2011, which provided a revised schedule for the remaining 9 questions. AREVA NP submitted RAI 467 Supplement 7 on July 29, 2011, which provided a technically correct and complete final responses to 3 of the remaining 9 questions. AREVA NP submitted RAI 467 Supplement 8 on August 3, 2011, which provided a technically correct and complete final response to 1 of the 6 remaining questions. The attached file, "RAI 467 Supplement 9 Response US EPR DC.pdf" provides technically correct and complete FINAL responses to 2 of the remaining 5 questions, as committed.

The following table indicates the respective pages in the response document, "RAI 467 Supplement 9 Response US EPR DC.pdf" that contain AREVA NP's final response to the subject questions.

Question #	Start Page	End Page
RAI 467 — 03.09.02-157	2	4
RAI 467 — 03.09.02-165	5	5

The schedule for technically correct and complete final responses to the remaining 3 questions is unchanged as provided below.

Question #	Response Date
RAI 467 — 03.06.03-28	September 15, 2011
RAI 467 — 03.09.02-160	September 9, 2011
RAI 467 — 03.09.02-161	September 9, 2011

Sincerely,

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

7207 IBM Drive, Mail Code CLT 2B  
Charlotte, NC 28262  
Phone: 704-805-2223  
Email: [Dennis.Williford@areva.com](mailto:Dennis.Williford@areva.com)

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**From:** WILLIFORD Dennis (RS/NB)  
**Sent:** Wednesday, August 03, 2011 12:38 PM

**To:** 'Tesfaye, Getachew'

**Cc:** BENNETT Kathy (RS/NB); DELANO Karen (RS/NB); ROMINE Judy (RS/NB); RYAN Tom (RS/NB); WELLS Russell (RS/NB)

**Subject:** Response to U.S. EPR Design Certification Application RAI No. 467, FSAR Ch. 3, Supplement 8

Getachew,

AREVA NP Inc. letter NRC:11:084 dated August 2, 2011 provides a technically correct and complete final response to 1 of the 6 remaining questions in RAI 467. AREVA NP considers some of the material contained in the response to be proprietary information. As required by 10 CFR 2.390(b), an affidavit is provided to support the withholding of the proprietary information from public disclosure. Proprietary and non-proprietary versions of the enclosure to this letter are provided separately.

The following table indicates the respective pages in the enclosed response that contain AREVA NP's final response to the subject question.

Question #	Start Page	End Page
RAI 467 — 03.09.02-163	2	5

The schedule for a technically correct and complete final response to Question 03.06.03-28 has been revised as shown below in bold. The schedule for technically correct and complete final responses to the remaining questions is unchanged as provided below.

Question #	Response Date
RAI 467 — 03.06.03-28	<b>September 15, 2011</b>
RAI 467 — 03.09.02-157	September 9, 2011
RAI 467 — 03.09.02-160	September 9, 2011
RAI 467 — 03.09.02-161	September 9, 2011
RAI 467 — 03.09.02-165	September 9, 2011

Sincerely,

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

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

***AREVA NP Inc.***

7207 IBM Drive, Mail Code CLT 2B

Charlotte, NC 28262

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**From:** WELLS Russell (RS/NB)

**Sent:** Friday, July 29, 2011 2:45 PM

**To:** Tesfaye, Getachew

**Cc:** WILLIFORD Dennis (RS/NB); ROMINE Judy (RS/NB); BENNETT Kathy (RS/NB); DELANO Karen (RS/NB); RYAN Tom (RS/NB)

**Subject:** Response to U.S. EPR Design Certification Application RAI No. 467, FSAR Ch. 3, Supplement 7

Getachew,

AREVA NP Inc. (AREVA NP) provided a schedule for the 14 questions of RAI No. 467 on February 24, 2011. AREVA NP submitted Supplement 1 on April 1, 2011 to provide technically correct and complete responses to 4 of the remaining 14 questions. AREVA NP submitted Supplement 2 on April 15, 2011, Supplement 3 on May 27, 2011, and Supplement 4 on June 22, 2011, to provide a revised schedule for 9 of the 10 remaining

questions. AREVA NP submitted RAI 467 Supplement 5 on July 7, 2011, which provided a technically correct and complete response to 1 of the remaining 10 questions. AREVA NP submitted RAI 467 Supplement 6 on July 27, 2011, which provided a revised schedule for the remaining 9 questions. The attached file, "RAI 467 Supplement 7 Response US EPR DC.pdf" provides technically correct and complete FINAL responses to 3 of the remaining 9 questions, as committed.

The following table indicates the respective pages in the response document, "RAI 467 Supplement 7 Response US EPR DC.pdf" that contain AREVA NP's response to the subject questions.

Question #	Start Page	End Page
RAI 467 — 03.09.02-155	2	3
RAI 467 — 03.09.02-156	4	4
RAI 467 — 03.09.02-162	5	6

The schedule for technically correct and complete FINAL responses to the remaining 6 questions is unchanged as provided below.

Question #	Response Date
RAI 467 — 03.06.03-28	August 15, 2011
RAI 467 — 03.09.02-157	September 9, 2011
RAI 467 — 03.09.02-160	September 9, 2011
RAI 467 — 03.09.02-161	September 9, 2011
RAI 467 — 03.09.02-163	September 9, 2011
RAI 467 — 03.09.02-165	September 9, 2011

Sincerely,

*Russ Wells for*  
**Dennis Williford, P.E.**  
**U.S. EPR Design Certification Licensing Manager**  
**AREVA NP Inc.**  
 7207 IBM Drive, Mail Code CLT 2B  
 Charlotte, NC 28262  
 Phone: 704-805-2223  
 Email: [Dennis.Williford@areva.com](mailto:Dennis.Williford@areva.com)

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**From:** WELLS Russell (RS/NB)  
**Sent:** Wednesday, July 27, 2011 10:23 AM  
**To:** 'Tefaye, Getachew'  
**Cc:** WILLIFORD Dennis (RS/NB); ROMINE Judy (RS/NB); BENNETT Kathy (RS/NB); DELANO Karen (RS/NB); RYAN Tom (RS/NB)  
**Subject:** Response to U.S. EPR Design Certification Application RAI No. 467, FSAR Ch. 3, Supplement 6

Getachew,

AREVA NP Inc. (AREVA NP) provided a schedule for the 14 questions of RAI No. 467 on February 24, 2011. AREVA NP submitted Supplement 1 on April 1, 2011 to provide technically correct and complete responses to 4 of the remaining 14 questions. AREVA NP submitted Supplement 2 on April 15, 2011, Supplement 3 on May 27, 2011, and Supplement 4 on June 22, 2011, to provide a revised schedule for 9 of the 10 remaining questions. AREVA NP submitted RAI 467 Supplement 5 on July 7, 2011, which provided a technically correct and complete response to 1 of the remaining 10 questions.

The schedule for technically correct and complete responses to the remaining 9 questions has been changed as provided below.

Question #	Response Date
RAI 467 — 03.06.03-28	August 15, 2011
RAI 467 — 03.09.02-155	<b>September 9, 2011</b>
RAI 467 — 03.09.02-156	<b>September 9, 2011</b>
RAI 467 — 03.09.02-157	<b>September 9, 2011</b>
RAI 467 — 03.09.02-160	<b>September 9, 2011</b>
RAI 467 — 03.09.02-161	<b>September 9, 2011</b>
RAI 467 — 03.09.02-162	<b>September 9, 2011</b>
RAI 467 — 03.09.02-163	<b>September 9, 2011</b>
RAI 467 — 03.09.02-165	<b>September 9, 2011</b>

Sincerely,

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

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---

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

**Sent:** Thursday, July 07, 2011 11:35 AM

**To:** Tesfaye, Getachew

**Cc:** BENNETT Kathy (RS/NB); DELANO Karen (RS/NB); ROMINE Judy (RS/NB); RYAN Tom (RS/NB); WELLS Russell (RS/NB)

**Subject:** Response to U.S. EPR Design Certification Application RAI No. 467, FSAR Ch. 3, Supplement 5

Getachew,

AREVA NP Inc. (AREVA NP) provided a schedule for the 14 questions of RAI No. 467 on February 24, 2011. AREVA NP submitted Supplement 1 on April 1, 2011 to provide technically correct and complete responses to 4 of the remaining 14 questions. AREVA NP submitted Supplement 2 on April 15, 2011, Supplement 3 on May 27, 2011, and Supplement 4 on June 22, 2011, to provide a revised schedule for 9 of the 10 remaining questions.

The attached file, "RAI 467 Supplement 5 Response US EPR DC.pdf" provides a technically correct and complete response to 1 of the remaining 10 questions.

The following table indicates the respective pages in the response document, "RAI 467 Supplement 5 Response US EPR DC.pdf," that contain AREVA NP's response to the subject questions.

Question #	Start Page	End Page
RAI 467 — 03.09.02-167	2	2

The schedule for technically correct and complete responses to the remaining 9 questions is unchanged as provided below.

Question #	Response Date
RAI 467 — 03.06.03-28	August 15, 2011
RAI 467 — 03.09.02-155	July 27, 2011
RAI 467 — 03.09.02-156	July 27, 2011
RAI 467 — 03.09.02-157	July 27, 2011
RAI 467 — 03.09.02-160	July 27, 2011
RAI 467 — 03.09.02-161	July 27, 2011
RAI 467 — 03.09.02-162	July 27, 2011
RAI 467 — 03.09.02-163	July 27, 2011
RAI 467 — 03.09.02-165	July 27, 2011

Sincerely,

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

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Charlotte, NC 28262  
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**From:** WILLIFORD Dennis (RS/NB)  
**Sent:** Wednesday, June 22, 2011 12:57 PM  
**To:** 'Tesfaye, Getachew'  
**Cc:** BENNETT Kathy (RS/NB); DELANO Karen (RS/NB); ROMINE Judy (RS/NB); RYAN Tom (RS/NB); WELLS Russell (RS/NB)  
**Subject:** Response to U.S. EPR Design Certification Application RAI No. 467, FSAR Ch. 3, Supplement 4

Getachew,

AREVA NP Inc. (AREVA NP) provided a schedule for the 14 questions of RAI No. 467 on February 24, 2011. AREVA NP submitted Supplement 1 on April 1, 2011 to provide technically correct and complete responses to 4 of the remaining 14 questions. AREVA NP submitted Supplement 2 on April 15, 2011 and Supplement 3 on May 27, 2011, to provide a revised schedule for 9 of the 10 remaining questions

The schedule for 9 of the 10 questions, shown in bold below, has been changed. The schedule for the remaining question is unchanged. The schedule for technically correct and complete responses to the remaining questions is provided below.

Question #	Response Date
RAI 467 — 03.06.03-28	August 15, 2011
<b>RAI 467 — 03.09.02-155</b>	<b>July 27, 2011</b>
<b>RAI 467 — 03.09.02-156</b>	<b>July 27, 2011</b>
<b>RAI 467 — 03.09.02-157</b>	<b>July 27, 2011</b>
<b>RAI 467 — 03.09.02-160</b>	<b>July 27, 2011</b>
<b>RAI 467 — 03.09.02-161</b>	<b>July 27, 2011</b>
<b>RAI 467 — 03.09.02-162</b>	<b>July 27, 2011</b>
<b>RAI 467 — 03.09.02-163</b>	<b>July 27, 2011</b>
<b>RAI 467 — 03.09.02-165</b>	<b>July 27, 2011</b>
<b>RAI 467 — 03.09.02-167</b>	<b>July 27, 2011</b>

Sincerely,

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

7207 IBM Drive, Mail Code CLT 2B  
Charlotte, NC 28262  
Phone: 704-805-2223  
Email: [Dennis.Williford@areva.com](mailto:Dennis.Williford@areva.com)

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**From:** WILLIFORD Dennis (RS/NB)  
**Sent:** Friday, May 27, 2011 11:11 AM  
**To:** Tesfaye, Getachew  
**Cc:** BENNETT Kathy (RS/NB); DELANO Karen (RS/NB); ROMINE Judy (RS/NB); RYAN Tom (RS/NB); WELLS Russell (RS/NB); CORNELL Veronica (External RS/NB)  
**Subject:** Response to U.S. EPR Design Certification Application RAI No. 467, FSAR Ch. 3, Supplement 3

Getachew,

AREVA NP Inc. (AREVA NP) provided a schedule for the 14 questions of RAI No. 467 on February 24, 2011. AREVA NP submitted Supplement 1 on April 1, 2011 to provide technically correct and complete responses to 4 of the remaining 14 questions. AREVA NP submitted Supplement 2 on April 15, 2011 to provide a revised schedule for 9 of the 10 remaining questions

The schedule for 9 of the 10 questions, shown in bold below, has been changed. The schedule for the remaining question is unchanged. The schedule for technically correct and complete responses to the remaining questions is provided below.

Question #	Response Date
RAI 467 — 03.06.03-28	August 15, 2011
<b>RAI 467 — 03.09.02-155</b>	<b>June 27, 2011</b>
<b>RAI 467 — 03.09.02-156</b>	<b>June 27, 2011</b>
<b>RAI 467 — 03.09.02-157</b>	<b>June 27, 2011</b>
<b>RAI 467 — 03.09.02-160</b>	<b>June 27, 2011</b>
<b>RAI 467 — 03.09.02-161</b>	<b>June 27, 2011</b>
<b>RAI 467 — 03.09.02-162</b>	<b>June 27, 2011</b>
<b>RAI 467 — 03.09.02-163</b>	<b>June 27, 2011</b>
<b>RAI 467 — 03.09.02-165</b>	<b>June 27, 2011</b>
<b>RAI 467 — 03.09.02-167</b>	<b>June 27, 2011</b>

Sincerely,

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

7207 IBM Drive, Mail Code CLT 2B  
Charlotte, NC 28262  
Phone: 704-805-2223  
Email: [Dennis.Williford@areva.com](mailto:Dennis.Williford@areva.com)

---

**From:** WELLS Russell (RS/NB)  
**Sent:** Friday, April 15, 2011 4:15 PM  
**To:** Tesfaye, Getachew

**Cc:** BENNETT Kathy (RS/NB); DELANO Karen (RS/NB); ROMINE Judy (RS/NB); RYAN Tom (RS/NB)  
**Subject:** Response to U.S. EPR Design Certification Application RAI No. 467, FSAR Ch. 3, Supplement 2

Getachew,

AREVA NP Inc. (AREVA NP) provided a schedule for the 14 questions of RAI No. 467 on February 24, 2011. AREVA NP submitted Supplement 1 on April 1, 2011 to provide technically correct and complete responses to 4 of the remaining 14 questions.

To allow additional time to interact with NRC staff, the schedule for technically correct and complete responses to 9 of the 10 has been changed and is provided below. The schedule for a technically correct and complete response to the remaining question is unchanged and is provided below:

Question #	Response Date
RAI 467 — 03.06.03-28	August 15, 2011
RAI 467 — 03.09.02-155	<b>May 27, 2011</b>
RAI 467 — 03.09.02-156	<b>May 27, 2011</b>
RAI 467 — 03.09.02-157	<b>May 27, 2011</b>
RAI 467 — 03.09.02-160	<b>May 27, 2011</b>
RAI 467 — 03.09.02-161	<b>May 27, 2011</b>
RAI 467 — 03.09.02-162	<b>May 27, 2011</b>
RAI 467 — 03.09.02-163	<b>May 27, 2011</b>
RAI 467 — 03.09.02-165	<b>May 27, 2011</b>
RAI 467 — 03.09.02-167	<b>May 27, 2011</b>

*Sincerely,*

*Russ Wells*

*U.S. EPR Design Certification Licensing Manager*

*AREVA NP, Inc.*

*3315 Old Forest Road, P.O. Box 10935*

*Mail Stop OF-57*

*Lynchburg, VA 24506-0935*

*Phone: 434-832-3884 (work)*

*434-942-6375 (cell)*

*Fax: 434-382-3884*

*[Russell.Wells@Areva.com](mailto:Russell.Wells@Areva.com)*

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**From:** WELLS Russell (RS/NB)

**Sent:** Friday, April 01, 2011 1:24 PM

**To:** 'Tesfaye, Getachew'

**Cc:** BENNETT Kathy (RS/NB); DELANO Karen (RS/NB); ROMINE Judy (RS/NB); RYAN Tom (RS/NB)

**Subject:** Response to U.S. EPR Design Certification Application RAI No. 467, FSAR Ch. 3, Supplement 1

Getachew,

AREVA NP Inc. (AREVA NP) provided a schedule for the 14 questions of RAI No. 467 on February 24, 2011. The attached file, "RAI 467 Supplement 1 Response US EPR DC.pdf" provides technically correct and complete responses to 4 of the remaining 14 questions, as committed.



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 467 Questions 03.09.02-158, 03.09.02-159, and 03.09.02-164.

The following table indicates the respective pages in the response document, "RAI 467 Supplement 1 Response US EPR DC.pdf," that contain AREVA NP's response to the subject questions.

Question #	Start Page	End Page
RAI 467 — 03.09.02-158	6	6
RAI 467 — 03.09.02-159	7	7
RAI 467 — 03.09.02-164	12	12
RAI 467 — 03.09.02-166	14	14

The schedule for technically correct and complete responses to the remaining questions is unchanged and is provided below:

Question #	Response Date
RAI 467 — 03.06.03-28	August 15, 2011
RAI 467 — 03.09.02-155	April 28, 2011
RAI 467 — 03.09.02-156	April 28, 2011
RAI 467 — 03.09.02-157	April 28, 2011
RAI 467 — 03.09.02-160	April 28, 2011
RAI 467 — 03.09.02-161	April 28, 2011
RAI 467 — 03.09.02-162	April 28, 2011
RAI 467 — 03.09.02-163	April 28, 2011
RAI 467 — 03.09.02-165	April 28, 2011
RAI 467 — 03.09.02-167	April 28, 2011

*Sincerely,*

*Russ Wells*

*U.S. EPR Design Certification Licensing Manager*

*AREVA NP, Inc.*

*3315 Old Forest Road, P.O. Box 10935*

*Mail Stop OF-57*

*Lynchburg, VA 24506-0935*

*Phone: 434-832-3884 (work)*

*434-942-6375 (cell)*

*Fax: 434-382-3884*

*[Russell.Wells@Areva.com](mailto:Russell.Wells@Areva.com)*

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**From:** WELLS Russell (RS/NB)

**Sent:** Thursday, February 24, 2011 2:08 PM

**To:** 'Tefsaye, Getachew'

**Cc:** DELANO Karen (RS/NB); ROMINE Judy (RS/NB); BENNETT Kathy (RS/NB); BRYAN Martin (External RS/NB)

**Subject:** Response to U.S. EPR Design Certification Application RAI No. 467, FSAR Ch. 3

Getachew,

Attached please find AREVA NP Inc.'s response to the subject request for additional information (RAI). The attached file, "RAI 467 Response US EPR DC.pdf" provides a schedule for a technically correct and complete response to the 14 questions.



The following table indicates the respective pages in the response document, "RAI 467 Response US EPR DC.pdf" that contain AREVA NP's response to the subject questions.

Question #	Start Page	End Page
RAI 467 — 03.06.03-28	2	2
RAI 467 — 03.09.02-155	3	3
RAI 467 — 03.09.02-156	4	4
RAI 467 — 03.09.02-157	5	5
RAI 467 — 03.09.02-158	6	6
RAI 467 — 03.09.02-159	7	7
RAI 467 — 03.09.02-160	8	8
RAI 467 — 03.09.02-161	9	9
RAI 467 — 03.09.02-162	10	10
RAI 467 — 03.09.02-163	11	11
RAI 467 — 03.09.02-164	12	12
RAI 467 — 03.09.02-165	13	13
RAI 467 — 03.09.02-166	14	14
RAI 467 — 03.09.02-167	15	15

A complete answer is not provided for the 14 questions. The schedule for a technically correct and complete response to these questions is provided below.

Question #	Response Date
RAI 467 — 03.06.03-28	August 15, 2011
RAI 467 — 03.09.02-155	April 28, 2011
RAI 467 — 03.09.02-156	April 28, 2011
RAI 467 — 03.09.02-157	April 28, 2011
RAI 467 — 03.09.02-158	April 28, 2011
RAI 467 — 03.09.02-159	April 28, 2011
RAI 467 — 03.09.02-160	April 28, 2011
RAI 467 — 03.09.02-161	April 28, 2011
RAI 467 — 03.09.02-162	April 28, 2011
RAI 467 — 03.09.02-163	April 28, 2011
RAI 467 — 03.09.02-164	April 28, 2011
RAI 467 — 03.09.02-165	April 28, 2011
RAI 467 — 03.09.02-166	April 28, 2011
RAI 467 — 03.09.02-167	April 28, 2011

Sincerely,

*Russ Wells*  
*U.S. EPR Design Certification Licensing Manager*  
**AREVA NP, Inc.**  
*3315 Old Forest Road, P.O. Box 10935*  
*Mail Stop OF-57*

Lynchburg, VA 24506-0935  
Phone: 434-832-3884 (work)  
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[Russell.Wells@Areva.com](mailto:Russell.Wells@Areva.com)

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**From:** Tesfaye, Getachew [mailto:Getachew.Tesfaye@nrc.gov]  
**Sent:** Wednesday, January 26, 2011 3:34 PM  
**To:** ZZ-DL-A-USEPR-DL  
**Cc:** Reichelt, Eric; Terao, David; Wong, Yuken; Dixon-Herrity, Jennifer; Miernicki, Michael; Colaccino, Joseph; ArevaEPRDCPEm Resource  
**Subject:** U.S. EPR Design Certification Application RAI No. 467 (5333, 5344), FSAR Ch. 3

Attached please find the subject requests for additional information (RAI). A draft of the RAI was provided to you on January 6, 2011, and discussed with your staff on January 20 and 24, 2011. No change is made to the draft RAI as a result of those discussions. 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, 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.

Thanks,  
Getachew Tesfaye  
Sr. Project Manager  
NRO/DNRL/NARP  
(301) 415-3361

**Hearing Identifier:** AREVA\_EPR\_DC\_RAIs  
**Email Number:** 3305

**Mail Envelope Properties** (2FBE1051AEB2E748A0F98DF9EEE5A5D482D28B)

**Subject:** Response to U.S. EPR Design Certification Application RAI No. 467, FSAR Ch.  
3, Supplement 9  
**Sent Date:** 8/5/2011 10:37:18 AM  
**Received Date:** 8/5/2011 10:37:53 AM  
**From:** WILLIFORD Dennis (AREVA)

**Created By:** Dennis.Williford@areva.com

**Recipients:**  
"BENNETT Kathy (AREVA)" <Kathy.Bennett@areva.com>  
Tracking Status: None  
"DELANO Karen (AREVA)" <Karen.Delano@areva.com>  
Tracking Status: None  
"ROMINE Judy (AREVA)" <Judy.Romine@areva.com>  
Tracking Status: None  
"RYAN Tom (AREVA)" <Tom.Ryan@areva.com>  
Tracking Status: None  
"WELLS Russell (AREVA)" <Russell.Wells@areva.com>  
Tracking Status: None  
"Tsfaye, Getachew" <Getachew.Tsfaye@nrc.gov>  
Tracking Status: None

**Post Office:** auscharm02.adom.ad.corp

Files	Size	Date & Time
MESSAGE	21190	8/5/2011 10:37:53 AM
RAI 467 Supplement 9 Response US EPR DC.pdf		69663

**Options**  
**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**

**Response to**  
**Request for Additional Information No. 467(5333, 5344)**  
**Supplement 9**

**1/26/2011**

**U.S. EPR Standard Design Certification**  
**AREVA NP Inc.**  
**Docket No. 52-020**

**SRP Section: 03.06.03 - Leak-Before-Break Evaluation Procedures**  
**SRP Section: 03.09.02 - Dynamic Testing and Analysis of Systems Structures and**  
**Components**  
**Application Section: FSAR Chapter 3**

**QUESTIONS for Component Integrity, Performance, and Testing Branch 1**  
**(AP1000/EPR Projects) (CIB1)**  
**QUESTIONS for Engineering Mechanics Branch 2 (ESBWR/ABWR Projects)**  
**(EMB2)**

**Question 03.09.02-157:**

The applicant states in FSAR, Appendix 3C.1.1, paragraph 2 and Appendix 3C.1.2, paragraph 2 that the “SG model is based on zero percent tube plugging.” The staff requests the applicant to explain why this is conservative over the life of the plant.

**Response to Question 03.09.02-157:**

AREVA NP uses a thermal-hydraulic model developed in the computer program CRAFT2 (described in U.S. EPR FSAR, Tier 2, Section 3C.6) in order to determine loading in the Reactor Coolant System (RCS), including the reactor pressure vessel (RPV) internal components and steam generator (SG) tubing primary side. These loadings occur during a primary side pipe rupture event, postulated to occur at hot leg or cold leg attached piping connections. The primary side model of the RCS consists of control volumes and flow paths representative of the flow areas through the components and piping. The flow area through the primary side of the SG tubes is calculated using zero percent tube plugging, as stated in U.S. EPR FSAR Tier 2, Sections 3C.1.1 and 3C.1.2.

Consideration of plugging of up to 10 percent of the SG tubes results in a reduction in flow area and an increase in steady-state pressure drop and fluid velocity in the tubes. The calculated pressure drops across the SG for zero percent tube plugging and 10 percent tube plugging are approximately 43.7 psid and 49.3 psid, respectively. This increased pressure drop across the primary side of the SG, caused by plugging of the tubes, has the following effects on the RCS pressures and flow rates:

- Due to the decreased flow area through the primary side of the SG tubes, the fluid velocity and, consequently, the pressure drop within the tubes are increased.
- Due to the increased pressure drop across the SG, the flow rate throughout the RCS is decreased slightly, which results in decreased fluid velocity throughout the RCS, excluding the SG tubes.
- Due to the pressure in the hot leg being controlled by the pressurizer, it is not affected by the increased tube plugging.
- Due to the increased pressure drop across the SG, the pressure in the cold leg decreases slightly.
- Due to the decreased RCS flow rate, the pressure drop across the RPV decreases slightly.

From this list of changes to the operating conditions of the RCS, it is clear that the fluid velocity in the piping at the break locations is reduced slightly and the pressure in the piping at the break locations is the same or reduced slightly by SG tube plugging.

During a pipe rupture event, the greatest loads on the piping and components occur immediately after the rupture and are caused by the rarefaction wave emanating from the rupture site. The strength of the rarefaction wave is dependent upon the pressure in the pipe and the size of the break. Therefore, although the difference is not considered significant, the reduced operating pressure in the cold leg caused by SG tube plugging leads to a rarefaction wave of reduced strength following a break in piping attached to the cold leg.

Effects of Tube Plugging on RCS Components and Piping:

- Reactor Pressure Vessel and Internal Components
  - Reduced flow rate and pressure drop across the RPV causes reduced steady-state operating loads on internal components.
  - Reduced rarefaction wave strength from a cold-leg-attached piping break causes reduced peak forces after the postulated rupture.
- Reactor Coolant Pump
  - Reduced flow rate causes a slight increase in pump head but has no impact on steady-state operating loads on internal components.
  - Reduced rarefaction wave strength from a cold-leg-attached piping break causes reduced peak forces after the postulated rupture.
- Reactor Coolant Piping
  - Reduced flow rate and pressure drop across the RCS piping causes reduced steady-state operating loads on internal components.
  - Reduced rarefaction wave strength from a cold-leg-attached piping break causes reduced peak forces after the postulated rupture.
- Steam Generator
  - Increased pressure drop across the SG slightly increases steady-state operating load in the primary head partition plate. This increased pressure remains within the design conditions for the plate.
  - Reduced rarefaction wave strength causes reduced peak forces after the postulated rupture.
- Steam Generator Tubes and Tube Support Components
  - Increased velocity and pressure drop in the tubes has no impact on steady-state operating loads.
  - Reduced rarefaction wave strength causes reduced peak forces after the postulated rupture when considering loads on the entire tube bundle.
  - Tube plugging causes a reduced number of tubes to respond to the pipe rupture forcing function.

As indicated above, there is no adverse impact of tube plugging on the RPV and its internal components, the RCP, or the RCS piping. The following discussion provides an evaluation of the impact of tube plugging on the SG and its internal components.

Impact of Tube Plugging on the SG and the SGs Internal Components:

In the event of a primary side pipe rupture, the abrupt changes in flow rate cause lateral loads in the SG tube U-bend and resulting loads in the tube support plates. The resulting loads during a pipe rupture transient are directly proportional to the strength of the rarefaction wave traveling through the system and the natural frequencies of the tube bundle. As stated previously, consideration of plugged tubes does not impact the strength of the rarefaction wave or the

natural frequencies of the tube bundle. Therefore, as for the other RCS components, there is no adverse impact to loads in the SG and its internal components caused by SG tube plugging.

**SG Critical Components:**

The critical components in the SG that are affected by the modeling and loading of the tubes are the tube support plates, which are broached-hole plates designed to allow secondary side flow while providing lateral support and stability for the tubes under all loading conditions. These components are shown in U.S. EPR FSAR Tier 2, Figure 5.4-2. The failure mechanism for the tube support plates involves their impact on the flow area of the tubes. In other words, high lateral loads on the tube support plates tend to cause distortion of the tube support plate and the tube holes, which can reduce the tube flow area in extreme cases. In order to prevent this occurrence, the allowable loads on the tube support plates are selected such that no reduction in tube flow area is caused by the loading.

**FSAR Impact:**

The U.S. EPR FSAR will not be changed as a result of this question.



**Question 03.09.02-165:**

The applicant provided the Figure 3C-9 (FSAR Appendix 3C, page 3C-40) to illustrate the variation of the modal damping and the Rayleigh Damping curve applied to the SSE analysis of the reactor vessel internals, with the horizontal axis for frequency and the vertical axis for the percentage damping. It is observed that the two axes have no numerical values associated with them. The staff requests the applicant to provide the numerical values of variables along the ordinate and the abscissa of the damping curve.

**Response to Question 03.09.02-165:**

The Response to RAI 371, Supplement 7, Figure 03.07.01-29-1 provides a detailed plot with numerical values of the ordinate and abscissa of the damping curve as indicated in U.S.EPR FSAR Tier 2, Figure 3C-9.

**FSAR Impact:**

The U.S. EPR FSAR will not be changed as a result of this question.