

## CCNPP3COLA PEmails

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**From:** Arora, Surinder  
**Sent:** Friday, January 06, 2012 2:36 PM  
**To:** 'Infanger, Paul'  
**Cc:** DeMarshall, Joseph; Harbuck, Craig; Segala, John; Hearn, Peter; CCNPP3COL Resource  
**Subject:** FW: Attendees for RAI 305 Setpoint Program Call  
**Attachments:** image001.png; RAI 305\_Question 16-23 Supplemental Response Items.docx

The NRC Staff attendees in this phone call were:

Joe DeMarshall, Technical Reviewer  
Craig Harbuck, Technical Reviewer  
Peter Hearn, Chapter 16 PM  
Surinder Arora, Calvert Cliffs COLA Lead PM  
John Segala, EPR Projects Branch Chief (Part Time)

This was a noticed public phone call (although, no public participation was there). During the Phone call, the NRC staff discussed UniStar's response to Question 16-23 of RAI 305 (ML11236A142, UniStar letter dated 8/18/2011) and provided comments. A brief description of the items discussed are summarized in the attached list.

Based on the discussion, UniStar will issue a supplementary response to this RAI which will incorporate the changes discussed during the phone call. This supplementary response will supersede the current response.

Thanks.

**SURINDER ARORA, PE**  
**PROJECT MANAGER,**  
**Office of New Reactors**  
**US Nuclear Regulatory Commission**

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**From:** Infanger, Paul [<mailto:paul.infanger@unistarnuclear.com>]  
**Sent:** Thursday, January 05, 2012 1:49 PM  
**To:** Arora, Surinder  
**Subject:** Attendees for RAI 305 Setpoint Program Call

UniStar: Paul Infanger, Wayne Massie, Frederico Perdomo, John Rucki, Tom Roberts, Mark Hunter, Cyril Roden,

AREVA: Tony LENTZ; Steve KANE ; Chris DOYEL; Robert MANN; Robert SHARPE; Geb BROMAN, Mel GMYREK, Brian MCINTYRE, Russ WELLS.

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**Hearing Identifier:** CalvertCliffs\_Unit3Cola\_Public\_EX  
**Email Number:** 2793

**Mail Envelope Properties** (B46615B367D1144982B324704E3BCEED8B964946C0)

**Subject:** FW: Attendees for RAI 305 Setpoint Program Call  
**Sent Date:** 1/6/2012 2:36:17 PM  
**Received Date:** 1/6/2012 2:36:18 PM  
**From:** Arora, Surinder

**Created By:** Surinder.Arora@nrc.gov

**Recipients:**

"DeMarshall, Joseph" <Joseph.DeMarshall@nrc.gov>  
Tracking Status: None  
"Harbuck, Craig" <Craig.Harbuck@nrc.gov>  
Tracking Status: None  
"Segala, John" <John.Segala@nrc.gov>  
Tracking Status: None  
"Hearn, Peter" <Peter.Hearn@nrc.gov>  
Tracking Status: None  
"CCNPP3COL Resource" <CCNPP3COL.Resource@nrc.gov>  
Tracking Status: None  
"Infanger, Paul" <paul.infanger@unistarnuclear.com>  
Tracking Status: None

**Post Office:** HQCLSTR01.nrc.gov

Files	Size	Date & Time
MESSAGE	2532	1/6/2012 2:36:18 PM
image001.png	4971	
RAI 305_Question 16-23 Supplemental Response Items.docx		20229

**Options**

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



The response requires clarifying information with respect to the following:

**NRC Question 16-23, Item 2:**

“Summary of Departure” paragraph on pages 7 and 20 did not completely address the issues identified under Item 2, on page 2 of the response. The referenced paragraph inaccurately states “Numerical setpoints in the bracketed “Nominal Trip Setpoint” column of Table 3.3.1-2 are removed and replaced with a reference to the Setpoint Control Program.” In the RCOLA, both the Nominal Trip Setpoint column of Table 3.3.1-2, and the reference footnote used to replace the numerical setpoints, were deleted in Part C of the response to RAI 190, Question 16-20 (see page 8 of that response). “Summary of Departure paragraph” needs to be revised accordingly.

**NRC Question 16-23, Item 4:**

Subpart (b) quoted paragraph from ANP-10275P-A on page 9, which states “This report addresses the uncertainty methodology for the inputs to complex functions, “ requires additional clarification regarding applicability of the uncertainty methodology described in AREVA Topical Report ANP-10275P-A, “U.S. EPR Instrument Setpoint Methodology for U.S. EPR Topical Report,” to the High Core Power Level, Low Saturation Margin, and Anti-Dilution Mitigation Functions. It is not clear from the quoted paragraph that uncertainty methodology described in ANP-10275P-A is directly applicable to these functions. Provide the necessary clarification.

**NRC Question 16-23, Item 5:**

Correct editorial errors on pages 10 and 19. Delete the word “that” from the statement in subparts (f) and (g) which reads “In accordance with Specification 5.5.18, the Setpoint Control Program shall establish a document **that** containing the current value ...”

**NRC Question 16-23, Item 7:**

Revise the paragraph at the bottom of page 10 to read “Regarding the request to provide clarifying information regarding the bracketed information and associated Reviewer’s Note in the Definitions Section of the GTS, UniStar will revise Part 4, Generic Changes, Item 1, TS 1.1, Definitions as follows:” The words “Definitions Section of the GTS” replaces the words “Bases discussion for the Protection System Response Time Surveillance Requirement (SR 3.3.1.10)”.

Section 13, BASES 3.3.1 PROTECTION SYSTEM (PS), on page 12 does not have a corresponding “Plant-Specific Technical Specifications” subpart. Provide the missing “Plant-Specific Technical Specifications” information, similar to the DEFINITIONS Section on page 11, which addresses both the Generic and Plant-Specific Technical specifications.

Item (i) on the bottom of page 18 for the TS Bases needs to be revised to address both the Generic and Plant-Specific Technical Specifications, similar to DEFINITIONS Section 1 on pages 13 and 14 of the COLA Impact Section of the response.

### **NRC Question 16-23, Item 8:**

Item 8 on pages 12 and 13 pertains to the designation of “Essential Service Water Cooling Tower Basin Level” as a plant-specific Type “A” PAMS variable. Inclusion of this plant-specific PAM variable in the RCOLA would warrant a Departure due to the PAMS “Bounding List” approach adopted by AREVA in the DCD, unless AREVA chooses to bracket this variable in the Design Certification. Determine the appropriate course of action and revise the response accordingly if a Departure is warranted. Note that if a Departure is utilized (i.e., ESSW CTB Level not bracketed in the DC), there is the possibility that it could bring into question the validity of the bounding PAMS list provided by AREVA.

### **Setpoint Control Program TS steps 5.5.18.c.3 and 5.5.18.c.4:**

Suggested changes to steps 5.5.18.c.3 and 5.5.18.c.4 of the SCP TS on page 17 are provided below. Note that incorporation of these changes will also require the appropriate revisions be made to UniStar’s response to NRC Question 16-23, Item 4, Subpart (a) on page 8, which presently addresses only the revision to Step C.4.

- 3 If any as-found calibration setting value is outside the limits of “previous as-left value  $\pm$  PTAC” or “calibration setting  $\pm$  PTAC,” but conservative with respect to the AV, then the sensor shall be evaluated to verify that it is functioning in accordance with its design basis before declaring the surveillance requirement met and returning the sensor to service. This condition shall be dispositioned by the plant’s corrective action program.
- 4 If any as-found calibration setting value is non-conservative with respect to the AV, then the surveillance requirement is not met and the sensor shall be immediately declared inoperable.

### **Item (h) on page 18:**

Item (h) on page 18 does not reflect what is currently in Revision 3 of the DCD for the Bases discussion associated with SR 3.3.1.9.