

## BellBendCOLPEm Resource

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**From:** Canova, Michael  
**Sent:** Friday, May 25, 2012 4:17 PM  
**To:** Sgarro, Rocco R; 'BBNPP@pplweb.com'; 'melanie.Frailer@unistarnuclear.com'; Woodring, Kathryn L; Kirkwood, Jon K  
**Cc:** BellBendCOL Resource; Segala, John; Colaccino, Joseph; Miernicki, Michael; Goldin, Laura; McNally, Richard; Jaffe, David  
**Subject:** RE: Bell Bend COLA - Draft Request for Information No. 117 (RAI No. 117) - EMB2 6291  
**Attachments:** DRAFT RAI Letter 117 - EMB2 6291.doc

Attached is DRAFT RAI No. [117](#) for the Bell Bend COL Application. Please contact me at your earliest convenience to identify whether you need a clarifying conference call prior to issuance of this RAI.

During the call, a schedule for response submittal will also need to be established

If you have any questions, please contact me.

*Michael A. Canova*

Project Manager - Bell Bend COL Application  
Docket 52-039  
EPR Project Branch  
Division of New Reactor Licensing  
Office of New Reactors  
301-415-0737

**Hearing Identifier:** BellBend\_COL\_Public  
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**Subject:** RE: Bell Bend COLA - Draft Request for Information No. 117 (RAI No. 117) - EMB2 6291  
**Sent Date:** 5/25/2012 4:16:50 PM  
**Received Date:** 5/25/2012 4:16:52 PM  
**From:** Canova, Michael

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

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DRAFT RAI Letter 117 - EMB2 6291.doc		33786

**Options**

**Priority:** Standard  
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RAI Letter No. 117

Application Revision 2

5/25/2012

Bell Bend

PPL Bell Bend LLC.

Docket No. 52-039

SRP Section: 03.02.02 - System Quality Group Classification

Application Section: 3.2.2

QUESTIONS for Engineering Mechanics Branch 2 (ESBWR/ABWR Projects) (EMB2)

Request for Additional Information No. 6291

03.02.02-1

EPR Technical Report ANP-10292, "U.S. EPR with Standard Review Plan (NUREG-0800) Technical Report," identifies that EPR is consistent with SRP Criterion 14.3.2 SAC 10 concerning inspection, test, analysis, and acceptance criteria (ITAAC) for the verification of codes and standards for American Society of Mechanical Engineers (ASME) Code Class 1, 2 and 3 systems and no departures are identified in the COLA. NUREG-0800 Section 3.2.2 SRP Section 3.2.2 identifies that, consistent with SECY-93-087, the staff should review applications using the newest codes and standards that have been endorsed by the NRC and unapproved editions will be reviewed on a case by case basis. BBNPP COL FSAR Table 3.2-1 and Subsection 3.2.3 do not define editions for codes and standards or applicable codes and standards for certain SSCs, such as the traveling screens. Clarify which editions of codes and standards apply to the SSCs included in BBNPP COL FSAR Table 3.2-1 and, for SSCs with no commercial codes and standards shown, identify what commercial codes and standards apply. If this information is to be determined later, advise when this information will be available.

03.02.02-2

U. S. EPR Technical Report ANP-10292 identifies that U. S. EPR has ITAAC consistent with SRP Criterion 3.2.2-SAC 02, Criterion 14.3.3-SAC-01 and Criterion 14.3.3-SAC-02 pertaining to quality group classifications, generic piping design ITAAC, and safety classifications. No departures are identified in the COLA from these criteria and site-specific ITAAC are added. ITAAC for site-specific systems and components are included in COLA Part 10 and Subsection 14.3 of the FSAR.

ITAAC are included in the FSAR for as-built inspections of certain important to safety site-specific SSCs including seismic Category I SSCs, certain SSCs that are classified as Seismic Category II and for Seismic Category I structures that could be adversely affected by adjacent NSC structures. For site-specific SSCs that are defined as risk-significant, clarify what ITAAC or DAC is in place to verify that the as-built SSC is consistent with the quality group classification. Also, specifically clarify if there are any important to safety SSCs classified as Seismic Category II or Conventional Seismic (CS) that are not selected for ITAAC and, if so, clarify why an ITAAC is not needed.

#### 03.02.02-3

COL Item 3.2-2 identifies that the COL applicant will identify the quality group classification of applicable site-specific SSCs. Although SRP Section 3.2.2 specifically identifies that structures are excluded from the review, BBNPP COL FSAR Table 3.2-1 identifies quality groups for site-specific SSCs, including structures. RG 1.26 and the U.S. EPR FSAR do not identify quality groups for non-pressure boundary items, such as structures or duct banks. Quality groups are only designated for pressure-retaining components within fluid systems or their supports. Clarify the basis for the quality group designation for structures and other non-pressure-retaining components and what this means in terms of quality to satisfy GDC 1.

#### 03.02.02-4

BBNPP COL FSAR Table 3.2-1 for site-specific SSCs identifies that certain SSCs in important to safety systems such as the screens and miscellaneous piping in the ESWEMS system are classified as Safety Class NS, QG D and Seismic Category II with no 10 CFR 50 Appendix B program applied. RG 1.26 does not assign system quality groups to SSCs such as the screens that are not pressure-retaining components within fluid systems or their supports, but RG 1.29 Regulatory Position 4 identifies that pertinent requirements of Appendix B apply to all activities affecting the safety-related functions of these SSCs. For SSCs in systems that are considered important to safety, such as risk-significant SSCs or those classified as Seismic Category II, clarify the basis for the equipment classification as QG D with no augmented quality requirements rather than NS-AQ (Supplemented Grade) with pertinent quality requirements of the 10 CFR 50 Appendix B program applied.