

## ArevaEPRDCPEm Resource

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**From:** WILLIFORD Dennis (AREVA) [Dennis.Williford@areva.com]  
**Sent:** Friday, July 20, 2012 12:47 PM  
**To:** Tesfaye, Getachew  
**Cc:** BENNETT Kathy (AREVA); DELANO Karen (AREVA); ROMINE Judy (AREVA); RYAN Tom (AREVA); WELLS Russell (AREVA); STACK Tim (AREVA)  
**Subject:** Draft Response to U.S. EPR Design Certification Application RAI No. 549 (6524), FSAR Ch. 13 - NEW PHASE 4 RAI - Fukushima  
**Attachments:** RAI 549 Question 13.03-08 Response US EPR DC - DRAFT.pdf

Getachew,

Attached is a draft response for RAI No. 549, FSAR Ch 13, Question 13.03-8 as shown below in advance of the September 22, 2012 final date.

Let me know if the staff has questions or if this can be sent as a final response.

Thanks,

***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:** WILLIFORD Dennis (RS/NB)  
**Sent:** Monday, June 25, 2012 11:58 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. 549 (6524), FSAR Ch. 13 - NEW PHASE 4 RAI - Fukushima

Getachew,

Attached please find AREVA NP Inc.'s response to the subject request for additional information (RAI). The attached file, "RAI 549 Response US EPR DC.pdf," provides a schedule since a technically correct and complete response to the single question cannot be provided at this time.

The following table indicates the respective pages in the response document, "RAI 549 Response US EPR DC.pdf," that contain AREVA NP's response to the subject question.

Question #	Start Page	End Page
RAI 549 — 13.03-8	2	2

The schedule for a technically correct and complete response to this question is provided below.

Question #	Response Date
RAI 549 — 13.03-8	September 22, 2012

Sincerely,

***Dennis Williford, P.E.***  
***U.S. EPR Design Certification Licensing Manager***  
***AREVA NP Inc.***  
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**From:** Tesfaye, Getachew [<mailto:Getachew.Tesfaye@nrc.gov>]  
**Sent:** Friday, May 25, 2012 7:19 AM  
**To:** ZZ-DL-A-USEPR-DL  
**Cc:** Robinson, Edward; Williams, Kevin; Miernicki, Michael; Segala, John; ArevaEPRDCPEm Resource  
**Subject:** U.S. EPR Design Certification Application RAI No. 549 (6524), FSAR Ch. 13 - NEW PHASE 4 RAI - Fukushima

Attached please find the subject request for additional information (RAI). A draft of the RAI was provided to you on May 18, 2012, and on May 24, 2012, you informed us that the RAI is clear and no further clarification is needed. As a result, no change is made to the draft RAI. 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/LB1  
 (301) 415-3361

**Hearing Identifier:** AREVA\_EPR\_DC\_RAIs  
**Email Number:** 3972

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**From:** WILLIFORD Dennis (AREVA)

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**Response to**

**Request for Additional Information No. 549(6524), Revision 0  
Question 13.03-8**

**5/25/2012**

**U. S. EPR Standard Design Certification**

**AREVA NP Inc.**

**Docket No. 52-020**

**SRP Section: 13.03 - Emergency Planning**

**Application Section: Chapter 13.3 Emergency Planning**

**QUESTIONS for Licensing and Inspection Branch (NSIR/DPR/LIB) (EP)**

**DRAFT**

**Question 13.03-8:****Open Item****New Phase 4 RAI - Fukushima****Implementation of Fukushima Task Force Recommendation 9.3****Regulatory Basis: NUREG-0800, 10 CFR 50.47 (b)(2), 10 CFR 50.47 (b)(6)**

The NRC staff requests that you address provisions for enhancing emergency preparedness as it relates to staffing and communications associated with Recommendation 9.3 outlined in Enclosure 5 of the March 12, 2012 letter "Request for information pursuant to Title 10 of the *Code of Federal Regulations* 50.54(f) regarding Recommendations 2.1, 2.3, and 9.3, of the near-term task force review of insights from the Fukushima Dai-ichi accident." (ML12053A340).

**Response to Question 13.03-8:**

The following includes each of the recommendations in Recommendation 9.3, "Emergency Preparedness," from the NRC letter of March 12, 2012, along with the response provided by AREVA NP:

Communications

1. Addressees are requested to provide an assessment of the current communications systems and equipment used during an emergency event to identify any enhancements that may be needed to ensure communications are maintained during a large scale natural event meeting the conditions described above. The assessment should:
  - a. Identify any planned or potential improvements to existing onsite communications systems and their required normal and/or backup power supplies,
  - b. Identify any planned or potential improvements to existing offsite communications systems and their required normal and/or backup power supplies,
  - c. Provide a description of any new communications system(s) or technologies that will be deployed based upon the assumed conditions described above, and
  - d. Provide a description of how the new and/or improved systems and power supplies will be able to provide for communications during a loss of all ac power,
2. Addressees are requested to describe any interim actions that have been taken or are planned to be taken to enhance existing communications systems power supplies until the communications assessment and the resulting actions are complete.
3. Provide an implementation schedule of the time needed to conduct and implement the results of the communications assessment.

Staffing

1. It is requested that addressees provide an assessment of the onsite and augmented staff needed to respond to a large scale natural event meeting the conditions described above.

This assessment should include a discussion of the onsite and augmented staff available to implement the strategies as discussed in the emergency plan and/or described in plant operating procedures. The following functions are requested to be assessed:

- How onsite staff will move back-up equipment (e.g., pumps, generators) from alternate onsite storage facilities to repair locations at each reactor as described in the Order regarding the NTIF Recommendation 4.2. It is requested that consideration be given to the major functional areas of NUREG-0654, Table 8-1, such as plant operations and assessment of operational aspects, emergency direction and control, notification/communication, radiological accident assessment, and support of operational accident assessment, as appropriate.
  - New staff or functions identified as a result of the assessment.
  - Collateral duties (personnel not being prevented from timely performance of their assigned functions).
2. Provide an implementation schedule of the time needed to conduct the onsite and augmented staffing assessment. If any modifications are determined to be appropriate, please include in the schedule the time to implement the changes.
  3. Identify how the augmented staff would be notified given degraded communications capabilities.
  4. Identify the methods of access (e.g., roadways, navigable bodies of water and dockage, airlift, etc.) to the site that are expected to be available after a widespread large scale natural event.
  5. Identify any interim actions that have been taken or are planned prior to the completion of the staffing assessment.
  6. Identify changes that have been made or will be made to your emergency plan regarding the on-shift or augmented staffing changes necessary to respond to a loss of all ac power, multiunit event, including any new or revised agreements with offsite resource providers (e.g., staffing, equipment, transportation, etc.).

## **AREVA NP Response**

### Communications

The Communication System for the U.S. EPR FSAR is described in U.S. EPR FSAR Tier 2, Section 9.5.2, which states:

“The communication system (COMS) provides reliable and effective communications inside buildings (intra-plant), between buildings (inter-plant), and with external locations (plant-to-offsite) during normal operation, maintenance, transient, fire, accident conditions including loss of offsite power (LOOP) and security-related events.”

Responses to each of the communication recommendations from Recommendation 9.3 are provided as follows:

1a. As noted in U.S. EPR FSAR Tier 2, Section 9.5.2, the COMS consists of the following subsystems:

- Portable wireless communication system.
- Digital telephone system.
- Public address (PA) and alarm system.
- Sound-powered system.
- Emergency offsite communication (see Response to Item 1b).
- Security communication.

Each communication subsystem provides an independent mode of communications. A failure of one subsystem does not affect the capability to communicate via the other subsystem. These diverse communications systems are independent of each other to provide effective communications, including usage in areas exposed to high ambient noise in the plant.

Except for the sound-powered system, which does not require batteries or power supplies, the onsite communication subsystems are powered from the onsite Class 1E emergency uninterruptible power supply (EUPS), which is supported by the emergency and station blackout (SBO) diesel generators to provide backup power. An isolation device is placed between the non-Class 1E COMS system and the Class 1E power supply to provide the required independence per IEEE Std 384-1992. Isolation of the non-safety-related alternating current (AC) sources to the EUPS is also provided as described in U.S. EPR FSAR Tier 2, Section 8.3.1.1.9.

Given the diversity and independence of the on-site COMS, there are no planned or potential improvements to the existing onsite communications systems. Any modifications to the normal and/or backup power supplies needed to accommodate an extended loss of all AC power will be addressed as a part of the response to NTTF recommendation 4.2 (Reference 1).

U.S. EPR FSAR Tier 2, Section 9.5.2.1.3 states that details of emergency response facilities and associated communication capabilities are provided by the COL applicant, as addressed in Sections 9.5.2.1.1 and 13.3. Therefore, as noted in the Staffing Recommendation, which follows, a new COL item will be added to U.S. EPR FSAR Tier 2, Section 13.3 to address staffing and communications capabilities following a large scale natural event resulting in an extended loss of all AC power. I

1b. As noted in U.S. EPR FSAR Tier 2, Section 9.5.2.1.1 and U.S. EPR FSAR Tier 2, Table 1.8-2 (COL Information Item 9.5-21), the COL applicant is responsible for providing a description of the offsite communication system that interfaces with the onsite communication system, including type of connectivity, radio frequency, normal and backup power supplies, and plant security system interface.

U.S. EPR FSAR Tier 2, Section 9.5.2.1.3 states that details of emergency response facilities and associated communication capabilities are provided by the COL applicant as addressed in Sections 9.5.2.1.1 and 13.3. Therefore, as noted in the Staffing Recommendation, which follows, a new COL item will be added to U.S. EPR FSAR Tier 2, Section 13.3 to address staffing and communications capabilities following a large scale natural event resulting in an extended loss of all AC power.

- 1c. Based on the responses to Items 1a and 1b, there are no new communications system(s) or technologies within the scope of the U.S. EPR FSAR that will be deployed.
- 1d. See the responses to Items 1a and 1b.
- 2. Based on the responses to Items 1a and 1b, there are no interim actions required to be taken to enhance existing communications systems power supplies within the scope of the U.S. EPR FSAR.
- 3. Based on the responses to Items 1a and 1b, there are no further communications assessments needed for the U.S. EPR FSAR.

#### Staffing

As noted in U.S. EPR FSAR Tier 2, Section 13.3 and U.S. EPR FSAR Tier 2, Table 1.8-2 (COL Information Item 13.3-1), emergency planning is the responsibility of the COL applicant, with the exception of the non-site specific emergency response facility characteristics and specified permanent communications equipment contained in the U.S. EPR FSAR, Tier 2 Sections 13.3 and 9.5.2.2.1. Therefore, Staffing Recommendations 1 through 6 are the responsibility of the COL applicant.

A COL item will be added to U.S. EPR FSAR Tier 2, Section 13.3 and U.S. EPR FSAR Tier 2, Table 1.8-2 to require the COL applicant to assess the capability of their onsite and augmented staff to respond to a large scale natural event resulting in an extended loss of all AC power, including onsite and offsite communications capabilities.

#### **References:**

- 1. NRC letter dated April 25, 2012, "Implementation of Fukushima Near-Term Task Force Recommendations," Getachew Tesfaye (NRC) to Pedro Salas (AREVA NP).

#### **FSAR Impact:**

U.S. EPR FSAR Tier 2, Section 13.3, and Table 1.8-2 will be revised as described in the response and indicated on the enclosed markup.



# U.S. EPR Final Safety Analysis Report Markups

DRAFT



**Table 1.8-2—U.S. EPR Combined License Information Items**  
**Sheet 34 of 41**

Item No.	Description	Section
12.3-3	A COL applicant that references the U.S. EPR design certification will describe the use of portable instruments, and the associated training and procedures, to accurately determine the airborne iodine concentration within the facility where plant personnel may be present during an accident, in accordance with requirements of 10 CFR 50.34(f)(2)(xxvii) and the criteria in Item III.D.3.3 of NUREG-0737. The procedures for locating suspected high-activity areas will be described.	12.3.4.5
12.3-4	A COL applicant that references the U.S. EPR design certification will maintain dose rates below the administrative limits shown in Table or revise nearby or adjacent radiation zone designations as necessary based on site-specific dose analysis for the areas listed in Table .	12.3.2.3
12.5-1	A COL applicant that references the U.S. EPR design certification will fully describe, at the functional level, elements of the Radiation Protection Program. The purpose of the Radiation Protection Program is to maintain occupational and public doses ALARA. The program description will identify how the program is developed, documented, and implemented through plant procedures that address quality requirements commensurate with the scope and extent of licensed activities. This program will comply with the provisions of 10 CFR Parts 19, 20, 50, 52, and 71 and be consistent with the guidance in RGs 1.206, 1.8, 8.2, 8.4, 8.5, 8.6, 8.7, 8.8, 8.9, 8.10, 8.13, 8.15, 8.27, 8.28, 8.29, 8.34, 8.35, 8.36, 8.38, and the consolidated guidance in NUREG-1736.	12.5
13.1-1	A COL applicant that references the U.S. EPR design certification will provide site-specific information for management, technical support, and operating organizations.	13.1
13.2-1	A COL applicant that references the U.S. EPR design certification will provide site-specific information for training programs for plant personnel.	13.2
13.3-1	A COL applicant that references the U.S. EPR design certification will provide a site-specific emergency plan in accordance with 10 CFR 50.47 and 10 CFR 50 Appendix E.	13.3
<u>13.3-2</u>	<u>A COL applicant that references the U.S. EPR design certification will assess the capability of their onsite and augmented staff to respond to a large scale natural event resulting in an extended loss of all AC power, including onsite and offsite communications capabilities.</u>	<u>13.3</u>
13.4-1	A COL applicant that references the U.S. EPR design certification will provide site-specific information for operational programs and schedule for implementation.	13.4



## 13.3

**Emergency Planning**

A COL applicant that references the U.S. EPR design certification will provide a site-specific emergency plan in accordance with 10 CFR 50.47 and 10 CFR 50 Appendix E. Emergency planning is, in part, within the scope of a COL applicant. Design features, facilities, functions and equipment that are technically relevant to the design and are not site-specific, and which affect some aspect of emergency planning or the capability of a licensee to cope with plant emergencies are described in this section.

A COL applicant that references the U.S. EPR design certification will assess the capability of their onsite and augmented staff to respond to a large scale natural event resulting in an extended loss of all AC power, including onsite and offsite communications capabilities.

A space of at least 1875 ft<sup>2</sup> suitable for a technical support center (TSC), which demonstrates compliance with the design requirements of NUREG-0696, Section 2.4 (Reference 1) for staffing levels of 25 persons (20 utility and 5 NRC) at 75 ft<sup>2</sup> per person, and Revision 1 of NUREG-0654/FEMA REP-1 (Reference 2), is provided within the integrated operations area adjacent to the main control room (MCR). This space is within the Safeguard Building. It is also within the control room envelope (CRE) which maintains habitability during normal, off-normal and emergency conditions; refer to Figure 6.4-1—Control Room Envelope Plan View 1 and Figure 6.4-2—Control Room Envelope Plan View 2. A detailed description of CRE habitability, including radiological protective provisions, is provided in Section 6.4. The control room air conditioning system is described in Section 9.4.1.

Voice communications between the TSC and the plant, local and offsite emergency response facilities, local and state governments and the NRC are provided by the plant telephone, paging and radio systems. These are described in Section 9.5.2.2.1 through Section 9.5.2.2.4.

Data communications within the TSC is provided through the process information and control system (PICS), which is described in Section 7.1.1.3.2. This non-safety related digital I&C system provides a screen-based interface capable of monitoring plant parameters during: normal, off-normal and emergency conditions. It electronically provides MCR safety parameter information to the TSC and to the NRC through the emergency response data system (ERDS). Safety-related information systems are described in detail in Section 7.5, with accident monitoring systems described in Section 7.5.1.2 and information systems provided in the emergency response facilities described in Section 7.5.1.3.

Space suitable for an operational support center (OSC), which demonstrates conformance with the design requirements for staffing levels consistent with current operating practices of NUREG-0654/FEMA REP-1 Revision 1 (Reference 2), is

[Next File](#)