

**From:** Allen, William  
**Sent:** Wednesday, August 22, 2012 4:05 PM  
**To:** Sarah Marshall  
**Cc:** Ireland, JoAnn; Sampson, Michele  
**Subject:** RE: Licensing drawing for comment  
**Attachments:** Dwg. Format Comments.pdf

I apologize for the tardiness of this response. See the attached for comments on the drawing format changes you proposed.

In regards to RAI 1.4, we feel it would be easiest for you to generate two or more tables within the SAR, and your drawings would refer to these tables. The text added to the drawing could read like: "ASME Code Section III is not invoked in its entirety. The ASME Code is applied to each component consistent with the function of the component. Table X lists components important to safety, their function and the governing code. Table Y lists the alternatives to the ASME Code."

We would look for the following types of information in Table X in the SAR: overall, "big picture" components; i.e., the individual seals, plates, etc. do not need to be listed, and the ASME Code Section III, Subsection NB information associated with material procurement, design criteria, stress deformation analysis, welding, inspection and testing. We would look for the following types of information in Table Y: the overall, "big picture" components, the ASME Code Section III, Subsection NB information which is being excepted and the alternative used in place of the excepted ASME Code Section III, Subsection NB.

The following ADAMS accession number will provide examples of tables similar to what we suggest: ML09150454. If you have questions, we can discuss further.

Chris

**From:** Sarah Marshall [<mailto:sarah.marshall@croftltd.com>]  
**Sent:** Wednesday, August 15, 2012 10:27 AM  
**To:** Allen, William  
**Cc:** Bob Vaughan; Flagg, Michael Afton  
**Subject:** Licensing drawing for comment

Morning Chris,

Please see the attached drawing from Croft. As discussed in the meeting on the 7<sup>th</sup> August, could the NRC indicate if this format of drawing would answer query 1.1 of the RAI. With regards to changes to the drawing Table 1 has been added along with note 4. An extra column has also been added to the item list.

With regards to item 1.4 from the RAI, JoAnn indicated in the meeting that she needed to check with colleagues with regards to our proposed response. Has she had an opportunity to do this and would it be possible to get the response?

Thank you,  
Sarah

**Sarah Marshall**

Licensing Engineer

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