

May 10, 2013

MEMORANDUM TO: John Segala, Chief
Licensing Branch 1
Division of New Reactor Licensing
Office of New Reactors

FROM: David H. Jaffe, Senior Project Manager */RA/*
Licensing Branch 1
Division of New Reactor Licensing
Office of New Reactors

SUBJECT: SUMMARY OF THE AUGUST 29, 2012, PUBLIC MEETING WITH
AREVA TO DISCUSS ISSUES RELATED TO TIER 2 STAR AND
INSPECTIONS, TESTS, ANALYSIS AND ACCEPTANCE CRITERIA
(REQUEST FOR ADDITIONAL INFORMATION 469) FOR EPR

On August 29, 2012, the U.S. Nuclear Regulatory Commission (NRC) held a public meeting with representatives of AREVA held at the One White Flint North Building, 11555 Rockville Pike, Room O-16B04, Rockville, MD. The purpose of this public meeting was to discuss issues related to the staff's review of the U.S. EPR Design Certification application, specifically the selection of Tier 2 Star material in the U.S EPR Final Safety Analysis Report (FSAR) and the staff's inspectability concern detailed in Request for Additional Information (RAI) 469, concerning Inspections, Tests, Analyses and Inspection Criteria (ITAAC). The meeting agenda is provided as Enclosure 1 and the meeting attendance list is provided as Enclosure 2. Presentation material distributed at the meeting is available through the Agencywide Documents Access and Management System (ADAMS) and consists of the following documents (presentation slides): "Public Meeting to Discuss U.S. EPR Design Certification Tier 2* Approach," and, "Public Meeting to Discuss Issues Related To U.S. EPR Inspections, Tests, Analyses and Acceptance Criteria (ITAAC) and RAI 469" (ADAMS Accession No. ML122500964)¹.

The meeting was a Category 1 public meeting and lasted from approximately 9:30 A.M. to 4:00 P.M.

The first part of the meeting was directed at discussing comments on a draft of the proposed Tier 2* material² that had been previously made available (ADAMS Accession No. ML12255A425.) The NRC staff indicated that a number of useful interactions between the staff and AREVA had taken place and the staff expects that AREVA will be ready to include Tier 2* material in the next U.S. EPR FSAR revision. Further interaction with the NRC staff may be needed to avoid the issues related to Tier 2* material persisting late into the design certification process.

¹ Documents in ADAMS are available electronically at the NRC Electronic Reading Room at <http://www.nrc.gov/reading-rm/adams.html>. If you do not have access to ADAMS or have problems accessing the documents located in ADAMS, contact the NRC Public Document Room (PDR) staff at 1-800-397-4209, 301-415-4737, or pdr@nrc.gov.

² Tier 2* material appears in the Tier 2 FSAR but requires prior NRC approval to change after the Design Certification or Combined License has been issued.

AREVA provided a presentation to the NRC staff on their closure plan for Tier 2* material. Following the presentation, the NRC staff provided the following observations:

- For FSAR Sections 3.7, “Seismic Design” and 3.8, “Design of Category I Structures,” the staff review was not sufficiently complete to address much attention to Tier 2* material. However, staff noted that material associated with critical sections, Regulatory Guides, load combinations, key material properties, and key concrete and steel dimensions should be included in the Tier 2* material.
- With regard to Codes, Title 10, *Code of Federal Regulations* (10 CFR), Part 50, Section 55a, “Codes and Standards,” allows licensees to use more recent editions of American Society of Mechanical Engineer (ASME Codes) than the edition of reference; therefore, ASME Code editions should not be identified as Tier 2*. There is no similar provision for Concrete and Structural Steel Codes so these Code Editions should be identified as Tier 2*.
- References provide a unique challenge because when an FSAR reference is identified as Tier 2*, the entire reference becomes Tier 2* which may not be warranted. The NRC staff is open to suggestions as to how to treat this issue.
- In FSAR Section 3.2.2, the Tier 2* designation for the Quality Group A through D material is not needed. In addition, Notes 1 through 4 in FSAR Table 3.2.2.1, “Classification Summary,” need not be identified as Tier 2*.
- The Tier 2* material identified for FSAR Chapter 7 is mostly satisfactory. In FSAR Section 7.1.1.3.2, Qualification and Quality requirements should be identified as Tier 2*. In addition, in the FSAR section identified as “Connection between the MSI and the SUs,” the text that identifies the service unit as non-safety-related should be Tier 2*. AREVA indicated that this material should not be Tier 2* because it is already incorporated in Tier 1. AREVA and NRC staff agreed to review the identified material above to determine if it should be Tier 1 or Tier 2*.
- Material related to containment differential pressure, containment high pressure and temperature, containment performance and safety-related ventilation systems should contain Tier 2* material unless already addressed in Tier 1.

The second part of the meeting was directed at discussing comments on an update to the model and non-model ITAAC that had been previously made available to the staff (ADAMS Accession No. ML12345A426.) AREVA provided a presentation to the NRC staff on their approach to resolution of RAI 469 regarding ITAAC inspectability. Following the presentation, the staff provided the following observations:

1. In general, more detail is necessary in the Inspections, Tests and Analyses (ITA) element of ITAAC.

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2. The NRC staff discussed with AREVA the proposed language for ITAAC that verify compliance with ASME Code Section III requirements. The NRC staff provided an example of ASME Code ITAAC language that it developed and that the NRC staff believes is clear, objective, and inspectable.
3. Further dialog between the NRC staff and AREVA on these matters is expected in the future.

Please direct any inquiries concerning this meeting to David H. Jaffe who can be contacted by email at David.Jaffe@nrc.gov or telephone at 301-415-1439.

Docket No.: 52-020

Enclosures:

1. Meeting Agenda
2. Attendee List

cc w/encl: See next page

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2. The NRC staff discussed with AREVA the proposed language for ITAAC that verify compliance with ASME Code Section III requirements. The NRC staff provided an example of ASME Code ITAAC language that it developed and that the NRC staff believes is clear, objective, and inspectable.
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Please direct any inquiries concerning this meeting to David H. Jaffe who can be contacted by email at David.Jaffe@nrc.gov or telephone at 301-415-1439.

Docket No.: 52-020

Enclosures:

3. Meeting Agenda
4. Attendee List

cc w/encl: See next page

DISTRIBUTION:

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ADAMS Accession Nos.: Pkg: ML12345A428

Memo: ML12276A224

Table: ML12345A426

NRC-002

OFFICE	DNRL/NARP: PM	DNRL/NARP: LA	DCIP/CITB: BC	DRNL/NARP: PM
NAME	DJaffe	JMcLellan	MKowal	ASnyder
DATE	12/01/2012	12/10/2012, 05/01/2013	05/ 02/2013	05/09/2013

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MEETING AGENDA FOR AUGUST 29, 2012

PUBLIC MEETING WITH AREVA

TIER 2*/RAI 469

One White Flint North Building, 11555 Rockville Pike, Room O-16B04
Rockville, MD 20852

<u>TIME</u>	<u>TOPIC</u>	<u>LEAD</u>
9:30 A.M.	Introduction and Opening Remarks	NRC/AREVA
9:45 A.M.	AREVA Presentation on Tier 2*	AREVA
10:30 A.M.	Tier 2 Star Discussion	AREVA/NRC
12:00 Noon	Break	
1:00 P.M.	AREVA RAI 469 presentation	AREVA
1:30 P.M.	RAI 469 Presentation	AREVA/NRC
3:45 P.M.	Adjourn	

Note - All times listed are approximate.

MEETING ATTENDANCE FOR AUGUST 29, 2012

TIER 2*/RAI 469 PUBLIC MEETING

	<u>Name</u>	<u>Company/Organization</u>	<u>Contact Info</u>
1	David Jaffe	NRC	david.jaffe@nrc.gov
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30	John McKirgan	NRC	John.McKirgan@nrc.gov

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35	Richard McNally*	NRC	Richard.McNally@nrc.gov

*Attended via telephone conference line

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