

ArevaEPRDCPEm Resource

From: Buckberg, Perry
Sent: Friday, April 26, 2013 11:31 AM
To: WILLIFORD Dennis (AREVA)
Cc: Snyder, Amy; Miernicki, Michael
Subject: FSAR Rev 4 Tier 1 Section 3.9 change

Dennis,

The last change expected to Tier I Section 3.9, ITAAC 2.1 (interim version of FSAR Rev 4 shown below) was as a result of RAI 464 Q#14.03.03-50. FSAR Rev 4 changes to this ITAAC ITAAC were not expected. The three staff comments below are based on the FSAR Rev 4 version of this ITAAC.

- In item a., Under the Inspection, Test, Analysis (ITA) column, it says. "Type tests or analyses or a combination of tests and analyses will be performed on non-Seismic Category I SSC located within a potential impact zone of a Seismic Category I SSC using analytical assumptions, or under conditions, which bound the Seismic **Category II** design requirements."

According to FSAR Section 3.7.3.8, Revision 4, where seismic design requirements are imposed on a non-Seismic Category I SSC, they are Seismic **Category I** design requirements. The non-Seismic Category I system is then classified as Seismic Category II. There are no Seismic Category II design requirements, therefore the last part of this sentence should read ".....which bound Seismic **Category I** design requirements."

- The Acceptance Criteria (AC) for item a. says, "Test/analysis reports conclude that non-Seismic Category I SSC located within a potential impact zone of a Seismic Category I SSC can withstand seismic design basis loads without impairing the ability of SC I SSC to perform their safety function(s)."

Withstanding seismic design loads is not the same thing as being designed to Seismic Category I design requirements. Further, the words without impairing are confusing and un-necessary.

- The ITAAC does not address impact issue (FSAR 3.7.3.8, item 2), which under FSAR Section 3.7.3.8 is acceptable albeit with a number of caveats.

| | | CW | ITA | AC |
|-----|-----|---|---|---|
| 3.9 | 2.1 | M01 3.9 2.1 Non-Seismic Category I SSC located within a potential impact zone of a Seismic Category I SSC will not impair the ability of the Seismic Category I SSC to perform their intended safety function(s). | <p>a. Type tests, analyses, or a combination of type tests and analyses will be performed on non-Seismic Category I SSC located within a potential impact zone of a Seismic Category I SSC using analytical assumptions, or under conditions, which bound the Seismic Category II design requirements.</p> <p>b. An inspection will be performed of the as-built non-Seismic Category I SSC located within a</p> | <p>a. Test/analysis reports conclude that non-Seismic Category I SSC located within a potential impact zone of a Seismic Category I SSC can withstand seismic design basis loads without impairing the ability of the Seismic Category I SSC to perform their intended safety function(s).</p> <p>b. Inspection reports conclude that non-Seismic Category I SSC located within a potential</p> |

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| | | | potential impact zone of a Seismic Category I SSC verify that non-Seismic Category I SSC, including anchorage, are installed per the approved design requirements in a condition bounded by the tested or analyzed condition. | impact zone of a Seismic Category I SSC, including anchorage, are installed per the approved design requirements in a condition bounded by the tested or analyzed condition. |
|--|--|--|--|---|

Thanks,

PERRY BUCKBERG

Senior Project Manager

Nuclear Regulatory Commission

Office of New Reactors

phone: (301)415-1383

fax: (301)415-6406

perry.buckberg@nrc.gov

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Created By: Perry.Buckberg@nrc.gov

Recipients:

"Snyder, Amy" <Amy.Snyder@nrc.gov>

Tracking Status: None

"Miernicki, Michael" <Michael.Miernicki@nrc.gov>

Tracking Status: None

"WILLIFORD Dennis (AREVA)" <Dennis.Williford@areva.com>

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