

## ArevaEPRDCPEm Resource

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**From:** Buckberg, Perry  
**Sent:** Thursday, May 02, 2013 9:57 AM  
**To:** WILLIFORD Dennis (AREVA)  
**Cc:** LENTZ Tony (EXTERNAL AREVA); Snyder, Amy; GUCWA Len (EXTERNAL AREVA)  
**Subject:** April 4-5 public meeting on ITAAC - Follow up comments Set 2

Dennis,

This set of follow-up comments (titled 'Set 2') replaces the follow-up comments sent to you on 4/24/13 at 7:41 AM (or clarifies the 4/24 comments - whichever you prefer).

### Summary:

- The Section Tier 1, Section **2.8.1** comment from 4/24 still stands.
- Disregard the Tier 1 Section **2.2.1** comment from 4/24. Retain the interim version of this ITAAC as agreed during the April public meeting (in ML13101A075).
- Replace the Tier 1, Section **2.2.1** ITAACs **3.15** & **3.16** with the versions shown below. This is to be consistent with the other ITAACs, and to allow closure of ITAAC for Core supports before other ASME Code components.

### ITAAC Comments:

Tier 1 Section **2.8.1**, ITAAC 2.4: The AC column should read:

A report exists and concludes that the as-built turbine rotor meets the requirements of the manufacturer's turbine missile probability analysis:

- (1) turbine material property data, rotor and blade design analyses (including loading combinations, assumptions and warm-up time) demonstrating safety margin to withstand loadings from overspeed events, and
- (2) the results of pre-service inspection and testing, and the requirements for inservice inspection and testing.

Tier 1 Section **2.2.1**, ITAAC 3.30:

~~Add Class "CS" to Commitment and AC columns to read "ASME Code Class 1, 2, 3 and CS components....." This is needed to include the CS components that are currently listed in table 2.2.1-1 to verify that they are fabricated, installed, and inspected in accordance with ASME Code Section III requirements.~~

<u>Section</u>	<u>ITAAC</u>	<u>Commitment:</u>	<u>ITA:</u>	<u>AC:</u>
<b>2.2.1</b>	<b>3.15</b>	As-built RPV internals listed as ASME Code Section III in Table 2.2.1-1 are reconciled with the design requirements.	A reconciliation analysis of RPV internals listed as ASME Code Section III in Table 2.2.1-1 will be performed.	ASME Code Design Report(s) exist that meet the requirements of NCA-3550, conclude that the design reconciliation has been completed for the as-built RPV internals listed as ASME Code Section III in Table 2.2.1-1, and document that the results of the reconciliation analysis comply with the requirements of ASME Code Section III, Subsection NG.
<b>2.2.1</b>	<b>3.16</b>	As-built RPV internals	An inspection of	ASME Code Data Report(s) exist

		listed as ASME Code Section III in Table 2.2.1-1 are fabricated, installed, and inspected in accordance with ASME Code Section III requirements.	the as-built construction activities and documentation for RPV internals listed as ASME Code Section III in Table 2.2.1-1 will be conducted.	that conclude that RPV internals listed as ASME Code Section III in Table 2.2.1-1 are fabricated, installed, and inspected in accordance with ASME Code Section III, Subsection NG.
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**Note** - The staff is still working on additional follow-up comments related to ASME Code ITAAC.

**Note** - Specific ITAAC updates may be still required as technical issues are resolved and FSAR Tier II changes continue to be made.

Thanks,

**PERRY BUCKBERG**

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**From:** GUCWA Len (EXTERNAL AREVA) [<mailto:Len.Gucwa.ext@areva.com>]

**Sent:** Friday, April 05, 2013 12:02 PM

**To:** Snyder, Amy; Buckberg, Perry

**Cc:** WILLIFORD Dennis (AREVA); LENTZ Tony (EXTERNAL AREVA)

**Subject:** April 4-5 public meeting on ITAAC

Amy and Perry:

As requested, attached are documents discussed during the subject public meeting with changes incorporated.

Thanks,

Len Gucwa, P.E.  
404-673-2739 cell

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**From:** Buckberg, Perry

**Created By:** Perry.Buckberg@nrc.gov

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Tracking Status: None

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