

## ArevaEPRDCPEm Resource

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**From:** RYAN Tom (AREVA) [Tom.Ryan@areva.com]  
**Sent:** Wednesday, March 05, 2014 9:25 AM  
**To:** Wunder, George  
**Cc:** KOWALSKI David (AREVA); HOTTLE Nathan (AREVA); GUCWA Len (EXTERNAL AREVA); UYEDA Graydon (AREVA); RANSOM Jim (AREVA); LEIGHLITER John (AREVA); WILLIFORD Dennis (AREVA); ROMINE Judy (AREVA); DELANO Karen (AREVA); WILLS Tiffany (AREVA); BALLARD Bob (AREVA); Hearn, Peter  
**Subject:** Response to US EPR FINAL RAI letter 620 RAI 725  
**Attachments:** RAI 620 Response US EPR DC.pdf

George,

Attached please find AREVA Inc.'s response to the subject request for additional information (RAI). The attached file, "RAI 620 Response US EPR DC.pdf," provides a schedule since a technically correct and complete response to the question cannot be provided at this time.

The following table indicates the respective pages in the response document, "RAI 620 Response US EPR DC.pdf" that contain AREVA Inc.'s response to the subject question.

Question #	Start Page	End Page
RAI 620 – 09.01.05-25	2	3

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

Question #	Advanced Response Date	NRC Comment Request Date	Response Date
RAI 620 – 09.01.05-25	February 27, 2015	March 13, 2015	April 24, 2015

Sincerely,

**Tom Ryan**

Manager, US EPR DCD

Regulatory Affairs

**AREVA**

7207 IBM Drive - CLT2B

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**From:** Wunder, George [<mailto:George.Wunder@nrc.gov>]  
**Sent:** Monday, February 03, 2014 12:47 PM  
**To:** ZZ-DL-A-USEPR-DL  
**Cc:** Hearn, Peter; ArevaEPRDCPEm Resource  
**Subject:** US EPR FINAL RAI letter 620 RAI 725 - RE-SENT WITH CORRECT ATTACHMENT

Attached please find the subject requests for additional information (RAI). A draft of the RAI was provided to you on November 7, 2013, and discussed with your staff on or about February 3, 2008. The schedule we have established for review of your application assumes technically correct and complete responses within 30 days of receipt of RAIs,

Sincerely,

George Wunder, Senior Project Manager  
Office of New Reactors

**Hearing Identifier:** AREVA\_EPR\_DC\_RAIs  
**Email Number:** 4826

**Mail Envelope Properties** (88F9B30A3139B1498DA89BEBA7B31B900B73BC0E)

**Subject:** Response to US EPR FINAL RAI letter 620 RAI 725  
**Sent Date:** 3/5/2014 9:25:17 AM  
**Received Date:** 3/5/2014 9:25:21 AM  
**From:** RYAN Tom (AREVA)

**Created By:** Tom.Ryan@areva.com

**Recipients:**

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Tracking Status: None

**Post Office:** FUSLYNCMX03.fdom.ad.corp

Files	Size	Date & Time
MESSAGE	1740	3/5/2014 9:25:21 AM
RAI 620 Response US EPR DC.pdf		63460

**Options**

**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**

**Response to**

**Request for Additional Information No.620**

**02/03/2014**

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

**AREVA Inc.**

**Docket No. 52-020**

**SRP Section: 09.01.05 - Overhead Heavy Load Handling Systems**

**Application Section: 9.1.5**

**Question 09.01.05-25:**

In accordance with 10 CFR50 Appendix A and GDC 1, OHLHS and equipment in and around the area of the OHLHS should be properly designed, fabricated, and installed to reduce the likelihood of a single failure. A failure that could cause the release of radioactive materials from damaged irradiated fuel, a criticality accident, or damage to essential safe-shutdown equipment could cause unacceptable radiation exposures.

Based on the staff's review of US-EPR FSAR Revision 5, the following questions are needed related to the Heavy Load Handling.

1. Table 9.1.5-1 includes a listing of the primary HLHE which are located in areas containing safety-related equipment that could be potentially impacted by drops of heavy loads. Since these cranes are located in areas containing safety related equipment, the staff needs to verify their classification. However, details of some cranes are not found. Please address the following:

- a. Table 3.2.2-1 refers to "Auxiliary Crane" and Table 9.1.5-1 referring to "Fuel Building Auxiliary Crane". Confirm these are referencing the same component and reword for consistently.
- b. Table 3.2.2-1 refers to "Outdoor Crane" and Table 9.1.5-1 refers to "Gantry Crane" located outside fuel building. Confirm these are referencing the same component and reword for consistently.
- c. Table 9.1.5-1 shows a "Decontamination Area Crane". Clarify where this crane classification is located in Table 3.2.2-1.

GDC 4 requires protection for SSCs important to safety against the effects of internally-generated missiles. GDC 4 applies to SRP Section 9.1.5 because GDC 4 specifies protection against the effects of internally-generated missiles (i.e., dropped loads). A dropped heavy load in a critical area could cause a release of radioactive materials, a criticality accident, or inability to cool fuel within the reactor vessel or spent fuel pool or could prevent safe shutdown of the reactor.

2. The statement found in RAI 9.1.5-24 and RAI 9.1.4-26 response, and FSAR (Rev 5) Section 9.1.5.2.4 appears inaccurate. FSAR Section 9.1.5.2.4 states:

"Design of these devices, in accordance with ASME NOG-1, ensures that the criteria specified in CMAA-70, 2000 and ASME B30.2-2005 is satisfied."

The staff understands CMAA 70 and ASME NOG-1 are design standards and do overlap. However, ASME B30.2 includes a small amount of design information, but it also includes operational, maintenance, and testing/inspection attributes that are not in the other standards. Therefore, the staff requests Areva to provide additional details to justify how meeting NOG-1 ensures B30.2 is met.

3. The statements found in RAI 9.1.5-24 response and FSAR Revision-5 seems contradictory. It is unclear to the staff whether ANSI N14.6 is applicable to the SFCTF components. FSAR Section 9.1.5.2.4 contains both of the following statements:

"These lifting devices are not conventional cranes, but components of these devices are designed per the guidance of ASME NOG-1 for Type I cranes and ANSI N14.6-2004 (Reference 9)."

"Since these lifting devices do not require the use of special below the hook lifting devices, the criteria of ANSI N14.6 and ASME 30.9, for below the hook lifting devices, do not apply."

Provide additional details regarding application of ANSI N14.6

**Response to Question 09.01.05-25:**

A response to this question will be provided by April 24<sup>th</sup>, 2015.