

ArevaEPRDCDocsPEm Resource

From: Wunder, George
Sent: Tuesday, March 11, 2014 12:05 PM
To: ArevaEPRDCDocsPEm Resource
Subject: FW: Key Issues Discussed at the EPR/NRC Staff March 5, 2014 Public Meeting

From: HONMA George (EXTERNAL AREVA) [<mailto:George.Honma.ext@areva.com>]
Sent: Tuesday, March 11, 2014 9:50 AM
To: Clark, Phyllis
Cc: GUCWA Len (EXTERNAL AREVA); HOTTLE Nathan (AREVA); RANSOM Jim (AREVA); MCFARLAND Mitch (AREVA); HONMA George (EXTERNAL AREVA); RINCKEL Mark (AREVA); Wunder, George
Subject: RE: Key Issues Discussed at the EPR/NRC Staff March 5, 2014 Public Meeting

Phyllis,

As discussed earlier, please provide us with an updated draft RAI 625 that incorporates comments from our March 5 meeting.

Also, we will provide you with our position paper that provides assessment of Table 2.1-2, "Bounding Values for Component Radionuclide Inventory" per Item 7 below. This should be available for your review by Thursday, March 13. Upon your review, we can determine if a public conference call is still warranted on Monday, March 17 for further discussion.

With respect to completing your work and issuance of Tier 1/ITAAC RAI (i.e., new RAI), AREVA request that you hold off on continuing this effort and issue this new RAI once we resume work for Group B/C Chapters.

Thanks for your support,
George Honma
AREVA Licensing
(360) 981-0640

From: Clark, Phyllis [<mailto:Phyllis.Clark@nrc.gov>]
Sent: Tuesday, March 11, 2014 7:47 AM
To: HONMA George (EXT)
Cc: GUCWA Len (External AREVA INC); RYAN Tom (RS/NB); HOTTLE Nathan (EP/PE); Wunder, George
Subject: REF: Key Issues Discussed at the EPR/NRC Staff March 5, 2014 Public Meeting
Importance: High

George,

Listed below are the key issues discussed during the Chapter 11 public meeting with AREVA March 5, 2014. Please let me know if you have any comments or questions.

1. As a result of discussions on Tier 2 FSAR sections, there is no need for the staff to issue any new RAIs on Chapter 11 and 12 systems and review interfaces of other systems.
2. With respect to pending Tier 1 and FSAR Tier 2, Sections 11.2 to 11.5 issues (as noted in RAI 625 and open RAI 557 and 527), AREVA will inform DNRL as to whether the staff can prepare a Tier 1 RAI for those systems and components based on FSAR Rev. 5. The objective of this RAI would be to update the status of Tier 1 RAIs on Chapters 11 and 12 systems and supersede/incorporate earlier RAIs issued on prior versions of the FSAR, Rev. 1, 2, and 3, Tier 1 and 2 information. The issuance of an updated Tier 1 RAI based on FSAR Rev. 5 would facilitate AREVA's efforts in capturing remaining staff issues and provide the means to prepare responses that are better integrated in their technical and regulatory context.
3. With respect to the closure of RAIs on FSAR Chapter 10 (Group A closure plan), the staff pointed that AREVA should integrate its evaluation and responses associated with RAI 610 (Group A chapter, 2nd Qtr 2014) with that of future responses to RAI 554, 557, and 625 (Group C chapters, 3rd Qtr 2015). The objective is to ensure that in closing out RAI 610 issues (Group A chapter), there will not be a need to revisit the earlier closure of RAI 610 on FSAR Section 10.4.8 once the staff evaluates responses to RAI 554, 557, and 625.
4. Based on AREVA's presentation, the staff noted that the proposed resolution would invoke certain provisions of RG 1.97, Rev. 3 - for example see Slide 14. However, the staff noted that FSAR Rev. 5, Tables 1.9-2 and FSAR Sections 7.1 and 7.5 endorse only Rev. 4 of that RG. Moreover, FSAR Table 7.1-2 (sheet 5) does not identify the applicability of RG 1.97 to any radiation monitoring systems. The staff urged AREVA staff to review and properly assign RG 1.97 guidance in supporting the design basis of selected radiation monitoring instrumentation in subsequent FSAR revisions.
5. In response to topics presented in Slides 10, 11, 12, and 15, the staff expressed some reservations about the use of uCi, DAC-hours, and rad/hr for radiation monitoring instrumentation that measure airborne radioactivity in exhaust ventilation ductwork and plant stack. For illustrative examples and technical rationale for the staff's concerns, see RAI 625, Items 3.b, 4.b, 7.g, or 8.e, among others. The staff's position is that for the purpose of FSAR Tables 11.5-1 and 12.3-4 and in demonstrating regulatory compliance, the description of operational ranges should be expressed in units of airborne concentration, uCi/mL. As presented in FSAR Rev. 5, neither Chapter 11 or 12 present technical information and assumptions that support the basis of radiological units expressed in "uCi," "DAC-hours," and "rad/hr." The staff urged Areva to review and consider the use of such radiological units and provide supplementary information.
6. In clarifying and resolving inconsistencies in the assignment of ITP test abstracts, AREVA proposed an approach that would remove all citations of test abstracts from the first column of FSAR Table 11.5-1 and add new subsections in FSAR Section 11.5, namely FSAR Sections 11.5.3.3 and 11.5.4.19. While not noted in the handout, Areva stated that a parallel subsection would be developed and added to FSAR Chapter 12 for instrumentation systems listed in FSAR Tables 12.3-3 and 12.3-4. While the staff recognizes the benefit of removing duplicative and redundant information, the FSAR should contain clear and concise technical details in confirming that such tests have been successfully completed, are readily inspectable, and compliance with test objectives and test acceptance criteria are demonstrable with no ambiguity.
7. With respect to the radionuclides and inventories listed in FSAR Table 2.1-2 (Bounding Values for Component Radionuclide Inventory), the staff asked AREVA, once it completes its response to RAI 554, Question 11.02-27, to confirm that the listed data set is still representative and bounding. If needed, AREVA should revise the listing in FSAR Table 2.1-2 using data presented in the next revision of FSAR Sections 12.2 and 11.2.3.7 and Table 11.2-8. In addition, AREVA's preliminary assessment on the impact on Chapter 2 (Table 2.1-2) will be needed prior to the completion of their response to RAI 554, Question 11.02-27. AREVA will inform the staff at the March 10th or March 17th Group A public meeting of any potential impacts to Chapter 2.

Thanks,

Phyllis

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Subject: FW: Key Issues Discussed at the EPR/NRC Staff March 5, 2014 Public Meeting
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