

## ArevaEPRDCDocsPEm Resource

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**From:** Wunder, George  
**Sent:** Thursday, March 13, 2014 5:51 PM  
**To:** ArevaEPRDCDocsPEm Resource  
**Subject:** FW: Key Issues Discussed at the EPR/NRC Staff March 5, 2014 Public Meeting

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**From:** Clark, Phyllis  
**Sent:** Thursday, March 13, 2014 5:33 PM  
**To:** HONMA George (EXTERNAL AREVA)  
**Cc:** GUCWA Len (EXTERNAL AREVA); HOTTLE Nathan (AREVA); MCFARLAND Mitch (AREVA); MCFARLAND Mitch (AREVA); RANSOM Jim (AREVA); UYEDA Graydon (AREVA); SEALS Jeff (AREVA); Wunder, George; Segala, John  
**Subject:** RE: Key Issues Discussed at the EPR/NRC Staff March 5, 2014 Public Meeting

George,

The Chapter 2 technical reviewers may not be able to attend. However, the Chapter 11 and 12 reviewers who originally had the question will be there. Please let me know if you have any questions.

Phyllis

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**From:** HONMA George (EXTERNAL AREVA) [<mailto:George.Honma.ext@areva.com>]  
**Sent:** Thursday, March 13, 2014 9:03 AM  
**To:** Clark, Phyllis  
**Cc:** GUCWA Len (EXTERNAL AREVA); HOTTLE Nathan (AREVA); MCFARLAND Mitch (AREVA); MCFARLAND Mitch (AREVA); RANSOM Jim (AREVA); UYEDA Graydon (AREVA); SEALS Jeff (AREVA); HONMA George (EXTERNAL AREVA)  
**Subject:** RE: Key Issues Discussed at the EPR/NRC Staff March 5, 2014 Public Meeting

Phyllis,

We will be ready to discuss this topic on Monday's scheduled public meeting. On Friday, I will send you the "talking points" of the discussion for Monday. Can you also advise me who you expect from the staff that will be on the call Monday to support this discussion. We want to make sure that we address all of your comments/concerns relative to FSAR Chapter 2, Table 2.1-2 at this call.

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

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**From:** Clark, Phyllis [<mailto:Phyllis.Clark@nrc.gov>]  
**Sent:** Thursday, March 13, 2014 8:39 AM  
**To:** HONMA George (EXT)  
**Cc:** GUCWA Len (External AREVA INC); HOTTLE Nathan (EP/PE); MCFARLAND Mitch (EP/PE); MCFARLAND Mitch (EP/PE); RANSOM Jim (RS/NB)  
**Subject:** RE: Key Issues Discussed at the EPR/NRC Staff March 5, 2014 Public Meeting  
**Importance:** High

George,

We will need to have this discussion during the regularly scheduled Monday public meeting (Monday, 3/17/2014, at 2:00 p.m.). Please let me know if AREVA will be available Monday, 3/17/2014 at 2 p.m.

Thanks,

Phyllis

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**From:** HONMA George (EXTERNAL AREVA) [<mailto:George.Honma.ext@areva.com>]

**Sent:** Wednesday, March 12, 2014 11:48 AM

**To:** Clark, Phyllis

**Cc:** GUCWA Len (EXTERNAL AREVA); HOTTLE Nathan (AREVA); MCFARLAND Mitch (AREVA); MCFARLAND Mitch (AREVA); RANSOM Jim (AREVA); HONMA George (EXTERNAL AREVA)

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

**Importance:** High

Phyllis,

I left you a message on your phone. Per our earlier discussion, we are preparing a position paper to address Item 7 below. The position paper will provide discussion of why Chapter 2, Table 2.1-2, "Bounding Values for Component Radionuclide Inventory" will still be representative and bounding. This is planned to be transmitted to you on Thurs.

Sorry for the short notice but can you check with Jean-Claude to see if you can support a conf call on Friday to discuss Item 7 below so we can close-out this issue. I don't it will take more than 1 hr time to cover this task. Please advise me with the available times.

Thanks for your support,

George Honma

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(360) 981-0640

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**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, 2<sup>nd</sup> Qtr 2014) with that of future responses to RAI 554, 557, and 625 (Group C chapters, 3<sup>rd</sup> 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 10<sup>th</sup> or March 17<sup>th</sup> Group A public meeting of any potential impacts to Chapter 2.

Thanks,

Phyllis



**Hearing Identifier:** AREVA\_EPR\_DC\_Docs\_Public  
**Email Number:** 128

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**Subject:** FW: Key Issues Discussed at the EPR/NRC Staff March 5, 2014 Public Meeting  
**Sent Date:** 3/13/2014 5:50:50 PM  
**Received Date:** 3/13/2014 5:50:51 PM  
**From:** Wunder, George

**Created By:** George.Wunder@nrc.gov

**Recipients:**  
"ArevaEPRDCDocsPEm Resource" <ArevaEPRDCDocsPEm.Resource@nrc.gov>  
Tracking Status: None

**Post Office:** HQCLSTR02.nrc.gov

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
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**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**