

PMComanchePeakPEm Resource

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Subject: 2009-07-14 RAI #10, Question 09.05.01-2 Clarification
Attachments: RAI 2328 (RAI 10).doc

Steve,

I would like some clarification on the subject question. I don't think I need a conference call. As I read the question and checked the COL application, the matter seems to be addressed in the QAPD which is in Part 11, "COLA Enclosures," of the COLA. We are preparing a response that directs the reviewer to the QAPD. Did the reviewer see the QAPD and believes more is required or did the reviewer not find the QAPD (the path to get there is not direct but goes through FSAR Chapter 17)?

Please check with the reviewer and give me a call or an email. If we need a conference call I can support that. Maybe we can discuss before or after the DCWG meeting.

Thanks,

D. R. Woodlan

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Hearing Identifier: ComanchePeak_COL_Public
Email Number: 378

Mail Envelope Properties (4C66789B9B144E42B3FBCAD7B9C908A701A810CE)

Subject: 2009-07-14 RAI #10, Question 09.05.01-2 Clarification
Sent Date: 7/14/2009 5:21:39 PM
Received Date: 7/14/2009 5:22:16 PM
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Post Office: MDCTXUEXCL01N2.corptxu.txu.com

Files	Size	Date & Time
MESSAGE	1414	7/14/2009 5:22:16 PM
RAI 2328 (RAI 10).doc	46144	

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Priority: Standard
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Recipients Received:

Request for Additional Information (RAI) No. 2328

RAI No. 10

6/30/2009

Comanche Peak Units 3 and 4
Luminant Generation Company, LLC.
Docket No. 52-034 and 52-035
SRP Section: 09.05.01 - Fire Protection Program
Application Section: 9.5.1

QUESTIONS for Fire Protection Team (SFPT)

09.05.01-1

Please revise the Comanche Peak Nuclear Power Plant (CPNPP) Final Safety Analysis Report (FSAR) Subsection 9.5.1.6.2.1.5 to clarify that fire protection training records will be kept for at least 3 years and be available for NRC inspection, as stated in Table 9.5.1-1R, position number 1.6.4.4.

09.05.01-2

Please revise the CPNPP FSAR Subsection 9.5.1.6 and/or FSAR Chapter 17 to provide a description of the quality assurance (QA) plan for fire protection (FP) systems or program as stated in Table 9.5.1-1R. Subsection 9.5.1.6.5 of the FSAR states that the QA program for FP is addressed under QA program reference in FSAR Chapter 17, but FSAR Chapter 17 does not contain a specific description of the fire protection QA program. The applicant should include the detailed descriptions of this QA program in a future revision of the FSAR. Regulatory Guide (RG) 1.189, Revision 1 (March 2007) Regulatory Position 1.7, "Quality Assurance," provides guidance as to what the plant's overall QA plan should include for fire protection.

09.05.01-3

Please revise the CPNPP FSAR Subsection 9.5.1.6 to include a description of the FP program change procedures as stated in Table 9.5.1-1R. RG 1.189, Regulatory Position 1.8.1.3 provides guidance as to the information the applicant should include in a future revision of this subsection to the FSAR.

09.05.01-4

Please revise the CPNPP FSAR Subsection 9.5.1.6 to describe the FP program record maintenance procedures, as stated in Table 9.5.1-1R. RG 1.189, Regulatory Position 1.8.1.5 provides guidance as to the information the applicant should include in a future revision of this subsection of the FSAR.

09.05.01-5

Please review CPNPP FSAR Subsection 9.5.1.6, to describe the requirements the applicant must meet when the applicant opts not to change or modify the FP program without seeking prior NRC approval, as stated in Table 9.5.1-1R. RG 1.189, Regulatory Position 1.8.3, provides guidance as to the information the applicant should provide in a future revision of this subsection of the FSAR.

09.05.01-6

Please revise the CPNPP FSAR, Subsection 9.5.1.6, to include a description of the FP program reporting procedures in accordance with 10 CFR 50.72 and 10 CFR 50.73, as stated in Table 9.5.1-1R. RG 1.189, Regulatory Position 1.8.5, provides guidance as to the information the applicant should provide in a future revision of this subsection of the FSAR.

09.05.01-7

Please revise the CPNPP FSAR, Subsection 9.5.1.1, to include a description of the deviation from the National Fire Protection Association (NFPA) codes and standards, as stated in Table 9.5.1-1R. RG 1.189, Regulatory Position 1.8.6 provides guidance as to the information the applicant should include in a future revision of this subsection of the FSAR.

09.05.01-8

RG 1.189, Regulatory Position 2.1.1, states that unused ion exchange resins and hazardous chemicals should not be stored in areas that contain or expose equipment important to safety. Please revise the CPNPP FSAR Subsection 9.5.1.6.4.2.4, to clarify whether storage of unused ion exchange resins or hazardous chemicals and/or any other combustible materials will be permitted in safety-related areas and describe what, if any, effective administrative controls exist for such storage. Please also provide justification for allowing storage of these types of materials in safety-related equipment, and demonstrate why this is an acceptable deviation from the regulatory guide.

09.05.01-9

Please revise the CPNPP FSAR Subsection 9.5.1.6, to include a description of the modification review procedure for the FP program, as stated in Table 9.5.1-1R. RG 1.189, Regulatory Position 2.1.2, provides guidance as to the information the applicant should provide in a future revision of this subsection of the FSAR.

09.05.01-10

Please revise CPNPP FSAR, Subsection 9.5.1.6, to clarify whether the FP program complies with NFPA 30 standards for the use, handling, and storage of flammable and combustible liquids, as stated in Table 9.5.1-1R.

RG 1.189, Regulatory Position 2.1.3, provides guidance as to the information the applicant should provide in a future revision of this subsection of the FSAR.

09.05.01-11

Please revise the CPNPP FSAR, Subsection 9.5.1.6, to include a description of the fire risk evaluation procedure, as stated in Table 9.5.1-1R. RG 1.189, Regulatory Position 2.1.4, provides guidance as to the information the applicant should provide in a future revision of this subsection of the FSAR.

09.05.01-12

Please revise the CPNPP FSAR Subsection 9.5.1.6, to include a detailed description of the ignition sources control procedures, as stated in Table 9.5.1-1R. RG 1.189, Regulatory Position 2.2, provides guidance as to the information the applicant should provide in a future revision of this subsection of the FSAR.

09.05.01-13

Please revise the CPNPP FSAR Subsection 9.5.1.6.4.2.4, to include provisions for the removal of waste, debris, scrap, and oil spills resulting from work activities in safety-related areas upon completion of the work activity or at the end of each shift. RG 1.189, Regulatory Position 2.3, provides guidance as to the information the applicant should provide in a future revision of this subsection of the FSAR.

09.05.01-14

Please revise the CPNPP FSAR Subsection 9.5.1.6, to include a detailed description of the fire protection administration control procedures, as stated in Table 9.5.1-1R. RG 1.189, Regulatory Position 2.4, provides guidance as to the information the applicant should provide in a future revision of this subsection to the FSAR.

09.05.01-15

Please revise the CPNPP FSAR Subsection 9.5.1.2.2 to clarify whether the CPNPP the FP water storage tanks will be designed based on NFPA 22. If so, please include NFPA 22, "Standard for Water Tanks for Private Fire Protection," in the reference section. If not, please justify the deviation from this standard for FP water storage tanks. RG 1.189, Regulatory Position 3.2.1, provides guidance as to the information the applicant should provide in a future revision of this subsection of the FSAR.

09.05.01-16

If one of the references for the FP portable fire extinguishers was NFPA 10, "Standard for Portable Fire Extinguishers," please revise the reference section of subsection, 9.5.10 of the FSAR to include this reference.

RG 1.189, Regulatory Position 3.4.4, provides guidance as to the information the applicant should provide in a future revision of this subsection of the FSAR.

09.05.01-17

Please revise the CPNPP FSAR, Subsection 9.5.1.6.1.8, to include a description of the requirement for the fire brigade leader to have keys for locked doors as stated in Table 9.5.1-1R, and describe how this requirement will be met. RG 1.189, Regulatory Position 3.5.1, provides guidance as to the information the applicant should provide in a future revision of this subsection of the FSAR.

09.05.01-18

Please revise the CPNPP FSAR Subsection 9.5.1.6.1.8, "Fire Brigade Equipment," to clarify whether at least 10 self-contained breathing apparatus (SBA) masks are available for fire brigade use. Please also clarify whether each SBA will be provided with an additional 1-hour supply of breathing air in extra bottles, and whether there will be an on-site 6-hour supply of reserve air to provide for quick and complete replenishment of exhausted breathing air bottles. Please also revise this subsection, so that it includes, descriptions of the portable emergency communications equipment and portable lighting that are parts of the fire brigade equipment requirement.

RG 1.189, Regulatory Position 3.5.1.2, provides guidance as to the information the applicant should provide in a future revision of this subsection of the FSAR.

09.05.01-19

Please revise the CPNPP FSAR, Subsection 9.5.1.6, to include a description of the explosion hazards control measures that will be implemented at CPNPP, as stated in Table 9.5.1-1R. RG 1.189, Regulatory Position 4.1.8, provides guidance as to the information the applicant should provide in a future revision of this subsection of the FSAR.

09.05.01-20

Please revise the CPNPP FSAR Subsection 9.5.1.6, to include a description of the fire protection features that will be implemented at CPNPP in new fuel areas, as stated in Table 9.5.1-1R. RG 1.189, Regulatory Position 6.2.1, provides guidance as to the information the applicant should provide in a future revision of this subsection of the FSAR.