

CCNPP3eRAIPEm Resource

From: Arora, Surinder
Sent: Thursday, October 30, 2014 12:38 PM
To: 'Mark.T.Finley@unistarnuclear.com'
Cc: CCNPP3eRAIPEm Resource; Wilson, Anthony; Eudy, Michael; Lee, Pete; Segala, John; Huyck, Doug; McLellan, Judith
Subject: CCNPP3 - Draft RAI 428 NSIR RSPLB 7713
Attachments: DRAFT RAI 428 NSIR RSPLB 7713.docx

Mr. Finley,

Attached is DRAFT RAI No. 428 (eRAI 7713) related to Calvert Cliffs Unit 3 FSAR Chapter 13. The RAI question specifically pertains to the information provided in Part 2 of Revision 10 of the CCNPP3 COL application in Chapter 13 FSAR. You have until November 14, 2014 to review the draft question and request a clarification phone call to discuss the RAI before the final issuance. After the clarification phone call or after November 14, 2014, this draft RAI will be finalized and sent to you for your response. You will then have 30 days to provide a technically complete response or an expected response date for the RAI.

Please note that the time durations listed above are our normal time durations. However, due to the fact that Chapter 13 is in your Group A Chapters category in accordance with your May 30th letter, it is highly recommended that you take expeditious action in responding to this RAI so that the staff's reviews continue without interruptions. Any interruptions could have detrimental impact on our review schedule for this chapter.

Thanks,

SURINDER ARORA, PE
LEAD PROJECT MANAGER,
CALVERT CLIFFS U3 COLA PROJECT
Office of New Reactors
US Nuclear Regulatory Commission

Phone: 301 415-1421
FAX: 301 415-6406
Email: Surinder.Arora@nrc.gov

Hearing Identifier: CalvertCliffs_Unit3Col_RAI
Email Number: 405

Mail Envelope Properties (B46615B367D1144982B324704E3BCEED0187DEAA3D1C)

Subject: CCNPP3 - Draft RAI 428 NSIR RSPLB 7713
Sent Date: 10/30/2014 12:37:55 PM
Received Date: 10/30/2014 12:37:57 PM
From: Arora, Surinder

Created By: Surinder.Arora@nrc.gov

Recipients:

"CCNPP3eRAIPEm Resource" <CCNPP3eRAIPEm.Resource@nrc.gov>
Tracking Status: None
"Wilson, Anthony" <Anthony.Wilson@nrc.gov>
Tracking Status: None
"Eudy, Michael" <Michael.Eudy@nrc.gov>
Tracking Status: None
"Lee, Pete" <Pete.Lee@nrc.gov>
Tracking Status: None
"Segala, John" <John.Segala@nrc.gov>
Tracking Status: None
"Huyck, Doug" <Doug.Huyck@nrc.gov>
Tracking Status: None
"McLellan, Judith" <Judith.McLellan@nrc.gov>
Tracking Status: None
"Mark.T.Finley@unistarnuclear.com" <Mark.T.Finley@unistarnuclear.com>
Tracking Status: None

Post Office: HQCLSTR01.nrc.gov

Files	Size	Date & Time
MESSAGE	1382	10/30/2014 12:37:57 PM
DRAFT RAI 428 NSIR RSPLB 7713.docx		31792

Options

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

Request for Additional Information 428 (eRAI 7713)

Issue Date: 10/30/2014

Application Title: Calvert Cliffs Unit 3 - Docket Number 52-016

Operating Company: UniStar

Docket No. 52-016

Review Section: 13.01.02-13.01.03 - Operating Organization

Application Section: Section 13.01

QUESTIONS

13.01.02-12

Revision 10 - Part 2, FSAR, Section 13.1.2.2.1.6, Other Programmatic Reviews and Control, Operational Programs (Page 13.1-31), Figure 13.1-2 — Organizational Structure for Items and Issues Related to Nuclear Safety, Security and Reliability, Pursuant to the Negation Action Plan, and Table 13.4-1 (Pages 13.4-2 to 13.4-7):

A. The staff requests for the applicant to specify in Chapter 13, Conduct of Operations, when the management measures described in Section 13.1.2.2.1.6, "Other Programmatic Reviews and Control, Operational Program," will be implemented to manage the safety/security interface for changes (e.g., to the U.S. EPR standard design, site conditions, and programs, including any amendments or COL holder's authorized changes) after receiving license to construct and operate, but before full implementation of operational programs for operating the CCNPP Unit 3.

Please include in the response the following:

- (1) Clarify and indicate that the review and controls described Section 13.1.2.2.1.6 (i.e., for assessing and managing potential adverse safety and security and trends that emergent and planned operations or activities) include activities that changes the licensing and design bases (e.g., FSAR, Environmental Report, Emergency Plan, Security Plans, etc.), changes the designs and constructions and installations of security/safety structures, systems and components, and changes the physical configurations of the power block and structures or plant layout, that may occur receipt of a COL and the completion of constructions of the reactor and support plant systems and structures for operating the CCNPP Unit 3.
- (2) Clarify and specify that management measures (i.e., programmatic controls and processes) described in Section 13.1.2.2.1.6, within Section 13.1.2, "Operation Organization," is applicable to the requirement for an "Independent Review Body" stated in Section 13.1.1.1.2.9, "Safety Review," under Section 13.1.1, "Management and Technical Support Organization." This section states that "Oversight of CCNPP Unit 3 programs, procedures, and activities is performed by an Independent Review Body. Details of the composition and activities of this committee are described in Section 13.1.2.2.1.5, Chapter 17 and the QAPD."
- (3) Clarify and indicate that Reference "NRC, 2009, Managing the Safety/Security Interface, Regulatory Guide 5.74, U.S. Nuclear Regulatory Commission, June 2009," in Section 13.1.4, "References," is incorporated, in whole, for implementing management measures described in Section 13.1.2.2.1.6.
- (4) Clarify and indicate how the management measures described in Section 13.1.2.2.1.6 will be addressed during the development of specific safety and security programs for milestones indicated in Table 13.4-1. Included descriptions of when the "Independent Review Body" will be established and will be implemented, and clarify whether this is immediately after issuance of a COL and maintained throughout the completion of design

and throughout the construction of the CCNPP Unit 3 reactor and development of detail programs to manage changes.

- (5) Describe how the "Security Subcommittee," described in Figure 13.1.2 is included in the management measures described in Sections 13.1.1 and 13.1.2. Clarify whether the requirements of 10 CFR 73.58 are items and issues for the Security Subcommittee under Items No. 4, No. 6, and No. 7 of Figure 13.1.2.

Regulatory Basis:

Subpart C of Title 10 CFR (10 CFR) 52, § 52.79(a)(35)(i) and (ii) requires that information submitted for combined license (COL) include how the applicant will meet the requirements of 10 CFR 73 and descriptions of implementation of the physical security plan. Title 10 CFR 73.55(b)(4) states that licensee shall analyze and identify site-specific conditions, including target sets, that may affect the specific measures needed to implement the requirements of this section [10 CFR 73.55] and shall account for these conditions in the design of the physical protection program.

The COLA Application Part 2, Final Safety Analysis Report (FSAR) establishes the design and licensing bases for how CCNPP Unit 3 will be constructed and operated. The FSAR, Chapter 13, Conduct of Operations, Section 13.1.2.2.1.6, "Other Programmatic Reviews and Controls," states the following:

"Programmatic controls and processes (such as plant operations review committees, plant review boards, safety review committees, work planning and controls, corrective action and reporting programs, etc.) are established to assess and manage potential adverse safety and security issues and trends to ensure that emergent and planned operations or activities are identified, reviewed, approved, monitored, and documented as appropriate. These programmatic controls include reviews of proposed changes to the facility as described in the FSAR; reviews of violations, deviations, and reportable events; results of investigations; review of corrective actions; and reviews of audits to ensure that safety issues and issues involving physical protection, including the safety/security interface, will be appropriately addressed (NRC, 2009). The results of these programmatic controls and processes may be used as inputs to the IRB function in accordance with Section 13.1.2.2.1.5.2.b."

Section 13.1.1.1.2.9, "Safety Review," under Section 13.1.1, "Management and Technical Support Organization," states that "[o]versight of CCNPP Unit 3 programs, procedures, and activities is performed by an Independent Review Body. Details of the composition and activities of this committee are described in Section 13.1.2.2.1.5, Chapter 17 and the QAPD [Quality Assurance Program Description]."

Section 13.1.2.2.1.5, "Independent Review Body," indicate that "during the operation phase, an independent review body (IRB) will be established . . ."

Because the descriptions of management measures (i.e., "Other Programmatic Reviews and Controls,") is described under Section 3.1.2, "Operation Organization," it is not clear whether this management measures, as described, would be implemented once licensed, and will review, control or analyze and identify changes in the site-specific conditions related to CCNPP Unit 3 COL (including the U.S. EPR standard design incorporated by reference) structures, systems, and components in the completion of final detailed designs and constructions that may impact security (or safety) between issuance of the COL and the full implementation of the security and other operational programs milestones in Table 13.4-1, to ensure that Security Plans continue to meet the 10 CFR 73.55(b)(4).

- B.** The staff requests for the applicant to describe how the physical protection program, to include Security Plans (consisting of a Physical Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan, and Cyber Security Plan), will be revised to address changes that affect (both beneficial and adverse) the protective strategy with the as-built configuration between issuance of license and the full implementation of security operational programs prior to the milestones indicated in Table 13.4-1.

Regulatory Basis:

Subpart C of Title 10 CFR (10 CFR) 52, § 52.79(a)(35)(i) and (ii) requires that information submitted for combined license (COL) include how the applicant will meet the requirements of 10 CFR 73 and descriptions of implementation of the physical security plan. The control of changes under the provisions of 10 CFR 50.54(p)(1) and 10 CFR 50.54(p)(2) requires that Security Plans are updated to reflect changes that are authorized by a licensee without prior NRC approval and with NRC approval. Clarification is required as to how changes between issuance of the COL and the full implementation of the security (and other) operational program milestones in Table 13.4-1, will be addressed under the provisions of 10 CFR 50.54(p)(1) and 10 CFR 50.54(p)(2).