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ATTENTION: Mr. Samuel J. Collins

Your ref: Docket No. 52-006  
Our ref: DCP/NRC1518

August 14, 2002

SUBJECT: AP1000 Design Certification Review Schedule

REFERENCE: Letter dated July 12, 2002 from J. E. Lyons to W. E. Cummins,  
"AP1000 Design Certification Review Schedule"

Dear Mr. Collins:

I am writing to ask your support in achieving efficiencies in the NRC staff review of the AP1000 Design Certification Application. We are in receipt of the reference letter that details the staff's proposed schedule for review. The staff has laid out a review schedule that requires 29 months from the time that the complete application was filed to issuance of the final design approval. We agree that this is substantially shorter than was needed for prior design certification efforts, but we believe that even more improvement can be made to the AP1000 schedule without any compromise in quality of review or safety of the design. Prior to docketing our application, the staff invested over 17 calendar months and considerable resources to determine whether key aspects of the AP600 design certification review were directly applicable to the AP1000, and to perform the acceptance review of our Design Certification application. Because of those important affirmative decisions (with reservations as noted in the reference), we believe that the stage is set for a highly focused and efficient design certification review effort that can be accomplished in less time than the current plan. We are pleased to note that the reference letter also acknowledges that schedule improvements are possible. However, we believe that an aggressive target schedule should be agreed upon early so that improvements in the schedule can be realized.

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By concurrent letter to Mr. Lyons (copy attached), Mr. Corletti has laid out a proposed target schedule that we believe is achievable. We are not requesting a change to the overall "official schedule" promulgated in the reference. We are asking that the staff carefully consider our proposal and that both Westinghouse and NRC staff work together to lay out a detailed, aggressive success-oriented set of milestones that we would agree to work to and mutually strive to achieve. We will continue to work with the New Reactor Licensing Project Office to discuss the details of our proposal.

Thank you for your commitment to make the Nuclear Regulatory Commission a model of efficient and effective government and for your willingness to explore our proposal.

Very truly yours,



W. E. Cummins, Director  
AP600 & AP1000 Projects  
Nuclear Plant Projects

/Attachment

1. DCP/NRC1517, Westinghouse memo, "Westinghouse Response to NRC Letter from J. Lyons to W. E. Cummins, "AP1000 Design Certification Review Schedule," M. M. Corletti to US NRC dated 8/13/2002



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ATTENTION: Mr. James E. Lyons

Your ref: Docket No. 52-006  
Our ref: DCP/NRC1517

August 14, 2002

SUBJECT: Westinghouse Response to NRC Letter from J. Lyons to W. E. Cummins,  
"AP1000 Design Certification Review Schedule," dated July 12, 2002

Dear Mr. Lyons:

I would like to thank you for your letter that outlines the milestones and schedule for the AP1000 Design Certification review. As you point out in your letter, the proposed Design Certification schedule is significantly shorter than the previous Design Certification reviews, due to the efficiencies gained as a result of similarities in the design of the AP1000 and the already certified AP600. Furthermore, we believe significant progress was made during the pre-certification review of AP1000 that was completed prior to the submittal of our application. As you acknowledge in your letter, this schedule can be improved based on several factors, including the ability of both organizations to meet schedule commitments, as well as Westinghouse's ability to provide high-quality submittals that can effectively resolve potential issues. This letter provides you our feedback on the proposed schedule, and provides specific recommendations as to how the schedule may be improved.

In your letter, you emphasize the need for Westinghouse to submit additional information that the staff deems critical to the review schedule. We submitted the supplemental information requested by the staff on schedule (July 31, 2002). We believe this supplemental information should result in significant progress in resolving two important issues raised in your letter.

We believe that the first two milestones of the proposed schedule are aggressively scheduled, and we agree with these milestones. The first milestone is for the NRC staff to provide their Requests for Additional Information (RAI) by September 30, 2002. The next major milestone is for Westinghouse to provide our responses to the NRC's RAIs by December 2, 2002. We believe that both of these milestones are critical to a success-oriented schedule.

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The next milestone in your schedule is for the NRC to issue a Draft Safety Evaluation Report (DSER) by June 16, 2003. Your schedule indicates that you assume that the DSER will contain open items, and that the schedule beyond this date could be improved, depending on the scope and magnitude of the open items. We have a high confidence that the number of potential DSER open items for the AP1000 will be limited because of the similarities of the AP1000 to the AP600, as well as the progress that was made during the pre-certification review. It is Westinghouse's objective to attempt to achieve a DSER that has zero open items, which will result in a significant reduction in the overall schedule.

To meet these objectives, we request that the NRC staff define potential DSER open items as early as practical so that Westinghouse can address them prior to issuance of the DSER. We suggest that an efficient way to identify these potential issues is for the staff to identify which (if any) RAI responses provided by Westinghouse require clarification or supplemental information to fully address the issue identified in the RAI. We suggest that the staff provide Westinghouse this feedback by the end of February 2003.

Such a target milestone allows Westinghouse and the staff to resolve these potential open items prior to issuance of a DSER. We envision a series of technical meetings or teleconferences to discuss the potential open items, followed up by a Westinghouse submittal of revised RAI responses that respond to the staff's questions and thereby technically resolves the potential issues. We suggest a reasonable target date for resolution of these issues would be in April 2003, which would allow for the staff to complete a Draft Safety Evaluation Report with no open items by your target date of June 16, 2003. This would permit ACRS review to be completed by August 2003, with subsequent FSER and Final Design Approval in September and October of next year. It is recognized that these milestones depend on Westinghouse's ability to perform in providing high quality submittals that resolve potential issues. Such an accelerated schedule is a worthwhile goal for both Westinghouse and the NRC.

An area you discuss in your letter that will need to be resolved is the safeguards and security issue. We believe that the current resolution path you outline is acceptable, and we are confident that the AP1000 is a robust design that will meet the necessary safeguards and security requirements for new and existing reactors. We appreciate your continued communication of evolving issues in the security area.

Another important aspect to this schedule is the review of the AP1000 by the Advisory Committee on Reactor Safeguards (ACRS). It is our understanding that the ACRS will expect at least two full committee meetings, and six sub-committee meetings. We believe that the schedule for these dates should receive priority, so that the ACRS has an opportunity to effectively and productively conduct their necessary review. In that regard, we have requested an introductory AP1000 Kick-off Presentation to the ACRS to be held as early as September 2002, for the purpose of explaining the AP1000 standard plant. We look forward to working with your staff to effectively schedule our interactions with the ACRS.

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I would like to thank you and your staff for your commitment to effectively manage the AP1000 Design Certification review. It is clear that your staff is committed to conduct a thorough and efficient review, and we appreciate the professionalism with which the review is being carried out. We have enclosed our proposed schedule as Attachment 1. We would like to discuss our proposal with you further with the objective of agreeing on our target milestones.

Please contact me if you have any questions at 412-374-5355.

Very truly yours,



M. M. Corletti  
Passive Plant Projects & Development  
AP600 & AP1000 Projects

/Attachment

1) "AP1000 Design Certification Review Schedule," dated August 5, 2002

August 14, 2002

**Attachment 1**

<b>AP1000 Design Certification Review Schedule</b>		
<small>(8/5/2002)</small>		
<b>Milestone</b>	<b>NRC Scheduled Milestones</b>	<b>Target Milestone Dates</b>
ACRS Introductory Meeting		September, 2002
NRC issue Requests for Additional Information (RAI)	September 30, 2002	September 30, 2002
Westinghouse respond to RAI	December 2, 2002	December 2, 2002
NRC provide list of RAI that require further discussion (i.e. potential DSER Open Items)	—	February 28, 2003
Westinghouse / NRC hold technical meetings to resolve issues.	—	March 2003
Westinghouse provide revised RAI responses		April 15, 2003
NRC issues Draft SER	June 16, 2003	June 16, 2003
NRC / Westinghouse meet with ACRS re SER		July 2003 (August 2003 if required)
NRC issues Final SER	September 13, 2004	September 15, 2003
NRC Issues Final Design Approval	October 25, 2004	October 24, 2003
Design Certification Rulemaking Complete	December 2005	July 2004*

\* Date assumes no design changes incorporated after FDA, and recognizes efficiencies gained for AP1000 based on AP1000 Application having been submitted as a Design Control Document, and assuming similar Tier 2\* information for AP1000 as AP600.

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August 14, 2002

bcc: C. B. Brinkman - Westinghouse, Rockville, MD  
J. A. Fici - Westinghouse, Windsor, CT  
W. E. Cummins - Westinghouse, Pittsburgh, PA, EC E3  
E. H. Kennedy - Westinghouse, Windsor, CT  
H. A. Sepp - Westinghouse, Pittsburgh, PA, EC E4-07A  
R. P. Vijuk - Westinghouse, Pittsburgh, PA, EC E3-05  
J. W. Winters - Westinghouse, Pittsburgh, PA, EC E3-08