February 12, 2003

MEMORANDUM TO: Marsha Gamberoni, Deputy Director

New Reactor Licensing Project Office Office of Nuclear Reactor Regulation

FROM: Lawrence J. Burkhart, AP1000 Project Manager /RA/

New Reactor Licensing Project Office Office of Nuclear Reactor Regulation

SUBJECT: FEBRUARY 4, 2003, TELEPHONE CONFERENCE CALL SUMMARY

On Tuesday, February 4, 2003, a telephone conference call was held with Westinghouse Electric Company (Westinghouse) representatives and the Nuclear Regulatory Commission (NRC) staff to discuss issues associated with the review of WCAP-15992, "AP1000 Adverse System Interactions Evaluation Report," which was submitted on December 2, 2002 (ADAMS Accession No. ML023370619). A list of telephone conference call participants may found in Attachment 1. In preparation for the telephone conference call, I forwarded comments on WCAP-15992 via electronic mail to Mr. Michael Corletti of Westinghouse on January 15, 2003 (Attachment 2). To provide feedback to the NRC staff prior to the call, Mr. Corletti forwarded comments to me via electronic mail on January 28, 2003 (Attachment 3). The discussions during the call focused on areas of the WCAP that may need to be clarified.

In response to the NRC staff comments, the Westinghouse representative stated that WCAP-15992 would be revised as follows:

- provide additional clarifying information regarding how an operator is directed to use backup and/or alternate means in the case of an instrumentation and control (I&C) system failure, and
- provide additional clarifying information regarding adverse interactions between the protection and monitoring and the diverse actuation systems.

The NRC staff also initiated discussions of I&C-related issues contained in WCAP-15847, "AP1000 Quality Assurance Procedures Supporting NRC Review of AP1000 DCD [Design Control Document] Sections 18.2 and 18.8." These comments were first discussed with Westinghouse representatives on February 4, 2003, and comments were sent to Mr. Michael Corletti via electronic mail on February 5, 2003 (Attachment 4). In response to these comments, Westinghouse representatives stated that they would review the comments and inform the NRC staff of any proposed revisions to WCAP-15847.

Docket No. 52-006

Attachment: As stated

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Distribution: Hard Copy

NRLPO R/F JLyons LBurkhart MGamberoni

E-mail JMoore, OGC

PUBLIC HLi JSegala
RBorchardt EMarinos JColaccino
JWilliams JStarefos RWeisman, OGC

ACCESSION NUMBER: ML030420270

	NRLPO/PM	EEIB/SC	NRLPO/DD
NAME	LBurkhart:cn	EMarinos	MGamberoni
DATE	2/12/03	2/11/03	2/12/03

FEBRUARY 4, 2003 TELEPHONE CONFERENCE CALL SUMMARY LIST OF PARTICIPANTS

Nuclear Regulatory Commission Westinghouse

Larry Burkhart Joelle Starefos Hulbert Li

Mike Corletti Bob Fuld Kathy Dimitri Tom Hayes

NRC STAFF COMMENTS SENT TO MR. MICHAEL CORLETTI OF WESTINGHOUSE VIA ELECTRONIC MAIL ON JANUARY 15, 2003, IN PREPARATION FOR THE FEBRUARY 4, 2003, TELEPHONE CONFERENCE CALL

WCAP-15922, Section 3, "Evaluation of Potential Human Commission Errors," does not address the possibility of a plant malfunction (such as failed indication) inhibiting an operator's ability to respond (The Data Display and Processing system (DDS) is a non-safety related computer-based system that can be failed). What is the backup provision to support the analyses described in the WCAP-15992?

WESTINGHOUSE STAFF INPUT SENT FROM MR. MICHAEL CORLETTI OF WESTINGHOUSE VIA ELECTRONIC MAIL ON JANUARY 28, 2003, IN PREPARATION FOR THE FEBRUARY 4, 2003, TELEPHONE CONFERENCE CALL

WCAP-15992, ["AP1000 Adverse System Interactions Evaluation Report,"] evaluates adverse system interactions. Defense-in-depth [DID] provides redundant and diverse means to monitor and accomplish each safety function, reducing the possibility of unmitigated interactions. Passive systems have reduced the need for operator response. If an I&C [instrumentation and control] system fails, operators are directed to use backup and/or alternate means to respond, as in ATWS [anticipated transient without scram] scenarios or a Common Mode Failure [CMF] analysis. The systems remaining available for use will depend upon the hypothesized failure and its results. However, the reliability of the I&C architecture and the adequacy of its DID are established independent of the issue of adverse system interactions. Bounding single failures of plant equipment are addressed by FMEA [failure modes and effects analysis] and safety analysis. Multiple failures of equipment and operators are addressed by PRA [probabilistic risk assessment] and CMF analysis.

Credible human errors of commission are considered in this report as possible complicating factors for selected adverse system interactions. No credible human errors of commission were found to have significant impact by the present analysis. Therefore, no additional issues were raised about the adequacy of the I&C systems design, including the extent of its backup systems and facilities.

Basically, we do not see the need to update the WCAP for his issue. However, the above discussion could be folde[d] into the WCAP if Hulbert [Li, the NRC staff reviewer] believes it addresses his issue.

NRC STAFF COMMENTS DISCUSSED WITH WESTINGHOUSE STAFF DURING THE FEBRUARY 4, 2003, TELEPHONE CONFERENCE CALL AND SENT TO MR. MICHAEL CORLETTI OF WESTINGHOUSE VIA ELECTRONIC MAIL ON FEBRUARY 5, 2003.

Reference: WCAP-15847, "AP1000 Quality Assurance Procedures Supporting NRC Review of AP1000 DCD [Design Control Document] Sections 18.2 and 18.8" Section AP-3.14, "Plant Instrumentation and Control [I&C] System."

With regard to the Instrumentation and Control (I&C) design process, WCAP-15847 has not addressed the Life Cycle Design Process for a digital I&C protection system. Westinghouse should revise WCAP-15847 to include the Life Cycle Design Process as discussed in WCAP-15927, "Design Process for AP1000 Common Q Safety Systems," and WCAP-13383, "AP600 Instrumentation and Control Hardware and Software Design, Verification, and Validation Process Report."

CC:

Mr. W. Edward Cummins AP600 and AP1000 Projects Westinghouse Electric Company P.O. Box 355 Pittsburgh, PA 15230-0355

Mr. H. A. Sepp Westinghouse Electric Company P.O. Box 355 Pittsburgh, PA 15230

Lynn Connor Doc-Search Associates 2211 SW 1ST Ave - #1502 Portland, OR 97201

Barton Z. Cowan, Esq. Eckert Seamans Cherin & Mellott, LLC 600 Grant Street 44th Floor Pittsburgh, PA 15219

Mr. Ed Rodwell, Manager Advanced Nuclear Plants' Systems Electric Power Research Institute 3412 Hillview Avenue Palo Alto, CA 94304-1395

Charles Brinkman, Director Washington Operations Westinghouse Electric Company 12300 Twinbrook Parkway, Suite 330 Rockville, MD 20852

Mr. R. Simard Nuclear Energy Institute 1776 I Street NW Suite 400 Washington, DC 20006

Mr. Thomas P. Miller U.S. Department of Energy Headquarters - Germantown 19901 Germantown Road Germantown, MD 20874-1290

Mr. David Lochbaum Nuclear Safety Engineer Union of Concerned Scientists 1707 H Street NW, Suite 600 Washington, DC 20006-3919

Mr. Paul Gunter Nuclear Information & Resource Service 1424 16th Street, NW., Suite 404 Washington, DC 20036 Mr. Tom Clements 6703 Guide Avenue Takoma Park, MD 20912

Mr. James Riccio Greenpeace 702 H Street, NW, Suite 300 Washington, DC 20001

Mr. James F. Mallay, Director Regulatory Affairs FRAMATOME, ANP 3315 Old Forest Road Lynchburg, VA 24501

Mr. Ed Wallace, General Manager Project Management Lake Buena Vista Bldg., 3rd Floor 1267 Gordon Hood Avenue Centurion 0046 Republic of South Africa PO Box 9396 Centurion 0046

Mr. Vince Langman Licensing Manager Atomic Energy of Canada Limited 2251 Speakman Drive Mississauga, Ontario Canada L5K 1B2

Mr. Gary Wright, Manager Office of Nuclear Facility Safety Illinois Department of Nuclear Safety 1035 Outer Park Drive Springfield, IL 62704

Dr. Gail H. Marcus U.S. Department of Energy Room 5A-143 1000 Independence Ave., SW Washington, DC 20585

Mr. Edwin Lyman Nuclear Control Institute 1000 Connecticut Avenue, NW Suite 410 Washington, DC 20036

Mr. Jack W. Roe SCIENTECH, INC. 910 Clopper Road Gaithersburg, MD 20878

Patricia Campbell Winston & Strawn 1400 L Street, NW Washington, DC 20005 Mr. David Ritter Research Associate on Nuclear Energy Public Citizens Critical Mass Energy and Environmental Program 215 Pennsylvania Avenue, SE Washington, DC 20003

Mr. Michael M. Corletti Passive Plant Projects & Development AP600 & AP1000 Projects Westinghouse Electric Company P. O. Box 355 Pittsburgh, PA 15230-0355