

Bill,

We have reviewed GE's responses in MFN 06-376. We find that we disagree with your responses to the following two RAIs:

14.2-5: 14.2-5 states that the testing of the fault tolerant digital controllers is detailed in section 7.7.3.4 and 7.7.3.5 of the DCD. As such, the applicant stated that the phrase "proper operation of instrumentation and controls in the required combinations of logic and instrument channel trips, including verification of setpoints" in Section 14.2.8.1.2 of the DCD covers the above testing. The staff disagrees with the applicant's response. At a minimum, the DCD should be revised to include specific pointers in 14.2.8.1.2 to the location in the DCD where the testing is described, i.e., 7.7.3.4 and 7.7.3.5.

14.2-7: 14.2-7 states that the correct failure mode is verified as part of Tier 1, Table 2.2.2-1, Tests 4 and 7. Tier 2 tests that implement the Tier 1, Table 2.2.2-1 tests requirements are described in section 4.6.3 of the DCD. As such, the applicant stated that the phrase "proper operation of hydraulic control units and associated valves" in Section 14.2.8.1.4 enforces the described tests. The staff disagrees with the applicant's response. At a minimum, the DCD should be revised to include specific pointers in 14.2.8.1.4 to the location in the DCD where the testing is described, i.e., 4.6.3.

We would appreciate your reply in a timely manner.

Don

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Subject: Supplement to RAIs 14.2-5 and 14.2-7 (MFN 06-376)
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