



GE Energy

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MFN 06-445

Docket No. 52-010

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U.S. Nuclear Regulatory Commission  
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Subject: **Response to Portion of NRC Request for Additional Information  
Letter No. 74 – ESBWR Human Factors Engineering NEDO-33275,  
Rev. 0, ESBWR HFE Training Development Implementation Plan –  
RAI Numbers 18.10-1 and 18.10-2**

Enclosure 1 contains GE's response to the subject NRC RAIs transmitted via the  
Reference 1 letter.

If you have any questions about the information provided here, please let me know.

Sincerely,

A handwritten signature in cursive script that reads "Kathy Sedney for".

David H. Hinds  
Manager, ESBWR

D068

Reference:

1. MFN 06-383, Letter from U.S. Nuclear Regulatory Commission to David Hinds, *Request for Additional Information Letter No. 74 Related to ESBWR Design Certification Application*, October 11, 2006

Enclosures:

1. MFN 06-445 – Response to Portion of NRC Request for Additional Information Letter No. 74 Related to ESBWR Design Certification Application –ESBWR Human Factors Engineering – RAI Numbers 18.10-1 and 18.10-2

cc: AE Cubbage USNRC (with enclosures)  
GB Stramback GE/San Jose (with enclosures)  
eDRF 0000-0061-0156

**Enclosure 1**

**MFN 06-445**

**Response to Portion of NRC Request for**

**Additional Information Letter No. 74**

**Related to ESBWR Design Certification Application**

**Human Factors Engineering**

**NEDO-33275, Rev. 0, ESBWR HFE Training Development  
Implementation Plan**

**RAI Numbers 18.10-1, 18.10-2**

**NRC RAI 18.10-1**

*Training requires significant input from the plant designer, yet is classified as an operational program under the ultimate responsibility of an ESBWR COL licensee. The areas in NEDO-33275, Section 3.4, that address the content of the training program appear to be primarily a COL holder's responsibility. Is GE proposing to certify these aspects of training as well? Please clarify which aspects of Training Program Development that GE is requesting be design certified.*

**GE Response**

The need to have a centralized and generic training program for ESBWR is recognized. The scope of work relative to training including and beyond operations will be determined after the Combined Operating Licensee Owners Group (COLOG) charter has been drafted.

GE is requesting that the requirements for the following be design certified:

- lesson plans,
- training procedures,
- reference training simulator (RTS),
- simulator scenarios, and
- job performance measures.

Refer to response to RAI 18.13-5.

**DCD/LTR Impact**

No DCD changes will be made in response to this RAI.

No changes to the subject LTR will be made in response to this RAI.

**NRC RAI 18.10-2**

- A. *NEDO-33275, Section 1.1, appears to limit the plan and training program to operators, while other parts, Section 3.1 and Table 1, are more appropriately complete. Please clarify.*
- B. *NEDO-33275, Section 2.2, Codes and Standards, list the 1976 version of ANS 3.2 but should refer to the current 1994 version (reaffirmed 1999).*
- C. *Reg Guide 1.149 on simulators is addressed in NEDO-33275, Section 3.2, but is not in the reference section 2.3. Please clarify these discrepancies.*

**GE Response**

- A. The scope of the training program elements to be provided by GE will be determined after the COLOG has been established and its charter has been drafted. NEDO-33275 Section 1.1 and Section 3.1 will be aligned to be compatible with Table 1 in the next revision.
- B. NEDO-33275 Section 2.2 will be updated in the next revision to reflect current standards.
- C. NEDO-33275 Sections 3.2 and 2.3 will be aligned line and compatible in the next revision.

**DCD/LTR Impact**

No DCD changes will be made in response to this RAI.

LTR NEDO-33275, Rev 0 will be revised as described above.