



GE Energy

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MFN 06-495

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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 – Tier 1, Table 3.3-1 - RAI Numbers 14.3-85 through
14.3-89**

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 "David H. Hinds for".

David H. Hinds
Manager, ESBWR

Reference:

1. MFN 06-386, 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

Enclosure:

1. MFN 06-495 – Response to Portion of NRC Request for Additional Information Letter No. 74 – Tier 1, Table 3.3-1 - RAI Numbers 14.3-85 through 14.3-89

cc: AE Cubbage USNRC (with enclosures)
GB Stramback GE/San Jose (with enclosures)
eDRF 0000-0062-0255

Enclosure 1

MFN 06-495

Response to Portion of NRC Request for

Additional Information Letter No. 74

Tier 1, Table 3.3-1

RAI Numbers 14.3-85 through 14.3-89

NRC RAI 14.3-85

DCD, Tier 1, Table 3.3-1, Item 10.a. states "A Procedure.. Implementation Plan is developed which establishes that ... procedures are developed..." This plan has already been completed and is being reviewed as part of design certification of the ESBWR. Therefore 10.a does not belong in the ITAAC. Item 10.b relates to the implementation of the Procedure Development Plan and is appropriate, but should be modified to be similar, perhaps, to the HFE ITAAC used for AP 1000.

GE Response

In revision 2 to DCD Tier 1, Item 10.a was deleted and Item 10.b (now Item 7) was modified considering the suggested guidance.

DCD Impact

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

NRC RAI 14.3-86

DCD Tier 1, ITAAC for Training Development, Table 3.3-1, Item 11.a. states "A Training Program Development Implementation Plan is developed which establishes..." This plan has already been completed and is being reviewed as part of design certification of the ESBWR. Therefore 11.a does not belong in the ITAAC. Item 11.b relates to the implementation of the training program itself. Since the training is an operational program, this ITAAC is not needed.

GE Response

In revision 2 to DCD Tier 1, Item 11.a was deleted and Item 11.b (now Item 8) was modified to contain a results summary report describing the training program.

DCD Impact

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

NRC RAI 14.3-87

The Tier 1 inspections, tests, analysis, and acceptance criteria (ITAAC) for V&V is in DCD Tier 1, Revision 1, Table 3.3-1, Item 12.a relates to developing a V&V plan, which has already been completed and is being reviewed as part of design certification of the ESBWR. Therefore, 12.a does not belong in the ITAAC. Item 12.b relates to the implementation of the V&V itself. This should be modified to be the implementation of the V&V Plan and should be constructed following the guidance on the Standard Review Plan (SRP) Section 14.3.

GE Response

In revision 2 to DCD Tier 1, Item 12.a was deleted and Item 12.b (now Item 9) was modified considering the suggested guidance.

DCD Impact

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

NRC RAI 14.3-88

The Tier 1 inspections, tests, analysis, and acceptance criteria (ITAAC) for Design Implementation as is in DCD Tier 1, Revision 1, Table 3.3-1, Item 13.a, relates to developing an implementation plan, which has already been completed and is being reviewed as part of design certification of the ESBWR. Therefore, 13.a does not belong in the ITAAC. Item 13.b relates to the implementation of the V&V itself. This should be modified to be the implementation of the V&V Plan and should be constructed following the guidance on the Standard Review Plan (SRP) Section 14.3.

GE Response

In revision 2 to DCD Tier 1, Item 13.a was deleted and Item 13.b (now Item 10) was modified considering the suggested guidance.

DCD Impact

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

NRC RAI 14.3-89

The Tier 1 inspections, tests, analysis, and acceptance criteria (ITAAC) for human performance engineering in DCD Tier 1, Revision 1, Table 3.3-1, Item 14.a relates to developing an implementation plan, which has already been completed and is being reviewed as part of design certification of the ESBWR. Therefore, 14.a does not belong in the ITAAC. Item 14.b relates to the implementation of the monitoring program itself, which is a COL responsibility subsequent to plant startup. This ITAAC should be modified to be the establishment of the human performance monitoring program by the COL licensee and should follow the guidance of the Standard Review Plan (SRP) Section 14.3.

GE Response

In revision 2 to DCD Tier 1, Item 14.a was deleted and Item 14.b (now Item 11) was modified to contain a results summary report describing the HPM program.

DCD Impact

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