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Your ref: Project Number 740  
Our ref: DCP/NRC1836

February 21, 2007

Subject: AP1000 COL Response to Request for Additional Information (TR #6)

In support of Combined License application pre-application activities, Westinghouse is submitting a response to a NRC request for additional information (RAI) on AP1000 Standard Combined License Technical Report 6, APP-GW-GLR-021, Rev. 0, AP1000 As-Built COL Information Items. This RAI response is submitted as part of the NuStart Bellefonte COL Project (NRC Project Number 740). The information included in the response is generic and is expected to apply to all COL applications referencing the AP1000 Design Certification.

A response is provided for request TR6-5, transmitted in NRC letter dated January 9, 2007 from Steven D. Bloom to Andrea Sterdis, Subject: Westinghouse AP1000 Combined License (COL) Pre-application Technical Report 6 – Request for Additional Information (TAC No. MD2174).

Pursuant to 10 CFR 50.30(b), the response to request for additional information on Technical Report 6 is submitted as Enclosure 1 under the attached Oath of Affirmation.

It is expected that when the RAIs on Technical Report 6 are complete, the technical report will be revised as indicated in the response and submitted to the NRC. The RAI response will be included in the document.

Questions or requests for additional information related to the content and preparation of this response should be directed to Westinghouse. Please send copies of such questions or requests to the prospective applicants for combined licenses referencing the AP1000 Design Certification. A representative for each applicant is included on the cc: list of this letter.

Very truly yours,

A handwritten signature in black ink that reads 'D. J. Hutchings' followed by a stylized 'for'.

A. Sterdis, Manager  
Licensing and Customer Interface  
Regulatory Affairs and Standardization

/Attachment

1. "Oath of Affirmation," dated February 21, 2007

/Enclosure

1. Response to Request for Additional Information on Technical Report No. 6, RAI-TR06-005

cc:	S. Bloom	- U.S. NRC	1E	1A
	S. Coffin	- U.S. NRC	1E	1A
	G. Curtis	- TVA	1E	1A
	P. Grendys	- Westinghouse	1E	1A
	P. Hastings	- Duke Power	1E	1A
	C. Ionescu	- Progress Energy	1E	1A
	D. Lindgren	- Westinghouse	1E	1A
	A. Monroe	- SCANA	1E	1A
	M. Moran	- Florida Power & Light	1E	1A
	C. Pierce	- Southern Company	1E	1A
	E. Schmiech	- Westinghouse	1E	1A
	G. Zinke	- NuStart/Entergy	1E	1A

ATTACHMENT 1

“Oath of Affirmation”

ATTACHMENT 1

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of: )  
NuStart Bellefonte COL Project )  
NRC Project Number 740 )

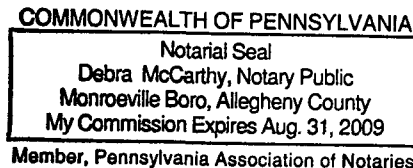
APPLICATION FOR REVIEW OF  
"AP1000 GENERAL COMBINED LICENSE INFORMATION"  
FOR COL APPLICATION PRE-APPLICATION REVIEW

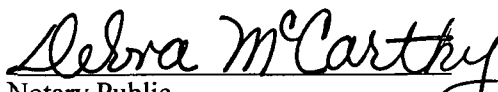
D. Lipman, being duly sworn, states that he is Senior Vice President, Nuclear Power Plants, for Westinghouse Electric Company; that he is authorized on the part of said company to sign and file with the Nuclear Regulatory Commission this document; that all statements made and matters set forth therein are true and correct to the best of his knowledge, information and belief.



D. Lipman  
Senior Vice President  
Nuclear Power Plants

Subscribed and sworn to  
before me this *21st* day  
of February 2007.



  
Notary Public

ENCLOSURE 1

Response to Request for Additional Information on Technical Report No. 6

RAI-TR06-005

# AP1000 TECHNICAL REPORT REVIEW

## Response to Request For Additional Information (RAI)

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RAI Response Number: RAI-TR06-005

Revision: 0

### **Question:**

The staff requests that COL Information Item 13.6-2 be revised to state the following:

The Combined License holder will verify that the as-built location of vital equipment is inside vital areas identified in reference 6 after the installation of the vital equipment prior to fuel load for low-enriched uranium (LEU) fuel or prior to the receipt of fuel on site for mixed-oxide weapons-grade plutonium (MOX) fuel.

### **Westinghouse Response:**

COL Information item 13.6.2 is to be deleted in a change to Section 13.6 that the NRC Staff will be receiving shortly. The information in 13.6 is to be replaced with reference to the Physical Security Plan provided by applicants. The Physical Security Plan is provided as a licensing document in order to fulfill the requirements of 10CFR50.34. The design related information in 13.6 is to be included as part of an AP1000 enhancement report that is provided by Westinghouse as information classified as Safeguards Information. This approach has been developed by an NEI task team.

Please note that the AP1000 Design Certification does not permit use of mixed-oxide fuel and it is not expected to be amended to permit the use of mixed-oxide fuel. The enhancement report and physical security plan do not address mixed oxide fuel.

### **Design Control Document (DCD) Revision:**

The DCD change markup for DCD Section 13.6 will be provided in separate documents.

### **PRA Revision:**

None

### **Technical Report (TR) Revision:**

The Technical Report will be revised to note the deletion of the COL information items and reference the Enhancement Report (APP-GW-GLR-062) and Physical Security Plan (APP-GW-GLR-068) as follows :

### **COL Information Item 13.6-2**

### **Background**

# AP1000 TECHNICAL REPORT REVIEW

## Response to Request For Additional Information (RAI)

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COL Information Item 13.6-2 (NRC FSER Combined License Action Item 13.6.13.1-1) ~~is associated with vital equipment; is deleted. See the AP1000 Enhancement Report (APP-GW-GLR-062, Reference 4) and Physical Security Plan (APP-GW-GLR-068, Reference 5).~~ ~~associated with vital equipment.~~

~~Combined License applicants referencing the AP1000 certified design will verify that the as-built location of vital equipment is inside the vital areas identified in Reference 6.~~

~~This information item requires that vital equipment be fabricated and installed in the vital area. As built location of vital equipment can not be verified at the submittal of a COL application.~~

### **Technical Justification**

~~The AP1000 is protected from radiological sabotage in part by locating vital equipment in the vital area and protecting the vital area. The vital areas and a listing of the vital equipment are provided in the AP1000 Security Assessment.~~

### **Regulatory Impact**

~~The FSER in Subsection 13.6.5 discusses the vital equipment and vital area. This discussion includes information about physical barriers and control of access into the vital area. This information is not altered by clarifying the timing of the verification of the location of the vital equipment. The conclusions in FSER Subsection 13.6.15 about the effect of the design features on onsite physical protection system and security organization are not altered by clarifying the timing of the verification of the location of the vital equipment.~~

~~This change does not alter the design of the physical protection or the equipment in the vital area. There is no change to the design function of the vital equipment of the walls doors and other features that provide protection of vital equipment. The change does not involve a change to a procedure that adversely affects how the design functions of the vital equipment are performed or controlled. The methodologies associated with protection of vital equipment and security are not altered. This change does not involve a test or experiment. The DCD change does not require a license amendment per the criteria of VIII. B. 5. b. of Appendix D to 10 CFR Part 52.~~

~~The DCD change does not impact design features associated with mitigation of severe accidents and does not require a license amendment based on the criteria of VIII. B. 5. c of Appendix D to 10 CFR Part 52.~~

~~The deferral of the activities in the COL information item does not alter barriers or alarms that control access to protected areas of the plant. The deferral of the activities in the COL information item does not alter requirements for security personnel. Therefore, the deferral of the COL information item activities does not have an adverse impact on the security assessment of the AP1000.~~

# AP1000 TECHNICAL REPORT REVIEW

## Response to Request For Additional Information (RAI)

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### **DCD Mark-up**

The following DCD markup identifies how COL application FSARs should be prepared to incorporate the subject change.

#### **13.6.13.2 Vital Equipment**

~~The Combined License applicants holder referencing the AP1000 certified design will verify that the as-built location of vital equipment is inside the vital areas identified in Reference 6 after the installation of the vital equipment prior to fuel load.~~

Add references 4 and 5 to the APP-GW-GLR-021 Reference section as follows

#### **REFERENCES**

4. APP-GW-GLR-062, Revision 1 AP1000 Enhancement Report
5. APP-GW-GLR-068, Revision 0, Physical Security Plan