

GE-Hitachi Nuclear Energy Americas LLC

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MFN 07-545

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. 101 Related to ESBWR Design Certification Application, RAI  
Number 19.1-152.**

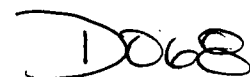
The purpose of this letter is to submit the GE-Hitachi Nuclear Energy Americas LLC (GEH) response to the U.S. Nuclear Regulatory Commission (NRC) Request for Additional Information (RAI) sent by NRC letter dated June 21, 2007 (Reference 1). The response to that question is addressed in Enclosure 1 as RAI Number 19.1-152.

If you have any questions or require additional information, please contact me.

Sincerely,



James C. Kinsey  
Vice President, ESBWR Licensing



NRO

Reference:

1. MFN 07-357, Letter from U.S. Nuclear Regulatory Commission to Robert E. Brown, *Request for Additional Information Letter No. 101 Related to ESBWR Design Certification Application*, June 21, 2007.

Enclosure:

1. Partial Response to NRC RAI Letter No. 101 Related to ESBWR Design Certification Application Probabilistic Risk Assessment RAI Number 19.1-152.

cc:	AE Cabbage	USNRC (with enclosure)
	GB Stramback	GEHNEA/San Jose (with enclosure)
	RE Brown	GEHNEA/Wilmington (with enclosure)
	eDRF Section	0000-0075-3908

**ENCLOSURE 1**

**MFN 07-545**

**Partial Response to NRC Letter No. 101  
Related to ESBWR Design Certification Application  
Probabilistic Risk Assessment  
RAI Number 19.1-152**

**NRC RAI 19.1-152**

*Section 19A.4.2.4 states that the portion of the fire protection system that provides makeup to the FAPCS will "remain operable following a seismic event (Seismic Category II)." However, DCD Section 3.7 states that Seismic Category II (C-II) includes all plant SSC which perform no safety-related function, and whose continued function is not required. Since the continued function of fire protection system makeup to the FAPCS is required, the C-II classification would not necessarily support the performance requirement of the system. Please provide clarification.*

**GEH Response**

Piping and components completely separate from FAPCS pool cooling piping that provide flow paths for post-accident make-up water transfer to the IC/PCC pools and spent fuel pool are designed as Seismic Category I.

DCD Tier 2 Subsection 19A.4.2.4 was revised in Rev. 4 to incorporate this change.

**DCD Impact**

DCD Section 19A.4.2.4 was revised in response to this RAI.

No changes to NEDO-33201 were made in response to this RAI.