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MFN 07-065
Supplement 1

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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. 70 Related to ESBWR Design Certification Application,
Update to ITAAC Tables, RAIs 14.3-70 S01 and 14.3-71 S01**

Enclosure 1 contains GEH's response to Supplement 1 to the original NRC RAI transmitted via the Reference 1 letter.

If you have any questions or require additional information regarding the information provided here, please contact me.

Sincerely,



James C. Kinsey
Vice President, ESBWR Licensing

DOCS
NRO

Reference:

1. MFN 06-382, Letter from U.S. Nuclear Regulatory Commission to David Hinds, *Request for Additional Information Letter No. 70 Related to ESBWR Design Certification Application*, October 10, 2006.

Enclosure:

1. MFN 07-065 S01, Response to a Portion of NRC Request for Additional Information Letter No. 70, Related to ESBWR Design Certification Application, Update to ITAAC Tables, RAI Numbers 14.3-70 S01 and 14.3-71 S01

cc: AE Cabbage USNRC (with enclosures)
DH Hinds GEH (with enclosures)
RE Brown GEH (w/o enclosures)
eDRFs 0000-0075-0682 and 0000-0063-5124 R1

ENCLOSURE 1

**MFN 07-065
Supplement 1**

**Response to a Portion of NRC Request for,
Additional Information Letter No. 70,
Related to ESBWR Design Certification Application,
Update to ITAAC Tables
RAI Numbers 14.3-70 S01 and 14.3-71 S01**

For historical purposes, the original text of RAIs 14.3-70 and 14.3-71 and the GEH responses are included.

RAI 14.3-70

The "Design Description" section in DCD Tier 1 is the abstract of the system described in DCD Tier 2. The ITAAC Table listed design commitments are required to be verified by the NRC before the COL licensee can load the fuel. The staff needs to verify every item in the ITAAC table to assure that the essential portions of the system have been verified. It is suggested that the "Design Description" section has the same numbering system as the ITAAC table numbers.

GEH Response

Tier 1, Section 2 already meets the intent of this RAI request. The ITAAC tables are already numbered consistent with the Tier 1 subsections that include the Design Descriptions. This request would only add un-needed lower subsection numbers. For example, Subsection 2.2.7 (which contains the Design Description) is titled "Reactor Protection System," and the ITAAC table is Table 2.2.7-1, "ITAAC For The Reactor Protection System." There is nothing gained by having a Subsection 2.2.7.1, titled "Design Description," and this change could make Tier 1 more confusing.

DCD Impact

No DCD change will be made as a result of this RAI.

RAI 14.3-70 S01

E-mail from Chandu Patel on 5/4/07.

In response to RAI 14.3-70, the example provided Subsection 2.2.7 has a figure 2.2.7-1, "Reactor Protection System Basic Configuration Block Diagram." In letter MFN 07-160, GE proposed some changes affecting DCD documentation. Update DCD Tier 1 Figure 2.2.7-1 to be consistent with the changes proposed in letter MFN 07-160 dated March 21, 2007. The proposed changes could affect some other Subsections in Tier 1 document. GE should verify that all the changes discussed in the NUMAC topical report are documented in DCD.

GEH Response

Figure 2.2.7-1 is deleted in Rev. 4 of the DCD Tier 1, based on capturing the pertinent design, function, and system interface features. In part, changes committed in the

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MFN 07-160 are incorporated adequately in Rev. 4 of the DCD without reliance on the figure.

DCD Impact

No additional DCD change will be made in response to this supplemental RAI.

RAI 14.3-71

In the ITAAC Table the "Design Commitment" column may contain many sub-numbered items. The "Acceptance Criteria" column should list all those sub-numbers corresponding to each Design Commitment item and discuss what type of document will be available for the staff to verify. It is not acceptable to state that "the certified design commitment is met." This type of blanket statement is difficult to verify under provision of 10 CFR 52.103(g). The acceptance criteria should be objective and unambiguous, in order to prevent misinterpretation.

GEH Response

GEH agrees with this RAI, and will initiate the associated ITAAC table changes for Rev. 3 of Tier 1, and have all changes completed for Rev. 4.

RAI 14.3-71 S01

E-mail from Chandu Patel on 5/4/07.

In response to original NRC RAI 14.3-71, GE has initiated the associated ITAAC table changes, and will have all changes completed in a future DCD revision. This RAI will remain open until DCD markup pages or a DCD revision is submitted showing these changes.

GEH Response

The Tier 1 updated program has been completed. All of the ITAAC tables in Tier 1 were reviewed and updated (as needed) in DCD Rev. 4.

DCD Impact

No additional DCD change will be made in response to this supplemental RAI.