



Westinghouse Electric Company  
Nuclear Power Plants  
P.O. Box 355  
Pittsburgh, Pennsylvania 15230-0355  
USA

U.S. Nuclear Regulatory Commission  
ATTENTION: Document Control Desk  
Washington, D.C. 20555

Direct tel: 412-374-6306  
Direct fax: 412-374-5005  
e-mail: [sterdia@westinghouse.com](mailto:sterdia@westinghouse.com)

Your ref: Project Number 740  
Our ref: DCP/NRC2067

January 11, 2008

Subject: AP1000 Piping DAC/Component COL Information Item 3.9-2 Acceptance Issue

In support of the NRC Acceptance Review of the AP1000 request for Design Certification Amendment (AP1000 Design Control Document, Revision 16), Westinghouse is revising the DCD Revision 16 information related to the Piping Design Acceptance Criteria (DAC) and the information provided to address COL Information Items 3.6-1 and 3.9-2. NRC has identified the following issues related to the Piping DAC and COL Information Items 3.6-1 and 3.9-2:

- The current status of the detailed safety-related piping design is not sufficient to eliminate the piping DAC as proposed in DCD Revision 16
- The as-designed pipe break hazards evaluation is not sufficient to complete COL Information Item 3.6-1
- The design specifications and as-designed design reports for major ASME Section III components are not sufficient to complete COL Information Item 3.9-2
- The design specifications for auxiliary ASME Section III components and valves are not sufficient to complete COL Information Item 3.9-2

Westinghouse is revising the AP1000 DCD Revision 16 to reinstate the AP1000 Piping DAC certified in the existing AP1000 Design Certification Rule (10 CFR 52, Appendix D). Section 1, Tables 1-1 and 1-2 are accordingly revised as documented in APP-GW-GLR-134, Revision 2, "AP1000 DCD Impacts to Support COLA Standardization," transmitted in DCP/NRC2069, Andrea Sterdis to Nuclear Regulatory Commission, dated January 11, 2008. APP-GW-GLR-134, Revision 2, provides the revised DCD sections and the corresponding justification in item NRC 193. The reinstatement of the certified DAC is expected to resolve the NRC acceptance issue associated with piping DAC. There is no COL application impact since DAC are not required to be resolved prior to COL issuance.

Westinghouse is revising the AP1000 DCD Revision 16, Section 3.6.4.1 to include an additional COL License holder item to provide an as-designed pipe break hazards analysis and design. The following COL License holder item is added:

A Combined License holder referencing the AP1000 design will complete the pipe whip restraint design and complete an as-designed pipe break hazards analysis in accordance with the criteria outlined in subsections 3.6.1.3.2 and 3.6.2.5. The as-designed pipe rupture hazard analysis including break locations based on as-designed pipe analysis will be documented in an as-built Pipe Rupture Hazards Analysis Report.

Although the work performed to support the issuance of APP-GW-GLR-074 (TR 7) is deemed adequate to establish the licensing basis in the area of pipe break hazard analysis, the completion of the piping design to resolve the Piping Design Acceptance Criteria (DAC), will be used to identify the as-designed pipe break locations and the whip restraint and jet impingement protection design detail. This as-designed information requires the completed piping design as described in the Piping DAC. Per the guidance provided in Regulatory Guide 1.206, Section CIII.4.3, Item (3), COL applicants referencing the AP1000 design certification amendment application will include License Conditions to provide the additional design specifications and as-designed design reports to address COL Information Item 3.6-1. This additional as-designed information supplements the information provided in DCD Revision 16 and APP-GW-GLR-074.

Westinghouse has verified that the COL Information Item Table, DCD Table 1.8-2 provided in DCD Revision 16 does not require revision to address these changes since COL Information Item 3.6.1 already identifies that there are actions to be completed by the COL License holder.

The addition of these COL License holder items and the corresponding addition of License Conditions to the Bellefonte COL application are expected to resolve the NRC acceptance and docketing issue regarding COL Information Item 3.6-1.

The DCD revised pages for DCD Section 3.6.4.1 are provided in APP-GW-GLR-134, Revision 2, "AP1000 DCD Impacts to Support COLA Standardization," transmitted in DCP/NRC2069, Andrea Sterdis to Nuclear Regulatory Commission, dated January 11, 2008.

Westinghouse is revising the AP1000 DCD Revision 16, Section 3.9.8.2 to include two COL License holder items to provide additional design specifications and reports. The following COL License holder items are added:

- A Combined License holder referencing the AP1000 design will have available for NRC audit the design specifications and as-designed design reports prepared for major ASME Section III components.
- A Combined License holder referencing the AP1000 design will have available for NRC audit the design specifications prepared for ASME Section III auxiliary components and valves.

These items require detailed equipment design and the selection of specific equipment for completion. Per the guidance provided in Regulatory Guide 1.206, Section CIII.4.3, Item (3), COL applicants referencing the AP1000 design certification amendment application will include License Conditions to provide the additional design specifications and as-designed design reports to address COL Information Item 3.9-2. These additional design specifications and reports supplement the specifications referenced in Revision 16 (references 21 through 31 in Section 3.9.9). The Revision 16 referenced specifications were performed using the hard rock seismic spectra previously approved in the existing AP1000 Design Certification Rule (10 CFR 52, Appendix D). The Bellefonte site meets the hard rock site parameters. The specifications are being revised to address soil sites.

Westinghouse has verified that the COL Information Item Table, DCD Table 1.8-2 provided in DCD Revision 16 does not require revision to address these changes since COL Information Item 3.9-2 already identifies that there are actions to be completed by the COL License holder.

The addition of these COL License holder items and the corresponding addition of License Conditions to the Bellefonte COL application are expected to resolve the NRC acceptance and docketing issue regarding COL Information Item 3.9-2.

The DCD revised pages for DCD Section 3.9.8.2 are provided in APP-GW-GLR-134, Revision 2, "AP1000 DCD Impacts to Support COLA Standardization," transmitted in DCP/NRC2069, Andrea Sterdis to Nuclear Regulatory Commission, dated January 11, 2008.

Pursuant to 10 CFR 50.30(b), this letter is submitted under the attached Oath of Affirmation.

Questions or requests for additional information related to the content of this letter 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.

If you have any questions regarding the information provided in this letter, please do not hesitate to contact me on 412-374-6306.

Very truly yours,



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

/Attachment

1. "Oath of Affirmation," dated January 11, 2008

cc:	D. Jaffe	- U.S. NRC	1E	1A
	E. McKenna	- U.S. NRC	1E	1A
	G. Curtis	- TVA	1E	1A
	P. Hastings	- Duke Power	1E	1A
	C. Ionescu	- Progress Energy	1E	1A
	A. Monroe	- SCANA	1E	1A
	J. Wilkinson	- Florida Power & Light	1E	1A
	C. Pierce	- Southern Company	1E	1A
	E. Schmiech	- Westinghouse	1E	1A
	G. Zinke	- NuStart/Entergy	1E	1A
	R. Grumbir	- NuStart	1E	1A
	D. Lindgren	- Westinghouse	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

W. E. Cummins, being duly sworn, states that he is Vice President, Regulatory Affairs and Standardization, 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.



W. E. Cummins  
Vice President  
Regulatory Affairs and Standardization

Subscribed and sworn to  
before me this 11<sup>th</sup> day  
of January 2008.



Notary Public

COMMONWEALTH OF PENNSYLVANIA  
Notarial Seal  
Patricia S. Aston, Notary Public  
Murrysville Boro, Westmoreland County  
My Commission Expires July 11, 2011  
Member, Pennsylvania Association of Notaries