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Your ref: Docket No. 52-006
Our ref: DCP/NRC2151

June 6, 2008

Subject: AP1000 Response to Requests for Additional Information (SRP17.4)

Westinghouse is submitting a response to the NRC requests for additional information (RAIs) on SRP Section 17.4. This RAI response is submitted in support of the AP1000 Design Certification Amendment Application (Docket No. 52-006). The information included in the response is generic and is expected to apply to all COL applications referencing the AP1000 Design Certification and the AP1000 Design Certification Amendment Application.

A response is provided for RAI-SRP17.4-SPLA-01 and -02, as sent in an email from Mike Miernicki to Sam Adams dated April 29, 2008. This response completes two of three requests received to date for SRP Section 17.4. A response to RAI-SRP17.4-SPLA-03 is scheduled to be submitted on June 20, 2008.

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, appearing to read 'Robert Sisk'.

Robert Sisk, Manager
Licensing and Customer Interface
Regulatory Affairs and Standardization

/Enclosure

1. Response to Requests for Additional Information on SRP Section 17.4

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

Responses to Requests for Additional Information on SRP Section 17.4

AP1000 TECHNICAL REPORT REVIEW

Response to Request For Additional Information (RAI)

RAI Response Number: RAI-SRP17.4-SPLA-01
Revision: 0

Question:

TR117 Section 16.3.1, "Investment Protection Short Term Availability Controls," states:

"These investment protection systems, structures and components are also included in the D-RAP/OPRAAs (refer to Subsection 17.4), which provides confidence that availability and reliability are designed into the plant and that availability and reliability are maintained throughout plant life through the maintenance rule."

The maintenance rule program is only one of several operational phase reliability assurance activities (OPRAAs). In the paragraph cited, only the maintenance rule program was identified as an activity to maintain availability and reliability. Please identify which other OPRAAs are relied upon to maintain availability and reliability, if any, and justify the adequacy of these activities to do so.

Westinghouse Response:

Westinghouse concurs that the Maintenance Rule is only one of several operational phase reliability assurance activities, as described in the proposed markup of DCD Subsection 17.4.4 contained on page 19 of 24 in Revision 1 of Technical Report Number 117, which was submitted to the NRC under Westinghouse letter DCP/NRC2075 dated January 29, 2008. The adequacy of the activities listed in the aforementioned mark-up of the DCD, is documented in TR-117 and its associated references.

DCD Rev.16 Subsection 16.3.1 will be revised as shown below.

AP1000 TECHNICAL REPORT REVIEW

Response to Request For Additional Information (RAI)

Design Control Document (DCD) Revision:

16.3.1 Investment Protection Short-Term Availability Controls

The importance of nonsafety-related systems, structures and components in the AP1000 has been evaluated. The evaluation uses PRA insights to identify systems, structures and components that are important in protecting the utilities investment and for preventing and mitigating severe accidents. To provide reasonable assurance that these systems, structures and components are operable during anticipated events short-term availability controls are provided. These investment protection systems, structures and components are also included in the D-RAP/MR-Program OPRAAs (refer to subsection 17.4), which provides confidence that availability and reliability are designed into the plant and that availability and reliability are maintained throughout plant life through the ~~maintenance rule~~ use of reliability assurance activities as listed in Subsection 17.4.4. Technical Specifications are not required for these systems, structures and components because they do not meet the selection criteria applied to the AP1000 (refer to subsection 16.1.1).

PRA Revision:

None.

Technical Report (TR) Revision:

None.

AP1000 TECHNICAL REPORT REVIEW

Response to Request For Additional Information (RAI)

RAI Response Number: RAI-SRP17.4-SPLA-02
Revision: 0

Question:

In TR117 Rev 1, section 17.4.1 "Introduction", Westinghouse states:

"The D-RAP, shown in Figure 17.4 1, is implemented during Design Certification. The D-RAP identifies risk significant SSCs for inclusion into the site Operational Phase Reliability Assurance Activities (OPRAAs) using probabilistic, deterministic, and other methods."

Please confirm that risk significant SSCs from the D-RAP, identified using probabilistic, deterministic, and other methods, are initially included in each of the OPRAAs, including the maintenance rule program.

Westinghouse Response:

Westinghouse confirms that risk significant SSCs from the D-RAP will be included in the OPRAAs, including the site Maintenance Rule Program, in accordance with the individual reliability assurance activity's scope and guideline document(s).

The site Maintenance Rule Program will incorporate all SSCs listed in DCD Table 17.4-1 in accordance with DCD Reference 17.6.10.

Design Control Document (DCD) Revision:

None

PRA Revision:

None

Technical Report (TR) Revision:

None