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Your ref: Docket No. 52-006
Our ref: DCP/NRC2162

June 20, 2008

Subject: AP1000 Response to Requests for Additional Information (SRP14.2)

Westinghouse is submitting a response to the NRC request for additional information (RAI) on SRP Section 14.2. 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-SRP14.2-CQVP-01 through -08 and -11, as sent in an email from Dave Jaffe to Sam Adams dated March 3, 2008. This response completes nine of eleven requests received to date for SRP Section 14.2. A response for RAI-SRP14.2-CQVP-09 and -10 is scheduled to be submitted by July 4, 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 14.2

cc: D. Jaffe - U.S. NRC 1E
E. McKenna - U.S. NRC 1E
P. Ray - TVA 1E
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ENCLOSURE 1

Response to Requests for Additional Information on SRP Section 14.2

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Response to Request For Additional Information (RAI)

RAI Response Number: RAI-SRP14.2-CQVP-01
Revision: 0

Question:

As stated in Section 14.4 of the Westinghouse's AP1000 Design Certification Document (DCD), combined license information item 14.4.3 requires applicants referencing the Westinghouse AP1000 DCD to provide administrative controls for the conduct of the initial test program in the form of a Startup Administrative Manual (SAM). It specifically states: "The Combined License applicant is responsible for a startup administration manual (procedure) which contains the administration procedures and requirements that govern the activities associated with the plant initial test program, as identified in Section 14.2.3." This COL information item calls for the actual submittal of a SAM that describes the methods and practices for administering the initial test program for the AP1000. Section 1.1 of Westinghouse's TR-71B states that the purpose of that document is to close combined license (COL) item 14.4.3 for conduct of the initial test program. Technical Report -71B attempts to address COL information item 14.4.3 by outlining proposed programmatic requirements and responsibilities for the plant groups involved in the startup and testing organization for the specified licensed operational facility. Further, Westinghouse states that TR-71B provides input to the development of the AP1000 Startup Administrative Manual, which will be completed at a later date.

In order to address COL information item 14.4.3, Westinghouse needs to provide a comprehensive AP1000 SAM (i.e., a revised/updated TR-71B), describing the methodology (on a generic basis) that will be implemented by applicants referencing the AP1000 DCD in the following areas:

- Initial test program objectives,
- Organizational and staffing responsibilities,
- Conduct of the initial test program,
- Initial test program planning and scheduling,
- Review, evaluation, and approval of test results,
- Conformance with Regulatory Guides (RGs),
- Utilization of reactor operating and testing experiences in test program development, and
- Trial use of plant operating and emergency procedures.

The approach described above would subsume COL information item 14.4.1, "Organization and Staffing," and COL information item 14.4.4, "Review and Evaluation of Test Results," into COL information item 14.4.3. Although Westinghouse can address the majority of the areas described above on a generic basis using the AP1000 SAM, there are certain areas that can only be resolved in light of site-specific or licensee-specific details. In areas in which Westinghouse cannot provide detailed information because site-specific information or licensee-specific details are needed, a COL action item will be identified in the staff's Safety Evaluation Report. Specifically, the COL applicant will be responsible for providing information in the following areas:

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- A description of the site-specific organizational structure, including the identification of principal participants and the degree of participation of each organizational unit, based on the general requirements contained in the AP1000 SAM. This COL information item can be closed by COL issuance if fully addressed by the COL applicant(s).
- A site-specific schedule, relative to the fuel loading date, for conducting each major phase of the test program, and for the development of test procedures (in the form of a license condition), based on the general provisions contained in the AP1000 SAM. This activity requires a license condition that will allow the Nuclear Regulatory Commission (NRC) inspection staff to review the actual test schedule and test sequencing proposed by the COL holder.

The identification of the above COL items and license condition(s) will allow the COL applicant to address this information in each site-specific SAM. Using this approach would allow the NRC staff to adequately address COL information items 14.4.1, 14.4.3, and 14.4.4, provided that Westinghouse submits the AP1000 SAM and the COL applicant provides all relevant information to address site-specific activities.

Westinghouse Response:

The scope of Technical Report TR-71B is only to address COL Information Item 14.4-3, and no other COL Information items. It is not Westinghouse's intent to address any other COL Information Items in this Technical Report. COL information items 14.4-1, "Organization and Staffing," and 14.4-4, "Review and Evaluation of Test Results," will be addressed separately in other Technical Reports.

Details of the specific Licensee's organization, including Preoperational and Startup testing, are provided in the COL in response to items in Chapter 13 and are explicitly addressed there.

Nor was Westinghouse's intention to provide a complete startup site administrative manual (SAM). As stated in TR-71B (Ref. 1), the COL applicant is responsible for a SAM which contains the administration procedures and requirements that govern activities associated with the initial test program. WEC provided a SAM Program Management Description, APP-GW-GBY-600 (Ref. 2) as Appendix A to TR-71B. The technical report is intended to provide descriptions of the key processes and controls that will address the SAM and associated licensing requirements for content and quality.

Summary responses to the bulleted items in this RAI are provided in Revision 2 of TR-71B, APP-GW-GLR-038.

References:

1. APP-GW-GLR-038, "AP1000 Conduct of Test Program", Technical Report 71B
2. APP-GW-GBY-600, "AP1000 Startup Site Administrative Manual – Program management Description", Revision 1

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Design Control Document (DCD) Revision:
None

PRA Revision:
None

Technical Report (TR) Revision:
As described above.

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Response to Request For Additional Information (RAI)

RAI Response Number: RAI-SRP14.2-CQVP-02
Revision: 0

Question:

Standard Review Plan (SRP) Section 14.2, paragraph II.3.A, "Management Organizations," states that the applicant should provide organizational descriptions of the principal management positions responsible for the planning, executing, and documenting preoperational and startup testing activities. Additionally, the applicant should provide organizational descriptions of any augmenting organizations or other personnel who will manage or execute any phase of the test program, and the responsibilities, interfaces, and authorities of the principal participants.

Section 3.0 of Appendix A to TR-71B contains information regarding the organizational structure that will be responsible for the conduct of the initial test program. Subsections 3.1 through 3.4 describe the structure and functions of the Joint Test Working Group, the Site Construction Group, the Site Preoperational Test Group, and the Site Startup Test Group.

Consistent with the SRP, the NRC staff requests that Westinghouse revise TR-71B to provide a generic description of the responsibilities, authorities, and interfaces of the organizations responsible for the overall administration and technical direction of the initial test program, in addition to the organizations described in Sections 3.1 through 3.4. This includes, but is not limited to:

- Licensee's Operations Group
- Licensee's Maintenance Group
- Licensee's Corrective Action Organization
- Licensee's Health Physics/Chemistry Group
- Licensee's Quality Assurance Group
- Construction BOP Engineering
- Construction Services Group
- Construction Services Procurement Group
- Construction Services Quality Group
- Construction Services Training Group
- Westinghouse Site Engineering Group
- Westinghouse Engineering Leads
- Preoperational and Startup Test Teams (including Startup Managers/Plant Managers/Startup Engineers, as applicable)

This description should also include consideration of staffing effects that could result from overlapping initial test programs at multi-unit sites.

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Response to Request For Additional Information (RAI)

Westinghouse Response:

See Revision 2 of TR-71B, APP-GW-GLR-038.

Reference:

1. APP-GW-GLR-038, "AP1000 Conduct of Test Program", Technical Report 71B, Revision 2

Design Control Document (DCD) Revision:

None

PRA Revision:

None

Technical Report (TR) Revision:

See TR-71B Revision 2.

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Response to Request For Additional Information (RAI)

RAI Response Number: RAI-SRP14.2-CQVP-03
Revision: 0

Question:

SRP Section 14.2, paragraph II.3.D, "Staff Responsibilities, Authorities, and Qualifications," states that the applicant should describe the education, training, and experience criteria established for each management and operating staff member—including the NSSS vendor, architect-engineer, and other major contractors, subcontractors, and vendors, as appropriate—who will conduct preoperational and startup tests and will develop testing, operating, and emergency procedures. In addition, the SRP states that the applicant should develop a training program for each functional group of employees in the organization relative to the schedule for preoperational testing and initial startup testing to ensure that the necessary plant staff is ready to begin the test program.

Consistent with the SRP, the NRC staff requests that Westinghouse revise TR-71B to provide a general description regarding the education, training, qualification, and experience criteria for organizations responsible for the conduct of preoperational and startup tests, and for organizations that will develop testing, operating, and emergency procedures. Additionally, the NRC staff requests that Westinghouse provide a general description regarding the development of a training program that will serve as supplemental training to the plant operators, consistent with Three Mile Island (TMI) Action Plan Item I.G.1 of NUREG-0660, NUREG-0694, and NUREG-0737.

Westinghouse Response:

For response to this RAI, see Revision 2 of TR-71B, APP-GW-GLR-038.

With respect to the following portion of this RAI:

"Additionally, the NRC staff requests that Westinghouse provide a general description regarding the development of a training program that will serve as supplemental training to the plant operators, consistent with Three Mile Island (TMI) Action Plan Item I.G.1 of NUREG-0660, NUREG-0694, and NUREG-0737."

These details are addressed by Sections 13.2 and 18.8 of the AP1000 DCD and their associated Technical Reports and are not addressed in this Technical Report 71B.

References:

1. APP-GW-T1P-500, AP1000 Plant Procedure Program Administrative Procedure
2. APP-GW-T1-500, Writers Guideline for AP1000 Preoperational Test Procedures and Test Specifications

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3. APP-GW-T1-600, AP1000 Writer's Guideline for Startup Test Procedures and Test Specifications
4. APP-GW-GJP-100, AP1000 Normal Operating Procedures (NOP) Writers Guideline
5. APP-GW-GJP-200, AP1000 Writers Guideline for Two Column Procedures
6. APP-GW-GLR-038, "AP1000 Conduct of Test Program", Technical Report 71B, Revision 2

Design Control Document (DCD) Revision:

None

PRA Revision:

None

Technical Report (TR) Revision:

See Revision 2 of TR-71B.

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Response to Request For Additional Information (RAI)

RAI Response Number: RAI-SRP14.2-CQVP-04

Revision: 0

Question:

SRP Section 14.2, paragraph II.3.C, "Test Program Schedule and Sequence," states that the applicant should develop a schedule for conducting each phase of the initial test program. Provisions should be in place to ensure that overlapping test program schedules (for multi-unit sites) do not result in significant divisions of responsibilities or dilutions of the staff implementing the test program. The sequential schedule for individual startup tests should establish that testing will be completed in accordance with plant technical specification requirements for SSC operability before changing plant modes. Additionally, the schedule should establish that the safety of the plant will not depend on the performance of untested SSCs. RG 1.68, Revision 3, provides guidance regarding the general scope that the NRC staff considers acceptable for initial test programs. Specifically, the RG states, in part, that applicants should develop realistic schedules for preparing detailed testing, plant operating, and emergency procedures. Schedules should be established for conducting the major phases of the test program relative to the expected fuel loading date. Additionally, the RG states that sufficient time should be scheduled to perform orderly and comprehensive testing. Previous applicants' schedules for conducting the preoperational and initial startup phases have typically allowed a minimum time of approximately 9 months and 3 months, respectively. Significantly shorter time periods should be justified.

Consistent with the above guidance, the NRC staff requests that Westinghouse revise TR-71B to provide a general description of the methodology that will be used to develop a schedule, relative to the fuel loading date, for conducting each major phase of the test program, and for the development of test procedures. This description should consider the following:

- Test Procedure Development Schedule:
 - o Controls to ensure the establishment of a schedule for the development of detailed testing, plant operating, and emergency procedures. These procedures should, to the extent practical, be trial-tested and corrected during the initial test program prior to fuel loading in order to establish their adequacy.
 - o Controls to ensure that approved test procedures be in a form suitable for review by NRC inspectors at least 60 days prior to their intended use or at least 60 days prior to fuel loading for fuel loading and startup test procedures.
 - o Controls to ensure that the COL holder provides timely notification to the NRC of changes in approved test procedures that have been made available for NRC review.

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- Initial Test Program Schedule:

- o Controls to ensure the establishment of a schedule to conduct the major phases of the initial test program, relative to the expected fuel loading date.
- o Controls to allow at least 9 months for conducting preoperational testing.
- o Controls to allow at least 3 months for conducting startup testing, including fuel loading, low-power tests, and power-ascension tests.
- o Controls to ensure that overlapping test program schedules (for multi-unit sites) do not result in significant divisions of responsibilities or dilutions of the staff provided to implement the test program.
- o Controls to ensure that the sequential schedule for individual startup tests establish, insofar as is practicable, that testing should be completed prior to exceeding 25 percent power for all plant Structure, Systems and Components (SSCs) that are relied upon to prevent, limit, or mitigate the consequences of postulated accidents. The schedule should establish that, insofar as is practicable, testing is accomplished as early in the test program as is feasible and that the safety of the plant not be dependent on the performance of untested SSCs.
- o Controls to provide identification and cross-reference of each test (or portions thereof) required to be completed before initial fuel loading to satisfy the requirements for completing ITAAC in accordance with 10 CFR 52.99(a).

Westinghouse Response:

See Revision 2 of TR-71B, APP-GW-GLR-038.

With respect to the following bullets in this RAI:

- “
 - o Controls to allow at least 9 months for conducting preoperational testing.
 - o Controls to allow at least 3 months for conducting startup testing, including fuel loading, low-power tests, and power-ascension tests.
 - o Controls to ensure that overlapping test program schedules (for multi-unit sites) do not result in significant divisions of responsibilities or dilutions of the staff provided to implement the test program.
 - o Controls to ensure that the sequential schedule for individual startup tests establish, insofar as is practicable, that testing should be completed prior to exceeding 25 percent

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power for all plant Structure, Systems and Components (SSCs) that are relied upon to prevent, limit, or mitigate the consequences of postulated accidents. The schedule should establish that, insofar as is practicable, testing is accomplished as early in the test program as is feasible and that the safety of the plant not be dependent on the performance of untested SSCs.”

The details, including the sequencing and appropriate duration, of the AP1000 Construction and Startup schedules are being addressed by the AP1000 Design-Centered Working group which includes NRC participation. The licensing constraints and requirements for the specific sequencing and durations within the AP1000 Construction and Startup schedule represented by the RAI comments above are not appropriately addressed by this Technical Report or COL Information item and are not within the scope of the AP1000 Design Certification licensing basis.

References:

1. APP-GW-GER-040, Summary Report for Start-up & Commissioning to Support AP1000 Plan of the Plan.
2. APP-GW-T1R-500, AP1000 ITAAC Preoperational Test Requirements Report
3. APP-GW-GLR-038, “AP1000 Conduct of Test Program”, Technical Report 71B, Revision 2

Design Control Document (DCD) Revision:

None

PRA Revision:

None

Technical Report (TR) Revision:

See Revision 2 of TR-71B.

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Response to Request For Additional Information (RAI)

RAI Response Number: RAI-SRP14.2-CQVP-05
Revision: 0

Question:

SRP Section 14.2, paragraph II.3.B, "Conduct of the Initial Test Program," states, in part, that the applicant should describe the administrative controls that govern the conduct of each major phase of the test program. This description should include the administrative controls used to ensure that necessary prerequisites are satisfied for each major phase and for individual tests. The applicant should also describe the methods to be followed in initiating plant modifications or maintenance tasks that are determined to be necessary to conduct the test program. This description should include the methods used to ensure retesting following such modifications or maintenance. In addition, the description should discuss the involvement of design organizations and the applicant in reviewing and approving proposed plant modifications. For preoperational testing, the description should also include methods and identify provisions to ensure that retesting for modifications or maintenance remains in compliance with ITAAC commitments. Finally, the applicant should describe the administrative controls pertaining to adherence to approved test procedures during the conduct of the test program as well as the methods for effecting changes to approved test procedures.

Consistent with the guidance described above, the NRC staff requests that Westinghouse revise TR-71B to provide a general description of the administrative controls to be implemented during the conduct of the initial test program. This description should include descriptions of the following activities:

- Controls to ensure that test prerequisites (such as completion of construction, construction or preliminary tests, and inspections) are satisfied for each major phase of the initial test program and individual systems and components, to ensure an orderly turnover of plant systems and components from construction forces or other preliminary checkout groups to the preoperational/startup testing groups,
- Controls for the establishment of hold points at selected milestones throughout the power ascension test phase, as appropriate,
- Controls to ensure adherence to approved test procedures during the conduct of the test program, and the methods for effecting changes to approved test procedures,
- Controls for plant modifications and repairs identified as a result of plant testing, considering retesting following such modifications or repairs, and review of any proposed facility modifications by the original design organization or other designated design organizations, as appropriate. The applicant's documentation associated with such controls should be auditable to allow the NRC to ensure proper implementation of those controls,

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- Controls to document, process, review, and disposition test deficiencies, nonconformances, and exceptions identified during the execution of the initial test program, including identification, implementation, and report of corrective actions to appropriate levels of management, and
- Controls to ensure the use of available information regarding operating experience, including reportable occurrences from other operating power reactors, to help minimize recurrence of significant problems that can be avoided by more complete testing.

Westinghouse Response:

See Revision 2 of TR-71B, APP-GW-GLR-038.

Reference:

1. APP-GW-GLR-038, "AP1000 Conduct of Test Program", Technical Report 71B

Design Control Document (DCD) Revision:

None

PRA Revision:

None

Technical Report (TR) Revision:

See Revision 2 of TR-71B.

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Response to Request For Additional Information (RAI)

RAI Response Number: RAI-SRP14.2-CQVP-06
Revision: 0

Question:

SRP Section 14.2, paragraph II.3.F, "Review, Evaluation, and Approval of Test Results," states, in part, that the applicant should describe the specific controls to be established for the review, evaluation, and approval of test results for each major phase of the program by appropriate personnel and/or organizations. This description should include specific controls to be established to ensure notification of responsible organizations or personnel when test acceptance criteria are not met, as well as the controls established to resolve such matters. Additionally, the applicant should also provide a description of the controls for approval of test data that will be applied for each major test phase before the licensee proceeds to the next test phase, and the controls that will ensure the approval of test data by qualified personnel at each power test plateau (e.g., during the power-ascension testing phase) before increasing the power level.

Consistent with the above guidance, the NRC staff requests that Westinghouse revise TR-71B to provide a general description of the administrative controls to be implemented for the review, evaluation, and approval of test results. This description should include descriptions of the following activities:

- Controls relating to the methodology for the approval of test data for each major phase (e.g., preoperational and initial startup testing), and the methods used for the review of individual parts of multiple tests (e.g., hot functional testing),
- Controls to ensure the notification and participation of responsible organizations in the resolution of design-related problems that result in, or contribute to, a failure to meet test acceptance criteria,
- Controls to ensure a technical evaluation of test results by qualified personnel and approval of such results by personnel in designated management positions in the applicant's organization, and
- Controls to ensure retention of test reports, including test procedures and results, as part of the plant historical records. Startup test reports should be prepared in accordance with RG 1.16, or the applicant should provide adequate justification for its proposed alternative.

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Westinghouse Response:

See Revision 2 of TR-71B, APP-GW-GLR-038.

Reference:

1. APP-GW-GLR-038, "AP1000 Conduct of Test Program", Technical Report 71B

Design Control Document (DCD) Revision:

None

PRA Revision:

None

Technical Report (TR) Revision:

See Revision 2 of TR-71B.

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Response to Request For Additional Information (RAI)

RAI Response Number: RAI-SRP14.2-CQVP-07
Revision: 0

Question:

Section 4.2 of Westinghouse's TR-71B, "Interface Control," provides an overview of the relationship among organizations responsible for the execution of the initial test program. This section briefly describes processes for the control of information among organizations, functional and physical interface controls, and documentation needs as part of the information that will be provided in the AP1000 SAM.

The NRC staff requests that Westinghouse revise TR-71B to expand, define, and clarify this information consistent with the guidance contained in RG 1.68 and SRP Section 14.2. Specifically, provide a general description of the methodology that will be used for the following activities:

- The control of internal and external transfer of information, design data, test results, documents, etc., from one AP1000 operating site organization to another, as proposed in Subsection 4.2.1 of TR-71B,
- The responsibilities and authority for overall control of the transfer of information among organizations, as proposed in Subsection 4.2.2 of TR-71B,
- The functional and physical interface controls involving SSCs, as proposed in Subsection 4.2.3 of TR-71B,
- The controls to assure that the scope and depth of the startup test program will provide clear, well documented, objective evidence that the tests have satisfied the criteria for validity of analytical bases, compatibility with technical specifications, compatibility with specified sequence for implementation, and plant equipment capability and reliability, as proposed in Subsection 4.2.4 of TR-71B, and
- The controls for the transmission of information associated with the startup test program among organizations, as proposed in Subsection 4.2.5 of TR-71B.

Additionally, these activities need to be integrated into the organizational structure described in Section 3.0 of TR-71B.

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Westinghouse Response:

See Revision 2 of TR-71B, APP-GW-GLR-038.

Reference:

1. APP-GW-GLR-038, "AP1000 Conduct of Test Program", Technical Report 71B

Design Control Document (DCD) Revision:

None

PRA Revision:

None

Technical Report (TR) Revision:

See Revision 2 of TR-71B.

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Response to Request For Additional Information (RAI)

RAI Response Number: RAI-SRP14.2-CQVP-08
Revision: 0

Question:

Section 4.3 of Westinghouse's TR-71B, "Startup Administrative Manual and Procedures used for Program Control," provides an outline of the standards that will govern the execution of activities associated with the conduct of the initial test program. The NRC staff requests that Westinghouse revise TR-71B to expand, define, and clarify this information consistent with the guidance contained in RG 1.68 and SRP Section 14.2. Specifically, provide a general description of the sections proposed for the SAM that are contained in Subsections 4.3.2.a through 4.3.2.l of TR-71B; and clarify how these activities relate to the organizational structure described in Section 3.0 of TR-71B.

Westinghouse Response:

See Revision 2 of TR-71B, APP-GW-GLR-038.

Reference:

1. APP-GW-GLR-038, "AP1000 Conduct of Test Program", Technical Report 71B, Revision 2

Design Control Document (DCD) Revision:

None

PRA Revision:

None

Technical Report (TR) Revision:

See Revision 2 of TR-71B.

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Response to Request For Additional Information (RAI)

RAI Response Number: RAI-SRP14.2-CQVP-11
Revision: 0

Question:

Staff Responsibilities, Authorities, and Qualifications

SRP Section 14.2, paragraph II.3.D, "Staff Responsibilities, Authorities, and Qualifications," states that the COL applicant should describe the education, training, and experience requirements established for each management and operating staff member—including the NSSS vendor, architect-engineer, and other major contractors, subcontractors, and vendors, as appropriate—who will conduct preoperational and startup tests and will develop testing, operating, and emergency procedures. In addition, the SRP states that the applicant should develop a training program for each functional group of employees in the organization relative to the schedule for preoperational testing and initial startup testing to ensure that the necessary plant staff is ready to begin the test program.

Consistent with the SRP, the NRC staff requests that Westinghouse revise TR-71B to include a general description regarding the development of a training program for each functional group of employees in the organization relative to the schedule for preoperational testing and initial startup testing to ensure that the necessary plant staff is ready to begin the test program.

Westinghouse Response:

See Revision 2 of TR-71B.

Reference:

1. APP-GW-GLR-038, "AP1000 Conduct of Test Program", Technical Report 71B, Revision 2

Design Control Document (DCD) Revision:

None

PRA Revision:

None

Technical Report (TR) Revision:

See TR-71B Revision 2.

