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Your ref: Docket No. 52-006  
Our ref: DCP/NRC2200

July 14, 2008

Subject: AP1000 Response to Request for Additional Information (SRP3.9.6)

Westinghouse is submitting a response to the NRC request for additional information (RAI) on SRP Section 3.9.6. 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-SRP3.9.6-CIB1-05, -06, and -07 as sent in an email from Mike Miernicki to Sam Adams dated April 2, 2008. This response completes three of twenty requests received to date for SRP Section 3.9.6.

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,

*for/ John T. DeBlasio*

Robert Sisk, Manager  
Licensing and Customer Interface  
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/Enclosure

1. Response to Request for Additional Information on SRP Section 3.9.6

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ENCLOSURE 1

Response to Request for Additional Information on SRP Section 3.9.6

# AP1000 TECHNICAL REPORT REVIEW

## Response to Request For Additional Information (RAI)

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RAI Response Number: RAI-SRP3.9.6-CIB1-05  
Revision: 0

### **Question:**

Clarify the applicability of the statement regarding throttling testing to the edition and addenda of the ASME OM Code referenced in the AP1000 DCD. TR 134 modifies the second paragraph in Subsection 3.9.6.2.1, "Valve Functions Tested," of Revision 16 to AP1000 DCD Tier 2 to state that testing of throttling (pressure regulation) is not required in the ASME OM Code.

### **Westinghouse Response:**

The sentence added to the second paragraph of 3.9.6.2.1 "Although the throttling function is included in the AP1000 inservice testing program, testing of throttling (pressure regulation) is not required in the ASME OM Code." is intended to clarify that while the testing of throttling is part of the AP1000 inservice testing it is recognized that it is not required by the ASME OM Code. This sentence does not alter applicability of the ASME Code. Unless otherwise stated the ASME OM Code used to develop the inservice testing plan for the AP1000 Design Certification is the 1995 Edition and 1996 Addenda and the statement about the throttling function does not alter that.

**Design Control Document (DCD) Revision:**  
None

**PRA Revision:**  
None

**Technical Report (TR) Revision:**  
None

# AP1000 TECHNICAL REPORT REVIEW

## Response to Request For Additional Information (RAI)

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RAI Response Number: RAI-SRP3.9.6-CIB1-06  
Revision: 0

### **Question:**

Correct the typographical error in the definition for Category D valves. TR 134 modifies the last paragraph in Subsection 3.9.6.2.1 of Revision 16 to AP1000 DCD Tier 2 to incorporate the definitions of the valve categories from the ASME OM Code. The NRC staff needs this information to perform its review of the proposed changes to the IST program description in the AP1000 DCD using the acceptance criteria in SRP Section 3.9.6.

### **Westinghouse Response:**

The word "on" following "capable of only" in the definition for Category D valves should be "one". The definition for Category D valves in Subsection 3.9.6.2.1 should be corrected as follows:

Category D – safety-related, explosively actuated valves and nonreclosing pressure relief devices (valves that are actuated by an energy source capable of only ~~on~~one operation, such as rupture disks or explosively actuated valves

### **Design Control Document (DCD) Revision:**

Revise Category D under 3.9.6.2.1 as follows

Category D – safety-related, explosively actuated valves and nonreclosing pressure relief devices (valves that are actuated by an energy source capable of only ~~on~~one operation, such as rupture disks or explosively actuated valves).

### **PRA Revision:**

None

### **Technical Report (TR) Revision:**

None

# AP1000 TECHNICAL REPORT REVIEW

## Response to Request For Additional Information (RAI)

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RAI Response Number: RAI-SRP3.9.6-CIB1-07  
Revision: 0

### **Question:**

Clarify the need for a COL applicant to request relief from or an alternative to the OM Code testing requirement with respect to position indication if the Code provisions are not satisfied. TR 134 modifies the second sentence under Remote Valve Position Indication Inservice Tests in Subsection 3.9.6.2.2 of Revision 16 to AP1000 DCD Tier 2 to state that the frequency for a position indication test will be once every 2 years unless otherwise justified.

### **Westinghouse Response:**

The AP1000 valves that require position indication testing, as documented in DCD Table 3.9-16, are identified as having a two year frequency. There is no requirement for a relief request or justification for a change in the frequency for these valves. Note that for pressure relief valves and explosively actuated valves, which do not require an exercise test, an alternate to a position indication test of testing position indication sensors by local inspection is identified and justified by Notes 5 and 7 to Table 3.9-17. A relief request for position indication is not needed for the baseline OM Code Edition and Addenda.

**Design Control Document (DCD) Revision:**  
None

**PRA Revision:**  
None

**Technical Report (TR) Revision:**  
None