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Your ref: Docket No. 52-006
Our ref: DCP/NRC2221

August 4, 2008

Subject: AP1000 Response to Request for Additional Information (SRP4)

Westinghouse is submitting a response to the NRC request for additional information (RAI) on SRP Section 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-SRP4.2-SRSB-01, as sent in an email from Phyllis Clark to Sam Adams dated May 8, 2008. This response completes all requests received to date for SRP Section 4. A response for RAI-SRP4.1-SRSB-01, RAI-SRP4.2-SRSB-02 through -06, RAI-SRP4.3-SRSB-01 and -02, and RAI-SRP4.4-SRSB-01 and -02 was submitted under letter DCP/NRC2193 dated July 3, 2008.

In addition to the RAI response provided under this letter, Westinghouse hereby withdraws its submittal of APP-GW-GLR-119, "AP1000 Design Control Document Chapter 4 Tier 2* Information," Technical Report Number 119, submitted under letter DCP/NRC1900 dated May 24, 2007.

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 Request for Additional Information on SRP Section 4

cc:	D. Jaffe	- U.S. NRC	1E
	E. McKenna	- U.S. NRC	1E
	P. Clark	- 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
	R. Grumbir	- NuStart	1E
	J. Monahan	- Westinghouse	1E

ENCLOSURE 1

Response to Request for Additional Information on SRP Section 4

AP1000 TECHNICAL REPORT REVIEW

Response to Request For Additional Information (RAI)

RAI Response Number: RAI-SRP4.2-SRSB-01
Revision: 0

Question:

Revision 16 of DCD Chapter 4 reclassifies the AP1000 core and fuel design Tier 2* items to Tier 2. TR 119 (APP-GW-GLR-119, Revision 0) is used to support the reclassification of the DCD Chapter 4 Tier 2* items to Tier 2. The basis for this change is the commitment to supply a future topical report, called the core reference report. While the submittal of a core reference report satisfies the Tier 2* requirement of NRC review of any changes to the DCD Tier 2* items, there is no support as to why it is appropriate to also reclassify these Tier 2* items themselves. It is contradictory to the original intent of making these items Tier 2* in that by reclassifying them to Tier 2, it appears changes could later be made to the submitted core reference report or even the DCD material without prior NRC approval.

Explain how the proposed submittal (core reference report) ensures that future changes for those items originally classified as Tier 2* will be reviewed and approved by the NRC?

Westinghouse Response:

As previously discussed with the NRC staff and reflected in recent staff comments, Westinghouse has committed to provide a generic Core Reference Report to address the final core and fuel design changes. The Core Reference Report will essentially be treated in the same manner as a Licensing Topical Report and will be submitted to the NRC for review and approval prior initial startup. Thus, the Core Reference Report will provide a standard reference to be used by COL license holders in the submittal of License Amendment Requests.

As a result, any changes to those items currently considered Tier 2* will be submitted to the NRC for review and approval in an AP1000 Core Reference Report prior to the initial startup with sufficient time for the NRC to complete their review.

Also consistent with the above RAI comments, Westinghouse agrees that changes to items that are considered Tier 2* are allowed to be re-submitted at a later date prior to startup for NRC approval, and acknowledges that submittal of a generic Core Reference Report satisfies the Tier 2* requirement of NRC review of any changes to the DCD Tier 2* items. Consequently, Westinghouse does not object to retaining the previous Tier 2* item designations.

Westinghouse continues to believe that the 10 CFR Part 52 change control process is more than adequate to control the changes to the generic DCD whether the information is classified as Tier 2 or Tier 2*, particularly in light of the fact that the proposed changes do not result in a change in design function, analysis, or analysis methodology. However, in order to fully address the above described concerns, Westinghouse will withdraw the request that Tier 2* items be reassigned to Tier 2 status in Chapter 4 of the topical report.

AP1000 TECHNICAL REPORT REVIEW

Response to Request For Additional Information (RAI)

Reference:

1. APP-GW-GLR-119, Rev. 0 (Technical Report 119)
2. APP-GW-GLR-059 / WCAP-16652-NP, "AP1000 Core & Fuel Design Technical Report"
3. RAI Response Number: RAI-TR18-SRSB-01

Design Control Document (DCD) Revision:

The Tier2* items re-classified in Technical Report 119 will be restored to their original classification in the next revision to the DCD.

PRA Revision:

None

Technical Report (TR) Revision:

None