

AP1000DCDFileNPEm Resource

From: David Jaffe
Sent: Tuesday, August 12, 2008 12:12 PM
To: Rhonda Carmon
Cc: Perry Buckberg
Subject: FW: RAI-SRP14.3-NWE2-01
Attachments: Doc2.doc

Please use this E-Mail as the acknowledgement for the attached question. Please enter in ADAMS and the RAI log.

Thanks

From: Lindgren, Donald A. [mailto:lindg1da@westinghouse.com]
Sent: Monday, August 04, 2008 11:58 AM
To: David Jaffe
Cc: Adams II, Samuel L.; Sisk, Robert B.
Subject: FW: RAI-SRP14.3-NWE2-01

We need to have a call on this.

I do not understand what making the definition "more restrictive" exactly means.

This definition is the same as the definition of as-built in NEI 08-01 which was worked out in the development of the documents in the CIP/ITAAC Workshops. We understood that the definition in NEI 08-01 is acceptable.

Donald Lindgren

Licensing Lead
Licensing and Customer Interface
(412) 374-4856

From: Adams II, Samuel L.
Sent: Friday, August 01, 2008 2:43 PM
To: Lindgren, Donald A.
Cc: 'John M. Oddo'; Loza, Paul G.; Sisk, Robert B.
Subject: FW: RAI-SRP14.3-NWE2-01

From: David Jaffe [mailto:David.Jaffe@nrc.gov]
Sent: Friday, August 01, 2008 11:06 AM
To: Adams II, Samuel L.
Cc: Rhonda Carmon; Perry Buckberg
Subject: RAI-SRP14.3-NWE2-01

Please acknowledge receipt of the attached RAI.

Hearing Identifier: AP1000_DCD_Review
Email Number: 70

Mail Envelope Properties (CEEA97CC21430049B821E684512F6E5E97B6343B09)

Subject: FW: RAI-SRP14.3-NWE2-01
Sent Date: 8/12/2008 12:12:00 PM
Received Date: 8/12/2008 12:12:18 PM
From: David Jaffe

Created By: David.Jaffe@nrc.gov

Recipients:
"Perry Buckberg" <Perry.Buckberg@nrc.gov>
Tracking Status: None
"Rhonda Carmon" <Rhonda.Carmon@nrc.gov>
Tracking Status: None

Post Office: HQCLSTR01.nrc.gov

| Files | Size | Date & Time |
|--------------|-------------|------------------------|
| MESSAGE | 1225 | 8/12/2008 12:12:18 PM |
| Doc2.doc | 21570 | |

Options
Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received:

Question RAI-SRP14.3-NWE2-01:

By letter dated June 13, 2008, Westinghouse submitted AP1000 DCD Impact Document APP-GW-GLE-007, Revision 0, "ITAAC Changes." One of the proposed changes to ITAAC would change the definition of "As-built." The proposed change would add the following to the definition of "As-built":

Determination of physical properties of the as-built structure, system, or component may be based on measurements, inspections, or tests that occur prior to installation provided that subsequent fabrication, handling, installation, and testing does not alter the properties.

On August 1, 2008, the Nuclear Energy Institute (NEI) submitted NEI 08-01, Rev. 0, "Industry Guidelines for ITAAC Closure Process Under 10 CFR Part 52" a draft of which was the basis for the proposed change to the definition of "As-built" in APP-GW-GLE-007. Section 3.1.4 of NEI 08-01 contains the following statement:

Many ITAAC require verification of "as-built" SSCs. However, some of these ITAAC will involve measurements and/or testing that can only be conducted at the vendor site due to the configuration of equipment or modules or the nature of the test (e.g., measurements of reactor vessel internals). For these specific items where access to the component for inspection or test is impractical after installation in the plant, the ITAAC closure documentation (e.g., test or inspection record) will be generated at the vendor site and provided to the licensee.

Please address why the proposed change to the definition of "As-built" should not be made more restrictive in light of the above-cited statement from NEI-08-01.