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MFN 08-615

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U.S. Nuclear Regulatory Commission
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Subject: Submittal of Response to Portion of NRC Request for Additional Information Letter No. 201 Related to ESBWR Design Certification Application - Human Factors Engineering - RAI Number 18.11-29 S02

The purpose of this letter is to submit a portion of the GE Hitachi Nuclear Energy (GEH) response to the U.S. Nuclear Regulatory Commission (NRC) Request for Additional Information (RAI) NRC letter No. 201 (Reference 1).

GEH's response to RAI 18.11-29 S01 was submitted via Reference 2 in response to the NRC's request in Reference 3. The original response to RAI 18.11-29 was submitted in Reference 4 in partial response to NRC Letter 74 (Reference 5).

If you have any questions or require additional information, please contact me.

Sincerely,

Richard E. Kingston
Vice President, ESBWR Licensing

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NRD

References:

1. MFN 08-499, Request for Additional Information Letter No.201 Related to ESBWR Design Certification Application, dated May 28, 2008
2. MFN 08-172, Response to Portion of NRC Request for Additional Information Letter Nos. 129 and 153 Related to ESBWR Design Certification Application – Human Factors Engineering - RAI Numbers 18.9-2 S01, 18.11-7 S01, 18.11-19 S01, 18.11-23 S01, 18.11-24 S01, 18.11- 26 S01, and 18.11-29 S01, dated April 16, 2008
3. MFN 08-130, Letter from U.S. Nuclear Regulatory Commission to Robert E. Brown, GEH, *Request For Additional Information Letter No. 153 Related To ESBWR Design Certification Application*, dated February 12, 2008
4. MFN 06-386, Request for Additional Information Letter No.74 Related to ESBWR Design Certification Application, dated October 11, 2006
5. MFN 06-446, *Response to Portion of NRC Request for Additional Information Letter No. 74 – ESBWR Human Factors Engineering, NEDO-33276, Rev. 0 HFE Verification and Validation Implementation Plan – RAI Numbers 18.11-1 through 18.11-33*, dated November 22, 2006

Enclosure:

1. MFN 08-615 - Response to Portion of NRC Request for Additional Information Letter No. 201 Related to ESBWR Design Certification Application - Human Factors Engineering - RAI Number 18.11-29 S02

cc: AE Cabbage USNRC (with enclosure)
RE Brown GEH/Wilmington (with enclosure)
DH Hinds GEH/Wilmington (with enclosure)
eDRF 0000-0088-2766

Enclosure 1

MFN 08-615

**Response to Portion of NRC Request for
Additional Information Letter No. 201
Related to ESBWR Design Certification Application
Human Factors Engineering
RAI Number 18.11-29 S02**

NRC RAI 18.11-29 S02

In their response to the RAI, GEH indicated that they will use the approach for evaluating simulation results based on EPRI NP-6560L. GEH refers to ". . . estimates of median response time and standard deviations associated the different types of cue response as measures of consistency between crews and individuals." GEH's response further states that "Acceptability of the MMIS clarity is that standard deviation falls within ranges of responses demonstrated in existing simulation for multiple crews." This approach does not seem to be consistent with all of the types of performance measures described in GEH's response to RAI 18.11-24 or the acceptance criteria which focused on average performance. Please clarify the application of the proposed approach with respect to the performance measures and the acceptance criteria proposed.

GEH Response

In MFN 08-172, GEH's response to RAI 18.11-29 was cited to provide a history and context with which to view GEH's response to RAI 18.11-29 S01. It appears that RAI 18.11-29 S02 was written against GEH's response to RAI 18.11-29 (MFN 08-172, pg. 54), not GEH's response to RAI 18.11-29 S01 (MFN 08-172, pps. 55-58).

The concerns presented in RAI 18.11-29 S02 are written against content that no longer appears in NEDE-33276P, Rev. 2. Therefore, these concerns are not applicable. GEH's approach to data analysis and interpretation is stated in GEH's response to RAI 18.11-29 S01 (MFN 08-172, pps. 55 - 58) and in NEDE-33276P, Rev. 2, Section 5.4.7.

DCD/LTR Impact

No DCD changes will be made in response to this RAI.

No changes to the subject LTR will be made in response to this RAI.