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Your ref: Docket No. 52-006  
Our ref: DCP/NRC2259

September 9, 2008

Subject: AP1000 Response to Request for Additional Information (SRP14.3)

Westinghouse is submitting a response to the NRC request for additional information (RAI) on SRP Section 14.3. 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-SRP14.3-NWE2-01 as sent in an email from Dave Jaffe to Sam Adams dated August 1, 2008. This response completes all requests received to date for SRP Section 14.3.

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,

  
Robert Sisk, Manager  
Licensing and Customer Interface  
Regulatory Affairs and Standardization

/Enclosure

1. Response to Request for Additional Information on SRP Section 14.3

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

Response to Request for Additional Information on SRP Section 14.3

# AP1000 TECHNICAL REPORT REVIEW

## Response to Request For Additional Information (RAI)

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RAI Response Number: RAI-SRP14.3-NWE2-01  
Revision: 0

### **Question:**

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.

### **Westinghouse Response:**

The proposed modification to the definition of as-built in Tier 1 of the AP1000 Design Control Document included in APP-GW-GL-007 makes it identical to the definition in NEI-08-01. NEI-08-01 is the result of a series of workshops organized by the NRC to develop an approach and guidance for closing ITAAC. Many hundreds of industry and NRC man-hours have been invested in this process. The revised definition was determined to be acceptable by the personnel involved in the workshops. As noted in SECY-08-0117 the staff plans to endorse NEI-08-01 in a Regulatory Guide.

# AP1000 TECHNICAL REPORT REVIEW

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As a result of these workshops we realized that the as-built definition in the AP1000 DCD was flawed and would result in request for exemptions as COL holders started to close ITAACs. The revised definition was developed to reduce or eliminate this need for exemptions to complete the ITAAC closures.

The request in this RAI to modify the definition by revision or application of a footnote to make the definition more restrictive increases the possibility of unintentionally requiring an exemption request to close an ITAAC. With the large number ITAAC and the variety of activities required to close ITAAC it is difficult to determine ahead of time, with specificity, how to define the difference among impossible, impracticable, unreasonable, and inconvenient for closure of ITAAC. For this reason we suggest that the as-built definition remain as proposed in APP-GW-GLE-007 and that the NRC concerns about excessive use of the ability to inspect away from the installed location be addressed in NRC guidance documents of COL implementation requirements.

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

None

### **PRA Revision:**

None

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

None