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U.S. Nuclear Regulatory Commission
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Subject: Response to Portion of NRC Request for Additional Information Letter No. 226, Related to ESBWR Design Certification Application - Auxiliary Systems - RAI Numbers 9.5-80 and 9.5-81

The purpose of this letter is to submit the GE Hitachi Nuclear Energy (GEH) response to the U.S. Nuclear Regulatory Commission Request for Additional Information (RAI) sent by NRC Letter 226, dated July 21, 2008 (Reference 1). The GEH response to RAI Numbers 9.5-80 and 9.5-81 are addressed in Enclosure 1.

Should you have any questions or require additional information regarding the information provided here, please contact me.

Sincerely,

Richard E. Kingston
Vice President, ESBWR Licensing

DC68
MRO

Reference:

1. MFN 08-589, Letter from U.S. Nuclear Regulatory Commission to Robert E. Brown, *Request for Additional Information Letter No. 226 Related to ESBWR Design Certification Application*, July 21, 2008.

Enclosure:

1. Response to Portion of NRC Request for Additional Information Letter No. 226 Related to ESBWR Design Certification Application - Auxiliary Systems - RAI Numbers 9.5-80 and 9.5-81

cc: AE Cabbage USNRC (with enclosures)
DH Hinds GEH (with enclosures)
RE Brown GEH (with enclosures)
eDRF 0000-0090-2765

Enclosure 1

MFN 08-725

**Response to Portion of NRC Request for
Additional Information Letter No. 226
Related to ESBWR Design Certification Application**

Auxiliary Systems

RAI Numbers 9.5-80 and 9.5-81

NRC RAI 9.5-80

DCD Tier 2, Subsection 9.5.1.15.4.2 describes requirements for fire brigade personnel. The description follows the guidance in RG 1.189, including the use of "should" statements. These should be changed to indicate that the recommendations are met by the plant/program design. For example, "the fire team advisor should possess an operator's license..." should be changed to "the fire team advisor possesses an operator's license".

GEH Response

GEH is providing the suggested training requirements of fire brigade personnel. It is GEH's position that the COL Holder should meet the requirements for fire brigade personnel as outlined in RG 1.189. Since the COL Holder is responsible for meeting this requirement, the COL Holder should make the definitive decision and commitment as to the level of training and qualification needed to be a member of the fire brigade. DCD Tier 2, Subsection 9.5.1.16 includes COL Holder Item 9.5.1-10-H to ensure adequate provisions are provided for manual firefighting capabilities. This COL Holder item ensures that the site fire brigade is trained and equipped for manual firefighting as referenced in RG 1.189, Regulatory Position 3.5.1.

DCD Impact

No change to the DCD will be made in response to this RAI.

NRC RAI 9.5-81

At the end of DCD Tier 2, Subsection 9.5.1.15.4.2 there is a list of two qualifications for fire brigade members. These are only two of several qualifications of fire brigade members and this should be clarified or combine all in one list.

GEH Response

DCD Tier 2, Subsection 9.5.1.15.4.2 states "the qualifications of the fire brigade personnel are described in Regulatory Guide 1.189, Regulatory Position 1.6.4.1". The two items identified are related to the physical requirements for being a fire brigade member. For consistency with RG 1.189, Regulatory Positions 1.6.1.b and 1.6.4.1, these requirements were clarified in DCD Revision 5 to state that the annual physical should include a determination that the fire brigade members are able to perform strenuous firefighting activities as requested under RAI 9.5-65 (MFN Letter 08-251 dated 2 April 2008).

DCD Impact

No change to the DCD will be made in response to this RAI.