

Request for Additional Information No. 121 (1489), Revision 0

10/29/2008

U. S. EPR Standard Design Certification
AREVA NP Inc.
Docket No. 52-020
SRP Section: 17.06 - Maintenance Rule
Application Section: FSAR 17.06

QUESTIONS for PRA Licensing, Operations Support and Maintenance Branch 1 (AP1000/EPR Projects) (SPLA)

17.06-1

As mentioned in NEI 07-02A [Revision 0], "Generic FSAR Template Guidance for Maintenance Rule Program Description for Plants Licensed under 10 CFR Part 52," dated March 2008, the industry operating experience (IOE) should be applied in various elements of the MRule program and procedure. The MRule Program should utilize IOE, where appropriate, for scoping, performance/condition criteria development, monitoring, goal-setting, corrective action, training, program assessment and maintenance and procurement activities.

EPR FSAR, Section 17.6 and Table 1.8-2, exclude the IOE COL action which should be addressed by the COL applicant. Please justify the exclusion or to include an additional COL action item on IOE to reflect conformance with NEI 07-02A guidance and its safety evaluation.