

Response to
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)

Question 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.

Response to Question 17.06-1:

As stated in U.S. EPR FSAR, Tier 2, Section 17.6, “A COL applicant that references the U.S. EPR design certification will describe the program for Maintenance Rule implementation.” Thus, the combined license (COL) applicant is responsible for applying IOE as part of the maintenance rule program.

FSAR Impact:

The U.S. EPR FSAR will not be changed as a result of this question.