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Your ref: Docket No. 52-006
Our ref: DCP/NRC2318

December 9, 2008

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

Westinghouse is submitting a response to the NRC request for additional information (RAI) on SRP Section 14. 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.

Enclosure 1 provides the response for the following RAI:

RAI-SRP14.3-NWE2-01, Rev 1

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,

A handwritten signature in black ink, appearing to read 'D. Sisk' followed by a large flourish and the letters 'FOR'.

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

/Enclosure

1. Response to Request for Additional Information on SRP Section 14

cc: D. Jaffe - U.S. NRC 1E
E. McKenna - U.S. NRC 1E
S. K. Mitra - U.S. NRC 1E
P. Ray - TVA 1E
P. Hastings - Duke Power 1E
R. Kitchen - Progress Energy 1E
A. Monroe - SCANA 1E
P. Jacobs - Florida Power & Light 1E
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ENCLOSURE 1

Response to Request for Additional Information on SRP Section 14

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Response to Request For Additional Information (RAI)

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

Revision: 1

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.

Subsequent to the submittal of Revision 0 of this response NRC personnel provided additional explanation for their concerns with the as-built definition.

Westinghouse Response:

Revision 1 of this RAI response addresses NRC comments about Revision 0 of this response. Revision 1 also reflects the inclusion of the revised as-built definition into Tier 1 of the DCD Revision 17.

The definition of as-built in Tier 1 of the AP1000 Design Control Document Revision 17 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



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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.

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 in Tier 1 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 in Tier 1 remain as provided in DCD Revision 17. The NRC concerns about excessive use of the ability to inspect away from the installed location are addressed in an additional write-up in DCD Section 14.3.

Design Control Document (DCD) Revision:

Add the following to the end of the write-up for 14.3.2.2 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC)

As-built- In the ITAAC table entries as-built means the physical properties of a structure, system, or component following the completion of its installation or construction activities at its final location at the plant site. 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.

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 inspection or test. For these specific items where access to the component for inspection or test is impracticable 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. Onsite activities for these ITAAC will likely be limited to receipt and placement of the component/module in its final location.

PRA Revision:

None



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Technical Report (TR) Revision:

None