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Your ref: Docket No. 52-006
Our ref: DCP/NRC2326

December 17, 2008

Subject: AP1000 Response to Request for Additional Information (SRP6)

Westinghouse is submitting a response to the NRC request for additional information (RAI) on SRP Section 6. 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-SRP6.4-SPCV-01.

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 'Robert Sisk'.

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

/Enclosure

1. Response to Request for Additional Information on SRP Section 6

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

Response to Request for Additional Information on SRP Section 6

AP1000 TECHNICAL REPORT REVIEW

Response to Request For Additional Information (RAI)

RAI Response Number: RAI-SRP6.4-SPCV-01

Revision: 0

Question:

NRC issued Generic Letter 2003-11 to alert addressees to findings that the control room licensing and design bases, and applicable regulatory requirements may not be met, and that existing specification surveillance requirements (SRs) may not be adequate.

In 2006, NRC staff approved modification to the standard technical specification (STS) (NUREGs 1430-1434) that were proposed by the pressurized and boiling water reactor owners groups Technical Specifications Task Force (TSTF), in STS change traveler TSTF-448 Rev. 3. TSTF 448 Rev. 3 addresses the trace gas surveillance, adding a Technical Specification Action for an inoperable Control Room Envelope (CRE), and by instituting a CRE Habitability Program that will ensure that CRE habitability is maintained.

DCD Rev. 16, Tier 2 Sections 6.4.5.1 and 6.4.5.4 commit to performing tracer gas testing during preoperational inspection and testing, and periodically during the life of the unit in accordance with Regulatory Guide 1.197; it also commits to perform follow up self-assessments. However, AP1000 generic technical specifications (GTS) do not contain a SR to measure unfiltered leakage into the CRE (the tracer gas test), required actions for an inoperable CRE boundary, and a CRE Habitability Program as approved by the NRC in STS generic change TSTF-448, "Control Room Habitability," Rev. 3.

Provide changes to the DCD or the justification for this deviation from the STS made by TSTF-448 in AP1000 DCD Chapter 16, "Technical Specifications."

Westinghouse Response:

As discussed in DCD 16.1.1, "...The content of the AP1000 Technical Specifications meets the 10CFR50.36 requirements and is consistent with the Technical Specification Improvement Program, NUREG 1431, Rev. 2, to the maximum extent possible. The content differs from NUREG 1431 only as necessary to reflect technical differences between the "typical" Westinghouse design and the AP1000 design."

The intent of this approach was to preclude accounting of individual post-Revision 2 TSTFs (including TSTF-448) to the generic AP1000 Technical Specifications since the 10CFR52 controls of operational requirements such as Technical Specifications can be modified subsequent to the receipt of the Combined Operating License to include the continuing stream of TSTFs approved for changes to NUREG-1431 during the COL review process. This approach simplifies the COL review process and was agreed to as part of the design certification approach, as reflected in the FSER approval of the generic AP1000 Technical Specifications.

AP1000 TECHNICAL REPORT REVIEW

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Any TSTF changes and improvements to Technical Specifications [considered as operational requirements in 10CFR52] beyond those incorporated into NUREG-1431, Revision 2, can be implemented by the COL applicant after receipt of the Combined Operating License and prior to actual plant startup, in accordance with 10CFR52.

Appendix D, Section VIII.C.6, specifies that "...After issuance of a license, the generic technical specifications have no further effect on the plant-specific technical specifications and changes to the plant-specific technical specifications will be treated as license amendments under 10CFR50.90."

However, AP1000 DCD Tier 2 Sections 6.4.5.2 and 6.4.5.4 along with generic AP1000 Technical Specification 3.7.6 address the appropriate requirements to satisfy the intent of GL 2003-01 and TSTF-448 relative to tracer gas surveillance and overall integrity of the MCR envelope.

Technical Report 27 (APP-GW-GLR-007, TR-27) was submitted in February 2007 to provide the bracketed open item information for MCR habitability testing frequency.

TR-27 also identified the required technical changes in the DCD to satisfy the requirements of Generic Letter 2003-01 and provide design conformance with Regulatory Guides 1.196 and 1.197.

TR-27 provided revisions to DCD Sections 6.4.5.1 (pre-operational testing) and 6.4.5.4 (periodic testing and self-assessment per RG 1.197) to perform the MCR envelope inleakage testing specified in ASTM E741, as well as committing to the testing and self-assessment frequency in Figure 1 of Regulatory Guide 1.197.

Since DCD Table 3.9-17 identifies the system level operability test requirements for the VES included in SR 3.7.6.10 and the associated Note 7 relates the requirements of DCD Sections 6.4.5.1 and 6.4.5.4, including the ASTM tracer gas inleakage testing performed in conjunction with the specified SR testing, the generic AP1000 Technical Specification requirements satisfy the requirements identified in the unincorporated TSTF-448 without the need to specifically modify the generic AP1000 Technical Specifications beyond the requirements approved in the FSER (NUREG-1793).

A specific exception to the intent of DCD 16.1.1 implementation philosophy, to add an explicit surveillance requirement to TS 3.7.6, was not implemented in TR-27 or in generic AP1000 Technical Specifications to maintain the stated implementation philosophy.

The addition of this SR can be incorporated when TSTF-448 is implemented for post-COL plant-specific updates.

AP1000 TECHNICAL REPORT REVIEW

Response to Request For Additional Information (RAI)

The TSTF intent of establishing the MCR habitability program is satisfied by the program requirements of DCD 6.4.5.

Design Control Document (DCD) Revision:

None

PRA Revision:

None

Technical Report (TR) Revision:

None