

**REQUEST FOR ADDITIONAL INFORMATION NO. 137-1688 REVISION 1**

12/22/2008

US-APWR Design Certification

Mitsubishi Heavy Industries

Docket No. 52-021

SRP Section: 17.06 - Maintenance Rule

Application Section: 17.6

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

17.06-1

In Section 17.6.1 ("Combined License Information") of the US-APWR DCD, Revision 1, the applicant provides combined license (COL) information item 17.6(1), which states "The COL applicant develops and implements the program for implementation of 10 CFR 50.65, the Maintenance Rule." It is not clear what is meant by "develops and implements" in COL information item 17.6(1). For example, COL information item 17.6(1) could incorrectly be interpreted as the COL applicant, during the COL application phase, will create and maintain maintenance rule program documents and implement the maintenance rule program in accordance with 10 CFR 50.65. These activities, however, are typically performed during the license holder phase.

Under 10 CFR 52.79 (a)(15) the COL applicant must provide in its final safety analysis report (FSAR) a description of the program, and its implementation, for monitoring the effectiveness of maintenance necessary to meet the requirements of 10 CFR 50.65 (also see Section 17.6, "Maintenance Rule", of NUREG-0800, Standard Review Plan). An acceptable description is provided in NEI 07-02A [Revision 0], "Generic FSAR Template Guidance for Maintenance Rule Program Description for Plants Licensed under 10 CFR Part 52."

The staff requests that the applicant clarify COL information item 17.6(1) in Section 17.6.1 of the US-APWR DCD, Revision 1, taking into consideration the comments provided herein (i.e., the COL applicant must provide in its FSAR a description of the maintenance rule program, and its implementation, for monitoring the effectiveness of maintenance necessary to meet the requirements of 10 CFR 50.65).