



**HITACHI**

**GE Hitachi Nuclear Energy**

**Richard E. Kingston**  
Vice President, ESBWR Licensing

PO Box 780  
3901 Castle Hayne Road, M/C A-55  
Wilmington, NC 28402 USA

T 910 819 6192  
F 910 362 6192  
rick.kingston@ge.com

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U.S. Nuclear Regulatory Commission  
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Washington, D.C. 20555-0001

Subject: **Response to Portion of NRC Request for Additional Information Letter No. 252 Related to ESBWR Design Certification Application RAI Number 14.3-432**

The purpose of this letter is to submit the GE Hitachi Nuclear Energy (GEH) Response to the U.S. Nuclear Regulatory Commission (NRC) Request for Additional Information (RAI) sent by NRC letter 252 dated September 16, 2008 (Reference 1).

Enclosure 1 contains the GEH response to RAI Number 14.3-432.

If you have any questions or require additional information, please contact me.

Sincerely,

Richard E. Kingston  
Vice President, ESBWR Licensing

References:

1. MFN 08-722, Letter from U.S. Nuclear Regulatory Commission to Mr. Robert E. Brown, GEH, *Request For Additional Information Letter No. 252 Related To ESBWR Design Certification Application*, dated September 16, 2008.

Enclosure:

1. Response to Portion of NRC Request for Additional Information Letter No. 252 Related to ESBWR Design Certification Application DCD Tier 1 RAI Number 14.3-432.

cc: AE Cabbage USNRC (with enclosure)  
RE Brown GEH/Wilmington (with enclosure)  
DH Hinds GEH/Wilmington (with enclosure)  
eDRF 0000-0095-4210 (RAI 14.3-432)

**MFN 08-971**

**Enclosure 1**

**Response to Portion of NRC Request for  
Additional Information Letter No. 252  
Related to ESBWR Design Certification Application**

**DCD Tier 1**

**RAI Number 14.3-432**

**NRC RAI 14.3-432**

*Provide definitions of the following terms used throughout Tier 1:*

- a) *Initiators*
- b) *Interfacing System*
- c) *Implementing System*

**GEH RESPONSE**

Regulatory Guide 1.206, Section C.II page C.II.1-3 provides the following guidance:

“The third column of the ITAAC table should identify the proposed specific acceptance criteria for the inspections, tests, or analyses described in column 2 that, if met, demonstrate that the licensee has met the design requirements/commitments in column 1. In general, the acceptance criteria should be objective and unambiguous in order to prevent misinterpretation. Numeric performance values for SSCs may be specified as ITAAC acceptance criteria when values consistent with the design commitments are possible or when failure to meet the stated acceptance criterion would clearly indicate a failure to properly implement the design (i.e., values selected for verification should be those assumed in the safety analyses, rather than the design values).”

These combinations of words or terms are not intended as stand alone terms intended to be used for a unique purpose but rather as descriptive terms that have been taken from the terminology used in NUREG-0800 as an effort to minimize ambiguity and prevent misinterpretation. These combinations of words are not defined in NUREG-0800 and are interpreted to be combinations of words of the English language that relay non-specific information rather than as phrases that have a specific meaning.

In all instances where the terms initiator, interfacing system, or implementing system are used in the ITAAC, the specific initiator, interfacing system, or implementing system being referred is specifically identified, in most cases in a table, and as such are defined to prevent ambiguity and misinterpretation. The term implementing system occurs only one time, appearing as footnote 2 to Table 2.2.14-3 where it specifically identifies/describes the footnoted items in the table as implementing systems.

In each instance where the terms initiator(s) or interfacing system are referenced in the ESBWR ITAAC acceptance criteria, the specific initiator or interfacing system applicable to the criteria is identified in a Table that is identified in the applicable design commitment.

Given that these items are specifically identified within the ITAAC so that there will be no ambiguity or misinterpretation in application of the acceptance criteria, any

attempt to generate a generic definition may create ambiguity or misinterpretation with respect to other regulatory guidance where similar terminology is used without a specific definition.

GEH believes that the initiators, interfacing systems, and implementing systems as stated in the ITAAC are clearly and unambiguously identified and defined as currently provided and no revision to the ITAAC is necessary.

**DCD IMPACT**

No DCD changes will be made in response to this RAI.