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**MITSUBISHI HEAVY INDUSTRIES, LTD.**  
16-5, KONAN 2-CHOME, MINATO-KU  
TOKYO, JAPAN

January 21, 2009

Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Attention: Mr. Jeffrey A. Ciocco

Docket No. 52-021  
MHI Ref: UAP-HF-09019

**Subject: MHI's Response to US-APWR DCD RAI No. 137-1688 REVISION 1**

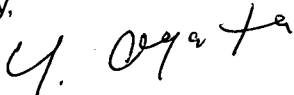
**Reference:** 1) "Request for Additional Information No. 137-1688 Revision 1, SRP Section: 17.06, Application Section: 17.6" dated December 22, 2008.

With this letter, Mitsubishi Heavy Industries, Ltd. ("MHI") transmits to the U.S. Nuclear Regulatory Commission ("NRC") a document entitled "Response to Request for Additional Information No. 137-1688 Revision 1."

Enclosed is the response to one RAI contained within Reference 1.

Please contact Dr. C. Keith Paulson, Senior Technical Manager, Mitsubishi Nuclear Energy Systems, Inc. if the NRC has questions concerning any aspect of the submittals. His contact information is below.

Sincerely,



Yoshiaki Ogata  
General Manager- APWR Promoting Department  
Mitsubishi Heavy Industries, LTD.

Enclosure:

1. Response to Request for Additional Information No. 137-1688 Revision 1

CC: J. A. Ciocco  
C. K. Paulson

Contact Information

C. Keith Paulson, Senior Technical Manager  
Mitsubishi Nuclear Energy Systems, Inc.  
300 Oxford Drive, Suite 301  
Monroeville, PA 15146  
E-mail: ck\_paulson@mnes-us.com  
Telephone: (412) 373-6466

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Docket No. 52-021  
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Enclosure 1

UAP-HF-09019  
Docket Number 52-021

Response to Request for Additional Information  
No. 137-1688 Revision 1

January 2009

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**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION**

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1/21/2009

**US-APWR Design Certification**

**Mitsubishi Heavy Industries**

**Docket No. 52-021**

**RAI NO.:** NO.137-1688 REVISION 1  
**SRP SECTION:** 17.06 - MAINTENANCE RULE  
**APPLICATION SECTION:** 17.6  
**DATE OF RAI ISSUE:** 12/22/2008

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**QUESTION NO. : 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).

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**ANSWER:**

The COL Information Item 17.6(1) in Section 17.6.1 of the US-APWR DCD, Revision 1, will be changed to "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. " in the US-APWR DCD, Revision 2.

Impact on DCD

DCD Tier 2, the COL information item 17.6(1) in Section 17.6 will be revised in Revision 2 as noted in the response to RAI 17.06-1.

COL 17.6(1)      *The COL applicant must ~~provide~~develops and implements in its FSAR a description of the maintenance rule program, and its for implementation, for monitoring the effectiveness of maintenance necessary to meet the requirements of 10 CFR 50.65, the Maintenance Rule.*

Impact on COLA

There is no impact on COLA from this RAI.

Impact on PRA

There is no impact on PRA from this RAI.