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Your ref: Docket No. 52-006
Our ref: DCP/NRC2364

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Subject: AP1000 ASME Code Citation Change

The current ASME Boiler and Pressure Vessel Code citation for the AP1000 found in Section 5.2 of the Design Control Document (DCD) specifies the use of a different Code Edition and Addenda for four of the subarticles than is specified for the balance of the Code. This is to be consistent with the requirements of 10 CFR 50.55a (b)(1)(iii). The primary concern of the NRC with the criteria in later versions of the code is with the rules for seismic design. The use of Code requirements from different editions and addenda is not consistent with ASME Code rules.

Westinghouse has discussed this issue with NRC and ASME Code representatives and revised the citation initially used for the AP1000 design certification. This change identified that the use of the alternate versions of the four articles applies only to the seismic design of piping. DCD Revision 17 included this revised DCD Citation. We have determined, based on revisions to 10 CFR 50.55a published in September 2008 and approval of an ASME Code Case, that a further refinement of the citation is needed. The latest changes to 10 CFR 50.55a were published as Revision 17 of the DCD was being finalized. The proposed refinement of the citation will permit the design and analysis of the AP1000 piping to satisfy the ASME Code rules on the use of a single Code edition and addenda and also be consistent with the requirements of 10 CFR 50.55a. The proposed revised citation incorporates the conformance with the limitations and modifications of CFR 50.55a (b)(1)(iii) as additional restrictions to the base ASME Code Edition and Addenda. The proposed changes to the ASME Code citation are shown in the mark up of the DCD shown below.

The ASME Code citation in Subsection 5.2.1.1 is included as Tier 2* information. NRC approval is requested for the change to Tier 2* information. The proposed DCD change shown below does not conform to the exact words of 10 CFR 50.55a. Westinghouse understands that the proposed DCD change meets the requirements in 10 CFR 50.55a (b)(1)(iii). Westinghouse requests NRC approval that the proposed DCD change satisfies the requirements in 10 CFR 50.55a (b)(1)(iii). Westinghouse expects that the approval will be documented in the FSER for the Design Certification amendment,

Revise the first three paragraphs of subsection 5.2.1.1 as follows:

5.2.1.1 Compliance with 10 CFR 50.55a

Reactor coolant pressure boundary components are designed and fabricated in accordance with the ASME Boiler and Pressure Vessel Code, Section III. A portion of the chemical and volume control system inside containment that is defined as reactor coolant pressure boundary uses an alternate classification in conformance with the requirements of 10 CFR 50.55a(a)(3). Systems other than the reactor coolant system connecting to the chemical and volume control system have required isolation and are not classified as reactor coolant pressure boundary. The alternate classification is discussed in Section 5.2.1.3. The quality group classification for the reactor coolant pressure boundary components is identified in subsection 3.2.2. The quality group classification is used to determine the appropriate sections of the ASME Code or other standards to be applied to the components.

The edition and addenda of the ASME Code applied in the design and manufacture of each component are the edition and addenda established by the requirements of the Design Certification. The use of editions and addenda issued subsequent to the Design Certification is permitted or required based on the provisions in the Design Certification. *[The baseline used for the evaluations done to support this safety analysis report and the Design Certification is the 1998 Edition, 2000 Addenda, with an additional restriction ~~except~~ for piping design, as follows: The restriction on piping design is that the treatment of dynamic loads, including seismic loads, in pipe stress analysis will satisfy the requirements of the ASME Code, Section III, Subarticles NB-3210, NB-3620, NB-3650, NC-3620, NC-3650, ND-3620 and ND-3650, 1989 Edition, 1989 Addenda, is used for Articles NB-3200, NB-3600, NC-3600, and ND-3600 in lieu of later editions and addenda for piping design.]*

The information provided in this letter is generic and applies to all COL applicants referencing the AP1000 design certification. The information provided above should permit the NRC to complete its schedule for the review of the AP1000 Design Certification amendment.

Questions related to the content and preparation of this letter 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,



Robert Sisk, Manager
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