


MITSUBISHI HEAVY INDUSTRIES, LTD.
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TOKYO, JAPAN

April 17, 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-09179

Subject: MHI's Responses to US-APWR DCD RAI No.258-2116 Revision 0

Reference: 1) "REQUEST FOR ADDITIONAL INFORMATION NO. 258-2116 REVISION 0, SRP Section: 06.06 - Inservice Inspection and Testing of Class 2 and 3 Components Application Section: Section 6.6.8, QUESTIONS for Component Integrity, Performance, and Testing Branch 1 (AP1000/EPR Projects)" dated March 4, 2009.

With this letter, Mitsubishi Heavy Industries, Ltd. ("MHI") transmits to the U.S. Nuclear Regulatory Commission ("NRC") a document entitled "Responses to Request for Additional Information No.258-2116 Revision 0."

Enclosed is the response to Question 06.06-4 that is 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,

Y. Ogata

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

Enclosure:

1. Responses to Request for Additional Information No.258 Revision 0

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

DOB/
NRO

Contact Information

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Enclosure 1

UAP-HF-09179
Docket No. 52-021

Responses to Request for Additional Information No.258-2116
Revision 0

April 2009

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

4/16/2009

US-APWR Design Certification

Mitsubishi Heavy Industries

Docket No. 52-021

RAI NO.: NO.258-2116 REVISION 0

SRP SECTION: "06.06 –INSERVICE INSPECTION AND TESTING OF CLASS 2 AND 3 COMPONENTS"

APPLICATION SECTION: 6.6.8

DATE OF RAI ISSUE: 3/04/2009

QUESTION NO. : 06.06-4

The U.S. APWR DCD, Tier 2, Section 6.6.8 states, "as noted in subsection 6.6.2, the design and installed arrangement of US-APWR Class 2 and 3 components provide clearance adequate to conduct Code-required examinations. The COL applicants are required to have administrative programs that ensure plant design translates accurately into the construction phase." Section 6.6.2 states that components are designed to allow personnel and equipment access to the extent practical to perform the required inservice examinations. The staff could not determine if the SRP acceptance criteria were met since the level of detail was not sufficient for the staff to reach a reasonable assurance determination. Please provide further description in the DCD to address how it is determined that access is provided in order to enable the performance of ISI examinations, the extent of examination during each interval for circumferential and longitudinal welds, whether inspection ports are provided when access is restricted due to guard pipes, and whether areas subject to examination are defined in accordance with Article IWC-2000, Examination Category C-F for Class 2 piping welds.

ANSWER:

Piping and pipe support locations, insulation, hangers, and stops are designed so as not to interfere with inspection equipment personnel. Where this cannot be done, the components will be easily and quickly removable with minimal special handling equipment.

Removable insulation and shielding will be provided on those piping systems requiring volumetric and surface examination. Removable hangers will be provided, as necessary and practical, to facilitate ISI. Working platforms will be provided in areas requiring inspection and servicing of pumps and valves. Temporary or permanent working platforms, walkways, scaffolding, and ladders will be provided to facilitate access to piping and component welds.

Portions of pressure retaining welds of Class 2 piping subject to examination are defined in accordance with ASME Section XI, IWC-2000, Examination Category C-F.

Impact on DCD

The DCD will be changed to incorporate the above as described in the ANSWER to QUESTION NO 06.06-2.

Impact on COLA

There is no impact on the COLA

Impact on PRA

There is no impact on the PRA

This completes MHI's response to the NRC's question.