REQUEST FOR ADDITIONAL INFORMATION 367-2419 REVISION 1

5/14/2009

US-APWR Design Certification

Mitsubishi Heavy Industries

Docket No. 52-021

SRP Section: 18 - Human Factors Engineering
Application Section: 18.8

QUESTIONS for Operating Licensing and Human Performance Branch (AP1000/EPR Projects) (COLP)

18-44

NUREG-0711, Section 9.4, Criterion 8 states:
A plan for procedure maintenance and control of updates should be developed. Procedure modifications should be integrated across the full set of procedures; alterations in particular parts of the procedures should not conflict nor be inconsistent with other parts.

Section 18.8.3 of the US-APWR DCD states:
Procedure modifications are integrated across the full set of procedures; alterations in particular parts of the procedures are made to be consistent with other parts. Changes to procedures are documented and analyzed for their potential impact on HSI. Any procedure implementation issues that negatively affect Human Performance are identified as HEDs. The HEDs are tracked and dispositioned.

In the second paragraph of section 18.8.3, the staff notes that the US-APWR Quality Assurance Plan is the vehicle for the maintenance and control of updates for the paper procedures and the CBPs. Section 18.8 of the US-APWR DCD does not provide a reference for this document. Please provide this document for staff review, so that the staff may verify the process for maintenance and control of updates for procedures meets criterion 8 in section 9.4 of NUREG-0711. If the QA plan is not available for review, please give the estimated date as to when the document will be available for review. Or, describe in detail the process to be used for maintenance and control of updates for paper based and computer based procedures.

Section 18.8.3 of the US-APWR DCD mostly restates the criterion in NUREG-0711 and does not demonstrate, with sufficient detail, **how** criterion 8 of NUREG-0711 section 9.4 will be met. The staff believes that information to meet this criterion should:

- Provide complete process descriptions
- Provide a flow diagram, or similar graphic example, that illustrates the relationship of the different process steps to each other (if applicable)
- Contain a description of the applicable technical requirements with sufficient quality, to enable the staff to verify that the product conforms to the intent of the methodology

Please provide detailed information to satisfy criterion 8 of NUREG-0711, section 9.4.