


MITSUBISHI HEAVY INDUSTRIES, LTD.
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TOKYO, JAPAN

June 12, 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-09307

Subject: MHI's Responses to US-APWR DCD RAI No. 365-2774 Revision 1

Reference: [1] "Request for Additional Information No. 365-1774 Revision 1, SRP
Section: 06.01.02 - Protective Coating Systems (Paints) - Organic
Materials Application Section: 6.1.2" dated May 14, 2009.

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. 365-2774 Revision 1".

Enclosure 1 is the responses to 1 question 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.

DOB 1
NLO

Enclosures:

1. Responses to Request for Additional Information No. 365-2774 Revision 1

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

Contact Information

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Enclosure 1

UAP-HF-09307
Docket No. 52-021

Responses to Request for Additional Information
No. 365-2774 Revision 1

June 2009

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

06/12/2009

**US-APWR Design Certification
Mitsubishi Heavy Industries, Ltd.
Docket No. 52-021**

RAI NO.: NO. 365-2774 REVISION 1
SRP SECTION: 6.1.2 – Protective Coating Systems (Paints) - Organic Materials
APPLICATION SECTION: 6.1.2
DATE OF RAI ISSUE: 05/14/2009

QUESTION NO.: 06.01.02-1

Background

SRP 6.1.2 (Review Procedures, p. 6.1.2-5) states that a DC applicant should include requirements and restrictions so as to meet the acceptance criteria. Also, SRP 6.1.2 (Areas of Review 4.) states that a DC applicant will address COL action items and requirements. Finally, Regulatory Guide 1.54 (and ASTM D 5144) gives specific guidance for Service Level I Coatings to meet acceptability criteria. DCD Section 6.1.2 contains little information about the type of coatings that will be installed in the plant, although in its response to RAI 45-876 Question 06.02.02-1, the applicant reiterates that all coatings will be DBA qualified (Reference 1). Furthermore, the applicant's response to RAI 263-2072 Question 06.02.02-12 provides Tier 1 ITAAC requirements (Reference 2). In this RAI, the staff requested the applicant to discuss the need for establishing a COL information item for COL applicants to identify DBA coatings requirements. However, the applicant did not mention the need for any COL items in its reply to RAI 263-2072 Question 06.02.02-12.

Requested Information

Provide specific requirements for a COL applicant to describe its DBA coatings and how it meets the acceptance criteria for coatings.

References

1. Letter from Yoshiki Ogata, MHI, to Jeffrey Ciocco, USNRC, dated August 26, 2008; Subject: MHI's Response to US_APWR DCD RAI No. 45-876 Docket No. 52-021 MHI Ref: UAP-HF-08152; Adams Accession No. ML082470054.
2. Enclosure 2 (ADAM Accession No. ML090030713) to letter from Yoshiki Ogata to NRC dated March 31, 2009, Subject: MHI's Responses to US-APWR DCD RAI No. 263-2072 (ADAMS Accession No. ML090930722)

ANSWER:

DCD Tier 2 subsection 6.1.2 and subsection 6.1.3 will be updated to address COL Applicant's responsibility for coating program during plant life to control the use of non-qualified coatings in containment to assure that the qualification of the strainer performance remains valid.

Refer to MHI's response to RAI No. 354-2585 question 06.02.02-34 for additional information regarding programmatic control of coating systems applied in the containment.

Impact on DCD

Add the following COL item to Subsection 6.1.3:

"COL 6.1(7) The COL Applicant is responsible to provide a coating program to inspect and monitor the use coating system in containment during plant life."

The above COL item will be updated incorporating MHI's response to RAI No. 354-2585 question 06.02.02-34 for additional information regarding programmatic control of coating systems applied in the containment.

Impact on COLA

The COLA shall be updated to address changes to the DCD for COL item 6.1(7).

Impact on PRA

There is no impact on the PRA.