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Your ref: Docket No. 52-006
Our ref: DCP_NRC_002533

June 17, 2009

Subject: AP1000 Response to Request for Additional Information (SRP 5)

Westinghouse is submitting a response to the NRC request for additional information (RAI) on SRP Section 5. This RAI response is submitted in support of the AP1000 Design Certification Amendment Application (Docket No. 52-006). The information included in this response is generic and is expected to apply to all COL applications referencing the AP1000 Design Certification and the AP1000 Design Certification Amendment Application.

Enclosure 1 provides the response for the following RAI(s):

RAI-SRP5.2.1-EMB-02 R1

Questions or requests for additional information related to the content and preparation of this response 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
Licensing and Customer Interface
Regulatory Affairs and Standardization

/Enclosure

1. Response to Request for Additional Information on SRP Section 5

| | | | |
|-----|-------------|-------------------------|----|
| cc: | D. Jaffe | - U.S. NRC | 1E |
| | E. McKenna | - U.S. NRC | 1E |
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ENCLOSURE 1

Response to Request for Additional Information on SRP Section 5

AP1000 TECHNICAL REPORT REVIEW

Response to Request For Additional Information (RAI)

RAI Response Number: RAI-SRP5.2.1-EMB-02

Revision: 1

Question:

In DCD Tier 2 Section 5.2.1.2, Westinghouse stated that use of any Code Case not approved in Regulatory Guides (RG) 1.84 and 1.85 on Class 1 components is authorized as provided in 50.55a(a)(3) and the requirements of the Design Certification. Westinghouse is requested to remove RG 1.85 from the DCD since it was withdrawn by the NRC in 2003.

In discussions with the NRC Staff subsequent to submitting Revision 0 Westinghouse agreed to revise the response to remove the reference to Regulatory Guide 1.85 in DCD Subsection 5.2.1.2.

Westinghouse Response:

Regulatory Guide 1.85 ~~is was~~ retained for historical reasons. Since the ASME Code used for the design of the AP1000 is the 1998 Edition, 2000 Addendum, there may be Code Cases included in Regulatory Guide 1.85 that are of interest. Any limitations or conditions on the use of a Code Case included in Regulatory Guide 1.85 would also be important. ASME Code Cases included in Regulatory Guide 1.85 and limitations or conditions on the use of a Code Cases included in Regulatory Guide 1.85 have been transferred to Regulatory Guide 1.84. Westinghouse has verified that the ASME Code, Section III Code Cases included in DCD Table 5.2-3 are addressed in Regulatory Guide 1.84. Also, note that the June 10, 2004 NRC letter that withdrew Regulatory Guide 1.85 stated that existing commitments based on the use of Reg. Guide 1.85 are not altered. The portions of Subsection 5.2.1.2 that reference Regulatory Guide 1.85 address the use of code cases not included in the DCD. Westinghouse agrees that reference to Regulatory Guide 1.85 should be removed from these portions of the subsection that deal with additions to the list of code cases used for the AP1000.

The DCD in Subsection 5.2.1.2 will be revised as shown below to remove the references to Regulatory Guide 1.85.

During the review of the DCD, as part of preparing this response, it was observed that the Section 1.9 and Appendix 1A cited different revisions of Regulatory Guide 1.84. The discussion of conformance to Regulatory Guide 1.84 in Appendix 1A will be revised as shown below to be consistent with the information in Table 1.9-1.

Design Control Document (DCD) Revision:

None

Revise the entry for Regulatory Guide 1.84 in Appendix 1A as follows:

AP1000 TECHNICAL REPORT REVIEW

Response to Request For Additional Information (RAI)

1. Introduction and General Description of Plant

AP1000 Design Control Document

| Criteria Section | Referenced Criteria | AP1000 Position | Clarification/Summary Description of Exceptions |
|------------------|---------------------|-----------------|---|
|------------------|---------------------|-----------------|---|

Reg. Guide 1.84, Rev. ~~3432~~, ~~5/996/03~~ – Design and Fabrication Code Case Acceptability ASME Section III Division 1

| | | | |
|---------|------------------------------------|----------|---|
| General | | Conforms | The ASME Code Cases required for design certification are listed in Table 5.2-3. These cases are included in Regulatory Guide 1.84 or have been accepted by the US Nuclear Regulatory Commission staff as part of the review of AP1000. |
| C.1 | ASME Code, Section III, Code Cases | Conforms | As applicable for pressurized water reactor. |
| C.2-5 | | Conforms | |

Revise Subsection 5.2.1.2 as follows:

5.2.1.2 Applicable Code Cases

[ASME Code Cases used in the AP1000 are listed in Table 5.2-3.]* In addition, other ASME Code Cases found in Regulatory Guides 1.84 ~~and 1.85~~, as discussed in Section 1.9 and Appendix 1A, in effect at the time of the Design Certification may be used for pressure boundary components. Use of Code Cases approved in revisions of the Regulatory Guides issued subsequent to the Design Certification may be used as discussed in subsection 5.2.6.1 by using the process outlined above for updating the ASME Code edition and addenda. Use of any Code Case not approved in Regulatory Guides 1.84 ~~and 1.85~~ on Class 1 components is authorized as provided in 50.55a(a)(3) and the requirements of the Design Certification.

The use of any Code Case conditionally approved in Regulatory Guides 1.84 ~~and 1.85~~ used on Class 1 components meets the conditions established in the Regulatory Guide.

PRA Revision:

None

Technical Report (TR) Revision:

None