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6/2/09
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August 4, 2009

Subject: WEC Comments on Draft Regulatory Guide DG-1191

Thank you for the opportunity to provide comments on Draft Regulatory Guide DG-1191. These comments are specific to the Westinghouse AP1000. You may be receiving additional comments from Westinghouse as the guide applies to operating reactors and from NuStart as the draft guide applies to new power plants.

Westinghouse has reviewed the Draft Regulatory Guide DG-1191 for application to the AP1000 Design Certification Amendment review. We have identified ASME Code Cases used in the AP1000 design that are not included in DG-1191. These Code Cases are being reviewed for the AP1000 and should be included in the next revision of Regulatory Guide 1.84.

The Code Cases being used in the AP1000 that should be considered for inclusion in the next revision of Regulatory Guide 1.84 are as follows:

- N-655-1 Use of SA-738, Grade B, for Metal Containment Vessels, Class MC, Section III, Division 1
- N-757-1 Alternative Rules for Acceptability for Class 2 and 3 Valves, NPS 1 (DN25) and Smaller with Welded and Nonwelded End Connections other than Flanges, Section III, Division 1
- N-759-2 Alternative Rules for Determining Allowable External Pressure and Compressive Stresses for Cylinders, Cones, Spheres, and Formed Heads, Section III, Division 1
- N-782 Use of Code Editions, Addenda, and Cases Section III, Division 1

N-759 (Revision 0) is included DG-1191. Westinghouse has included the latest version of the Code Cases for N-655, N-757, and N-759 in the AP1000 Design Control Document at the request of the NRC in RAI-SRP5.2.1-EMB-04.

These Code Cases have been the subject of Westinghouse letters to the NRC (DCP/NRC2402 March 13, 2009, DCP/NRC2452 April 28, 2009, and DCP/NC2519 June 8, 2009) and an RAI response (DCP/NRC2412 April 1, 2009 revised in DCP_NRC_002550 July 2, 2009). These letters and RAI response update Table 5.2-3 in the AP1000 Design Control Document. This table lists the Code Cases used in the design of the AP1000.

SUNSI Review Complete
Template = ADH-013

E-RIDS = ADH-03
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Very truly yours,



Robert Sisk, Manager
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