

# REQUEST FOR ADDITIONAL INFORMATION 447-3303 REVISION 1

9/1/2009

US-APWR Design Certification

Mitsubishi Heavy Industries

Docket No. 52-021

SRP Section: 14.03 - Inspections, Tests, Analyses, and Acceptance Criteria  
Application Section: SRP Sections 14.3.6, 14.3.7, 14.3.11, and 14.3.12

## QUESTIONS for Technical Specification Branch (CTSB)

14.03-1

ITAAC Item 2 in Table 2.8-1

The original RAI question 14.03.07-15 (RAI 1935, Q7651) stated the following:

*The reference for this ITAAC seems confusing. If everything is covered in Section 2.7.6.13, what is the need for this ITAAC?*

The applicant in its response stated the following: The description of the area radiation monitoring and airborne radioactivity monitoring systems is part of the radiation protection program. ITAAC Item 2 in Table 2.8-1 is provided as a cross-reference to the ITAAC and Design Description for the radiation monitoring systems because they support the radiation protection program.

The radiation program consists of shielding provided by permanent structures or additional shielding in some areas. That shielding reduces the maximum radiation levels in areas requiring occupancy or operator actions so that radiation doses are within the ALARA program. That shielding is permanent, so its impact on the radiation levels in any plant area is constant. The Area Radiation and Airborne Radioactivity Monitoring System contains the area radiation and airborne radioactivity monitors. ITAAC Item 2 as written can not be performed because an inspector would not have a way of determining when the ITA was performed or the AC met. A mere reference to a section in the DCD does not provide the means to know when either of those actions occurred. Typically, a reference ITAAC makes a reference to another ITAAC, so that when the ITAAC being referred to is completed, the ITAAC making a reference to it can be considered complete also. If this ITAAC is necessary, then it should refer to ITAAC in Table 2.7.6.13-3. The regulatory basis for these comments is 10 CFR 50.70 and 10 CFR 50, Appendix B, Criterion III, Design Control.

14.03-2

ITAAC Item 4 in Table 2.7.6.4-2

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The original RAI question 14.03.07-33 (RAI 1912, Q7576) stated the following:

*What is the rated capacity of the suspension hoist? That should be stated in the AC.*

The applicant in its response stated the following: ITAAC Item 4 in Table 2.7.6.4-2 verifies the suspension hoist load limit interlock prevents the hoist from lifting a load greater than its rated capacity. MHI believes the ITAAC as written provides adequate assurance that the ITAAC will verify acceptable performance of the interlock. The rated capacity of the suspension hoist is given in Tier 2 Table 9.1.5-1 Specification of the Spent Fuel Cask Handling Crane, and is the subject of RAI 200-1983, RAI SRP 9.1.4-12. The remainder of the applicant's response dealt with ITAAC Item 3 in Table 2.7.6.5-1 which is not pertinent of ITAAC Item 4 in Table 2.7.6.4-2.

For ITAAC Item 4 in Table 2.7.6.4-2, the staff wants to know why the rated capacity of the suspension hoist of 2 metric tons is not added after the word "capacity" in the AC of this ITAAC? The measureable value being referred to should be included in the AC of this ITAAC. The regulatory basis for these comments is 10 CFR 50.70 and 10 CFR 50, Appendix B, Criterion III, Design Control.