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Your ref: Docket No. 52-006  
Our ref: DCP\_NRC\_002534

September 30, 2009

Subject: Chapter 14 Open Items from SER

The purpose of this letter is to document the results of our telecom on March 11, 2009 relative to the draft SER with open items on Chapter 14.

- Westinghouse would remove reference to both TR-71A and 71B (APP-GW-GLR-037 AND 038) in the "Conforming" version of the AP1000 DCD. Westinghouse also agrees to remove any references to these documents providing full or partial closure of any COL Information Items, and to restore text that would make the COL Applicant or Holder provide the necessary information.

Attached are the pages that are impacted which depict highlighted portions that will be deleted. The changes will be made to the AP1000 DCD in the next revision.

- Regarding the "As-Built" Tier 2 definition which was changed in the AP1000 DCD, Revision 17 to allow consistency with NEI 08-01 and DG 1204 and the NRC request to re-classify this definition to be included in Tier 1.

Current Tier 1 definition:

*As-built means the physical properties of a structure, system, or component following the completion of its installation or construction activities at its final location at the plant site. Determination of physical properties of the as-built structure, system, or component may be based on measurements, inspections, or tests that occur prior to installation provided that subsequent fabrication, handling, installation, and testing does not alter the properties.*

This level of detail should not be included in Tier 1 thus Westinghouse feels that this re-classification could lead to different interpretations of the "As-Built" definition and would require an NRC exemption on future changes to address the interpretations.

Current Proposed Tier 2 definition:

**Add the following to the end of the write-up for 14.3.2.2 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC)**

**As-built-** In the ITAAC table entries as-built means the physical properties of a structure, system, or component following the completion of its installation or construction activities at its final location at the plant site. Determination of physical properties of the as-built structure, system, or component may be based on measurements, inspections, or tests that occur prior to installation provided that subsequent fabrication, handling, installation, and testing does not alter the properties.

Many ITAAC require verification of as-built SSCs. However, some of these ITAAC will involve measurements and/or testing that can only be conducted at the vendor site due to the configuration of equipment or modules or the nature of the inspection or test. For these specific items where access to the component for inspection or test is ~~impracticable~~ impractical after installation in the plant, the ITAAC closure documentation (e.g., test or inspection record) will be generated at the vendor site and provided to the licensee. Onsite activities for these ITAAC will likely be limited to receipt and placement of the component/module in its final location.

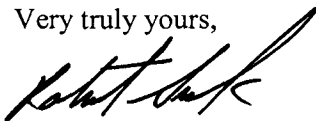
This definition was provide as our response to RAI-SRP14.3-NWE2-01R1

Westinghouse recommendation is that making the definition for "As-Built" information a Tier 2\* not only provides the appropriate NRC oversight but also would prohibit the potential for requiring an exemption to the Design Certification. (OI-SRP 14.3-NWE2-01)

This would closeout the three open items related to Chapter 14.

If you have any questions, please feel free to contact me 412 374-6206.

Very truly yours,



Robert Sisk, Manager  
Licensing and Customer Interface  
Regulatory Affairs and Standardization

Enclosure

cc: Dave Jaffe - NRC  
Eileen McKenna - NRC  
Ed Schmeich - Westinghouse  
Bob Hirmanpour - Excel  
Rich Grumbir - Excel

ENCLOSURE 1

Attached DCD Revision Pages with changes highlighted in yellow are the text that will be deleted to provide closure to open items OI-SRP 14.2-CQVP-12 and OI-SRP 14.2-CQVP-13.

**14.4 Combined License Applicant Responsibilities**

This section describes the Combined License applicant's and holder's responsibilities required to perform the AP1000 plant initial test program.

**14.4.1 Organization and Staffing**

The specific staff, staff responsibilities, authorities, and personnel qualifications for performing the AP1000 initial test program are the responsibility of the Combined License applicant. This test organization is responsible for the planning, executing, and documenting of the plant initial testing and related activities that occur between the completion of plant/system/component construction and commencement of plant commercial operation. Transfer and retention of experience and knowledge gained during initial testing for the subsequent commercial operation of the plant is an objective of the test program.

**14.4.2 Test Specifications and Procedures**

The Combined License information requested in this subsection has been partially addressed in APP-GW-GLR-037 (Reference 1), and the applicable changes are incorporated into the DCD. Test Specifications have been developed as indicated in Reference 1 and are available for NRC onsite review at Westinghouse's offices.

The Combined License holder will provide the Preoperational and Startup Procedures for the NRC prior to each planned test in accordance with the requirements of DCD subsection 14.2.3.

The following words represent the original Combined License Information Item commitment:

The Combined License applicant is responsible for providing test specifications and test procedures for the preoperational and startup tests, as identified in subsection 14.2.3, for review by the NRC.

**14.4.3 Conduct of Test Program**

The Combined License information requested in this subsection has been partially addressed in APP-GW-GLR-038 (Reference 2), and the applicable changes are incorporated into the DCD.

The program management description for the process to develop the AP1000 Startup Administrative Manual is delineated in APP-GW-GLR-038 (Reference 2).

The Combined License holder is responsible for a site-specific startup administration manual (procedure), which contains the administration procedures and requirements that govern the activities associated with the plant initial test program, as identified in subsection 14.2.3 and as described in APP-GW-GLR-038 (Reference 2).

**14.4.7 References**

1. APP-GW-GLR-037, "AP1000 Test Specifications and Procedures," Westinghouse Electric Company LLC.
2. APP-GW-GLR-038, "AP1000 Conduct of Test Program," Westinghouse Electric Company LLC.

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\*NRC Staff approval is required prior to implementing a change in this information; see DCD Introduction Section 3.5.