

## ArevaEPRDCPEm Resource

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**From:** Tesfaye, Getachew  
**Sent:** Tuesday, January 19, 2010 12:57 PM  
**To:** 'usepr@areva.com'  
**Cc:** Miernicki, Michael; Gilles, Nanette; Wilson, Jerry; Colaccino, Joseph; ArevaEPRDCPEm Resource  
**Subject:** U.S. EPR Design Certification Application RAI No. 358 (4265), FSAR Ch. 14  
**Attachments:** RAI\_358\_NARP\_4265.doc

Attached please find the subject request for additional information (RAI). A draft of the RAI was provided to you on January 11, 2010, and on January 19, 2010, you informed us that the RAI is clear and no further clarification is needed. As a result, no change is made to the draft RAI. The schedule we have established for review of your application assumes technically correct and complete responses within 30 days of receipt of RAIs. For any RAI that cannot be answered within 30 days, it is expected that a date for receipt of this information will be provided to the staff within the 30 day period so that the staff can assess how this information will impact the published schedule.

Thanks,  
Getachew Tesfaye  
Sr. Project Manager  
NRO/DNRL/NARP  
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**Hearing Identifier:** AREVA\_EPR\_DC\_RAIs  
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Request for Additional Information No. 358(4265), Revision 1

1/19/2010

U. S. EPR Standard Design Certification

AREVA NP Inc.

Docket No. 52-020

SRP Section: 14.03 - Inspections, Tests, Analyses, and Acceptance Criteria

Application Section: FSAR Tier 1, ITAAC Tables

QUESTIONS for EPR Projects Branch (NARP)

14.03-15

**Follow-up to RAI 182, Question No. 14.03-10**

In your response to RAI 182, supplement 4, Question 14.03-10, Part E, you revised the definition of "as-built" in Section 1.1 of DCD Tier 1 to the following:

**As-built** means the physical properties of the SSC 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 do not alter the properties.

This definition will be used in implementing the inspection, test, analyses, and acceptance criteria (ITAAC) verification process. Your proposed change to the definition of "as-built" concerns the NRC staff because the NRC expects that verifications will be performed in the final, in-place location of the SSC except in cases where it is technically justifiable to perform the verification elsewhere. The staff has raised these concerns during public meetings with representatives of the Nuclear Energy Institute (NEI) and design certification applicants. The NRC staff understands that it may be impossible to perform some ITAAC verifications of an SSC in its final, in-place location. Therefore, the staff and NEI have agreed to a proposal to modify the definition of "as-built" as follows:

**As-built** means the physical properties of a structure, system, or component following completion of its installation or construction activities at its final location at the plant site. In cases where it is technically justifiable, determination of physical properties of the as-built structure, sub-system, or component may be based on measurements, inspections, or tests that occur prior to installation, provided that subsequent fabrication, handling, installation, and testing do not alter the properties.

NEI has committed to provide guidance on this new definition in the next revision of NEI-08-01, "Industry Guideline for ITAAC Closure Process Under 10 CFR Part 52," planned to be completed in mid 2010. The NRC staff is encouraging all vendors who currently have definitions of "as-built" that are unacceptable to the NRC to adopt this new definition. Provide your proposed revision to the definition of "as-built" to address the staff's concerns discussed above.