

REQUEST FOR ADDITIONAL INFORMATION 674-5162 REVISION 0

12/13/2010

US-APWR Design Certification

Mitsubishi Heavy Industries

Docket No. 52-021

SRP Section: 16 - Technical Specifications

Application Section: 5.5.18 and 5.5.19

QUESTIONS for Technical Specification Branch (CTSB)

16-302

Supplemental RAI on GTS 5.5.18 and GTS 5.5.19:

- (1) At the time of COL issuance the plant-specific technical specifications (PTS) must be complete, implementable, and not contain any open COL action items, as noted in COL/DC-ISG-8, "Technical Specification Information that Combined License Applicants Must Provide in Combined License Applications." Therefore, for COL applicants (i.e., Comanche Peak) to adopt the Risk Management Technical Specification (RMTS) Initiative 4b, Risk-Informed Completion Times (RICT), and Initiative 5b, Surveillance Frequency Control Program (SFCP), any necessary revisions to the requirements documents NEI 06-09, NEI 04-10, Regulatory Guide (RG) 1.174, and RG 1.177, and development of any supplemental documentation will need to be completed by the time of the final safety evaluation report (SER) for COL issuance. In addition, the process (methodology) for preparing the PRA in support of the RMTS initiatives must be established at COL issuance, since the PRA compliant with 10 CFR 50.71(h)(1) may not be complete until shortly before fuel load.
- (2) Acceptance of Generic Technical Specifications (GTS) 5.5.18 and GTS 5.5.19 for the MHI DCD will remain open until issues are resolved relating to RG 1.1.74 and RG 1.177 as referenced in NEI 06-09 Revision 0 and NEI 04-10 Revision 1 relating to the differing risk profiles of the new reactors. In the DCD GTS the NEI guidance/requirements documents can be bracketed (i.e., [NEI 06-09 Revision 0] and [NEI 04-10 Revision 1]), thereby allowing a COL applicant to insert the appropriate revision number if revisions are required to those documents or to RG 1.174 and RG 1.177, or if supplemental documentation needs to be developed later. Consider bracketing NEI 06-09 Revision 0 and NEI 04-10 Revision 1 to resolve this DCD GTS open item. A COL applicant will not be able to adopt either GTS 5.5.18 or GTS 5.5.19 until issues are resolved relating to RG 1.1.74, RG 1.177, and referenced in NEI 06-09 Revision 0 and NEI 04-10 Revision 1.
- (3) GTS 5.5.18 paragraph b is not strictly in accordance with NEI 06-09 Revision 0, section 2.3.1 paragraph 5. Either paragraph b needs to state, "The RICT shall be recalculated prior to exceeding the most limiting technical specification front-stop CT, but not later than 12 hours from the plant configuration change," or, since this is redundant to NEI 06-09 Revision 0, paragraph b can be deleted. A third alternative would be for the paragraph b to simply state, "The RICT shall be recalculated whenever plant configuration change occurs, in accordance with NEI 06-09."

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For example, in order to facilitate necessary TS changes to accommodate the RMTS initiatives, revisions are necessary to the DCD TS, such as the following:

DCD TS Revisions

1. Add to TS 5.5.18 paragraph c.3, "PRA model to meet the technical adequacy requirements of NEI 06-09 and [ISG on PRA development]",
2. In TS 5.5.18 paragraph a, bracket "[NEI 06-09 (Revision y)/ and supplemental documentation]."
3. In TS 5.5.19 paragraph b, bracket : "[NEI 04-10, "Risk-Informed Method for Control of Surveillance Frequencies," Revision z/ and supplemental documentation]."
4. Revise TS 5.5.18 paragraph b to state "The RICT shall be recalculated whenever plant configuration change occurs, ~~within 12 hours from the configuration change~~ in accordance with NEI 06-09."