

ArevaEPRDCPEm Resource

From: Tesfaye, Getachew
Sent: Wednesday, February 02, 2011 4:12 PM
To: 'usepr@areva.com'
Cc: Bongarra, James; Walker, Jacqwan; Pieringer, Paul; Junge, Michael; Ford, Tanya; Colaccino, Joseph; ArevaEPRDCPEm Resource
Subject: U.S. EPR Design Certification Application RAI No. 472 (5462), FSAR Ch. 18
Attachments: RAI_472_COLP_5387_5462.doc

Attached please find the subject requests for additional information (RAI). A draft of the RAI was provided to you on February 2, 2011, and on the same day on February 2, 2011, 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 RAIs 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
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Hearing Identifier: AREVA_EPR_DC_RAIs
Email Number: 2502

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From: Tesfaye, Getachew

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Request for Additional Information No. 472(5462), Revision 0

2/2/2011

U. S. EPR Standard Design Certification
AREVA NP Inc.
Docket No. 52-020
SRP Section: 18 - Human Factors Engineering
Application Section: FSAR Chapter 18

QUESTIONS for Operating Licensing and Human Performance Branch (AP1000/EPR Projects) (COLP)

18-238

FSAR Treatment of Operational Programs for Training and Procedures

SECY-05-0197 designated training of plant operators and staff (including operator requalification) as an operational program required by regulation (or license condition) for a combined license (COL) application. SECY-05-0197 further identifies that training is an operational program that is addressed by SRP Chapter 13, Conduct of Operations.

The NRC Staff has reviewed training, as an operational program and COL responsibility, in its safety evaluation for Chapter 13, (specifically, sections 13.2.1, and 13.2.2). SECY-05-0197 established the regulatory position that training, as an operational program, is the COL applicant's responsibility to address and not the responsibility of the design certification applicant. Additionally, under certain conditions (e.g., see 10CFR 55.59 (c)), a licensee may or may not use the SAT process to meet certain training-related requirements. Thus, specifying, in the FSAR, that a COL must use a SAT process conflicts with current regulation. Therefore, the Staff requests AREVA to reconcile any discrepancies in the Chapter 18 FSAR (and related IPs) that dictate certain training responsibilities in the design certification which are the COL applicant responsibility, as an operational program, according to SECY-05-0197.

The Staff notes that this same rationale applies to the procedures element currently identified in the applicant's Chapter 18 FSAR and related IP.