

ArevaEPRDCPEm Resource

From: WELLS Russell (AREVA) [Russell.Wells@areva.com]
Sent: Monday, March 28, 2011 3:33 PM
To: Tesfaye, Getachew
Cc: HUDSON Greg (AREVA); BUDZIK Dennis (AREVA); BENNETT Kathy (AREVA); DELANO Karen (AREVA); HALLINGER Pat (EXTERNAL AREVA); ROMINE Judy (AREVA); RYAN Tom (AREVA); WILLIFORD Dennis (AREVA)
Subject: DRAFT Response to U.S. EPR Design Certification Application RAI No. 442, FSAR Ch. 7, Question 7.1-30
Attachments: RAI 442 Question 07.01-30 Reponse US EPR DC - DRAFT.pdf

Getachew,

Attached is a draft response for RAI No. 442, FSAR Ch. 7, Question 7.1.30 as shown below in advance of the April 28, 2011 final date.

Let me know if the staff has questions or if this can be sent as a final response.

Thanks,

Russ Wells

U.S. EPR Design Certification Licensing Manager

AREVA NP, Inc.

3315 Old Forest Road, P.O. Box 10935

Mail Stop OF-57

Lynchburg, VA 24506-0935

Phone: 434-832-3884 (work)

434-942-6375 (cell)

Fax: 434-382-3884

Russell.Wells@Areva.com

From: WELLS Russell (RS/NB)
Sent: Tuesday, March 15, 2011 12:51 PM
To: 'Tesfaye, Getachew'
Cc: BENNETT Kathy (RS/NB); DELANO Karen (RS/NB); ROMINE Judy (RS/NB); RYAN Tom (RS/NB)
Subject: Response to U.S. EPR Design Certification Application RAI No. 442, FSAR Ch. 7, Supplement 6

Getachew,

On November 19, 2010, AREVA NP Inc. (AREVA NP) provided a schedule for a technically correct and complete response to the questions in RAI 442. Supplement 1 response was sent on January 7, 2011 to provide a revised schedule for four of the questions. Supplement 2 response was sent on February 9, 2011 to provide a revised schedule. Supplement 3 response was sent on February 18, 2011 to provide technically correct and complete responses to four questions. Supplement 4 response was sent on February 25, 2011 to provide technically correct and complete response to one question. Supplement 5 response was sent on March 2, 2011 to provide technically correct and complete responses to three of the 12 remaining questions. Based on discussions with NRC, the attached file, "RAI 442 Supplement 6 Response US EPR DC.pdf" provides technically correct and complete responses to two of the 9 questions, as committed.

The following table indicates the respective pages in the response document, "RAI 442 Supplement 6 Response US EPR DC.pdf," that contain AREVA NP's response to the subject questions.

| Question # | Start Page | End Page |
|------------------|------------|----------|
| RAI 442 07.01-32 | 2 | 3 |
| RAI 442 07.09-67 | 4 | 5 |

AREVA NP's schedule for providing a technically correct and complete response to the remaining questions in RAI 442 remains unchanged and is provided below.

| Question # | Response Date |
|------------------|----------------|
| RAI 442 — 7.1-26 | April 21, 2011 |
| RAI 442 — 7.1-27 | April 14, 2011 |
| RAI 442 — 7.1-28 | April 7, 2011 |
| RAI 442 — 7.1-30 | April 28, 2011 |
| RAI 442 — 7.1-31 | April 7, 2011 |
| RAI 442 — 7.3-32 | April 14, 2011 |
| RAI 442 — 7.9-64 | April 28, 2011 |

Sincerely,

Russ Wells

*U.S. EPR Design Certification Licensing Manager
AREVA NP, Inc.*

3315 Old Forest Road, P.O. Box 10935

Mail Stop OF-57

Lynchburg, VA 24506-0935

Phone: 434-832-3884 (work)

434-942-6375 (cell)

Fax: 434-382-3884

Russell.Wells@Areva.com

From: WELLS Russell (RS/NB)

Sent: Wednesday, March 02, 2011 4:52 PM

To: Tesfaye, Getachew

Cc: BENNETT Kathy (RS/NB); DELANO Karen (RS/NB); ROMINE Judy (RS/NB); RYAN Tom (RS/NB)

Subject: Response to U.S. EPR Design Certification Application RAI No. 442, FSAR Ch. 7, Supplement 5

Getachew,

On November 19, 2010, AREVA NP Inc. (AREVA NP) provided a schedule for a technically correct and complete response to the questions in RAI 442. Supplement 1 response was sent on January 7, 2011 to provide a revised schedule for four of the questions. Supplement 2 response was sent on February 9, 2011 to provide a revised schedule. Supplement 3 response was sent on February 18, 2011 to provide technically correct and complete responses to four questions. Supplement 4 response was sent on February 25, 2011 to provide technically correct and complete response to one question. Based on discussions with NRC, the attached file, "RAI 442 Supplement 5 Response US EPR DC.pdf" provides technically correct and complete responses to three of the 12 questions, as committed.

The following table indicates the respective pages in the response document, "RAI 442 Supplement 5 Response US EPR DC.pdf," that contain AREVA NP's response to the subject question.

| Question # | Start Page | End Page |
|------------------|------------|----------|
| RAI 442 07.03-33 | 2 | 2 |
| RAI 442 07.03-34 | 3 | 4 |
| RAI 442 07.09-61 | 5 | 8 |

AREVA NP's schedule for providing a technically correct and complete response to all questions in RAI 442 remains unchanged and is provided below.

| Question # | Response Date |
|------------------|----------------|
| RAI 442 — 7.1-26 | April 21, 2011 |
| RAI 442 — 7.1-27 | April 14, 2011 |
| RAI 442 — 7.1-28 | April 7, 2011 |
| RAI 442 — 7.1-30 | April 28, 2011 |
| RAI 442 — 7.1-31 | April 7, 2011 |
| RAI 442 — 7.1-32 | April 7, 2011 |
| RAI 442 — 7.3-32 | April 14, 2011 |
| RAI 442 — 7.9-64 | April 28, 2011 |
| RAI 442 — 7.9-67 | April 7, 2011 |

Sincerely,

Russ Wells

U.S. EPR Design Certification Licensing Manager

AREVA NP, Inc.

3315 Old Forest Road, P.O. Box 10935

Mail Stop OF-57

Lynchburg, VA 24506-0935

Phone: 434-832-3884 (work)

434-942-6375 (cell)

Fax: 434-382-3884

Russell.Wells@Areva.com

From: WELLS Russell (RS/NB)

Sent: Friday, February 25, 2011 8:07 AM

To: Tesfaye, Getachew

Cc: BRYAN Martin (External RS/NB); BENNETT Kathy (RS/NB); DELANO Karen (RS/NB); ROMINE Judy (RS/NB); RYAN Tom (RS/NB)

Subject: Response to U.S. EPR Design Certification Application RAI No. 442, FSAR Ch. 7, Supplement 4

Getachew,

On November 19, 2010, AREVA NP Inc. (AREVA NP) provided a schedule for a technically correct and complete response to the questions in RAI 442. Supplement 1 response was sent on January 7, 2011 to provide a revised schedule for four of the questions. Supplement 2 response was sent on February 9, 2011 to

provide a revised schedule. Supplement 3 response was sent on February 18, 2011 to provide technically correct and complete responses to four questions. Based on discussions with NRC, the attached file, "RAI 442 Supplement 4 Response US EPR DC.pdf" provides technically correct and complete responses to one of the 13 questions, as committed.

Appended to this file are affected pages of the U.S. EPR Final Safety Analysis Report and Technical Report ANP-10309P, in redline-strikeout format which support the response to RAI 442 Question 07.09-63.

The following table indicates the respective pages in the response document, "RAI 442 Supplement 4 Response US EPR DC.pdf," that contain AREVA NP's response to the subject question.

| Question # | Start Page | End Page |
|------------------|------------|----------|
| RAI 442 07.09-63 | 2 | 2 |

Based upon the information presented to the NRC during the February 15, 2011, Public Meeting, the schedule for the remaining questions has been changed.

AREVA NP's schedule for providing a technically correct and complete response to all questions in RAI 442 is provided below.

| Question # | Response Date |
|------------------|----------------|
| RAI 442 — 7.1-26 | April 21, 2011 |
| RAI 442 — 7.1-27 | April 14, 2011 |
| RAI 442 — 7.1-28 | April 7, 2011 |
| RAI 442 — 7.1-30 | April 28, 2011 |
| RAI 442 — 7.1-31 | April 7, 2011 |
| RAI 442 — 7.1-32 | April 7, 2011 |
| RAI 442 — 7.3-32 | April 14, 2011 |
| RAI 442 — 7.3-33 | April 7, 2011 |
| RAI 442 — 7.3-34 | April 7, 2011 |
| RAI 442 — 7.9-61 | April 7, 2011 |
| RAI 442 — 7.9-64 | April 28, 2011 |
| RAI 442 — 7.9-67 | April 7, 2011 |

Sincerely,

Russ Wells

U.S. EPR Design Certification Licensing Manager

AREVA NP, Inc.

3315 Old Forest Road, P.O. Box 10935

Mail Stop OF-57

Lynchburg, VA 24506-0935

Phone: 434-832-3884 (work)

434-942-6375 (cell)

Fax: 434-382-3884

Russell.Wells@Areva.com

From: BRYAN Martin (External RS/NB)
Sent: Friday, February 18, 2011 12:21 PM
To: Tesfaye, Getachew
Cc: DELANO Karen (RS/NB); ROMINE Judy (RS/NB); BENNETT Kathy (RS/NB); RYAN Tom (RS/NB)
Subject: Response to U.S. EPR Design Certification Application RAI No. 442, FSAR Ch. 7, Supplement 3

Getachew,

On November 19, 2010, AREVA NP Inc. (AREVA NP) provided a schedule for a technically correct and complete response to the questions in RAI 442. Supplement 1 response was sent on January 7, 2011 to provide a revised schedule for four of the questions. Supplement 2 response was sent on February 9, 2011 to provide a revised schedule. Based on discussions with NRC, the attached file, "RAI 442 Supplement 3 Response US EPR DC.pdf" provides technically correct and complete responses to four of the 17 questions, as committed.

Appended to this file are affected pages of the U.S. EPR Final Safety Analysis Report and Technical Report ANP-10281P, in redline-strikeout format which support the response to RAI 442 Question 07.01-29.

The following table indicates the respective pages in the response document, "RAI 442 Supplement 3 Response US EPR DC.pdf," that contain AREVA NP's response to the subject questions.

| Question # | Start Page | End Page |
|-------------------|-------------------|-----------------|
| RAI 442 07.01-29 | 2 | 2 |
| RAI 413 07.09-62 | 3 | 4 |
| RAI 413 07.09-65 | 5 | 5 |
| RAI 413 07.09-66 | 6 | 6 |

The schedule for technically correct and complete responses to the remaining 13 questions is unchanged and provided below:

AREVA NP's schedule for providing a technically correct and complete response to all questions in RAI 442 is provided below.

| Question # | Response Date |
|-------------------|----------------------|
| RAI 442 — 7.1-26 | March 15, 2011 |
| RAI 442 — 7.1-27 | March 15, 2011 |
| RAI 442 — 7.1-28 | March 15, 2011 |
| RAI 442 — 7.1-30 | March 15, 2011 |
| RAI 442 — 7.1-31 | March 15, 2011 |
| RAI 442 — 7.1-32 | March 15, 2011 |
| RAI 442 — 7.3-32 | March 15, 2011 |
| RAI 442 — 7.3-33 | March 15, 2011 |
| RAI 442 — 7.3-34 | March 15, 2011 |
| RAI 442 — 7.9-61 | March 15, 2011 |
| RAI 442 — 7.9-63 | March 15, 2011 |
| RAI 442 — 7.9-64 | March 15, 2011 |
| RAI 442 — 7.9-67 | March 15, 2011 |

Sincerely,

Martin (Marty) C. Bryan
U.S. EPR Design Certification Licensing Manager
AREVA NP Inc.
Tel: (434) 832-3016
702 561-3528 cell
Martin.Bryan.ext@areva.com

From: BRYAN Martin (External RS/NB)
Sent: Wednesday, February 09, 2011 5:07 PM
To: Tesfaye, Getachew
Cc: DELANO Karen (RS/NB); ROMINE Judy (RS/NB); BENNETT Kathy (RS/NB); RYAN Tom (RS/NB)
Subject: Response to U.S. EPR Design Certification Application RAI No. 442, FSAR Ch. 7, Supplement 2

Getachew,

On November 19, 2010, AREVA NP Inc. (AREVA NP) provided a schedule for a technically correct and complete response to the questions in RAI 442. Supplement 1 response was sent on January 7, 2011 to provide a revised schedule for four of the questions. To allow additional time to interact with the staff and to process the responses a revised schedule is provided below. It should be noted that the dates below may need to be adjusted following the February 15, 2011 public meeting between AREVA and the NRC on digital instrumentation and controls.

AREVA NP's schedule for providing a technically correct and complete response to all questions in RAI 442 is provided below.

| Question # | Response Date |
|-------------------|----------------------|
| RAI 442 — 7.1-26 | March 15, 2011 |
| RAI 442 — 7.1-27 | March 15, 2011 |
| RAI 442 — 7.1-28 | March 15, 2011 |
| RAI 442 — 7.1-29 | March 15, 2011 |
| RAI 442 — 7.1-30 | March 15, 2011 |
| RAI 442 — 7.1-31 | March 15, 2011 |
| RAI 442 — 7.1-32 | March 15, 2011 |
| RAI 442 — 7.3-32 | March 15, 2011 |
| RAI 442 — 7.3-33 | March 15, 2011 |
| RAI 442 — 7.3-34 | March 15, 2011 |
| RAI 442 — 7.9-61 | March 15, 2011 |
| RAI 442 — 7.9-62 | March 15, 2011 |
| RAI 442 — 7.9-63 | March 15, 2011 |
| RAI 442 — 7.9-64 | March 15, 2011 |
| RAI 442 — 7.9-65 | March 15, 2011 |
| RAI 442 — 7.9-66 | March 15, 2011 |
| RAI 442 — 7.9-67 | March 15, 2011 |

Sincerely,

Martin (Marty) C. Bryan

U.S. EPR Design Certification Licensing Manager
AREVA NP Inc.
Tel: (434) 832-3016
702 561-3528 cell
Martin.Bryan.ext@areva.com

From: BRYAN Martin (External RS/NB)
Sent: Friday, January 07, 2011 11:15 AM
To: Tesfaye, Getachew
Cc: DELANO Karen (RS/NB); ROMINE Judy (RS/NB); BENNETT Kathy (RS/NB); RYAN Tom (RS/NB); PANNELL George (CORP/QP)
Subject: Response to U.S. EPR Design Certification Application RAI No. 442, FSAR Ch. 7, Supplement 1

Getachew,

On November 19, 2010, AREVA NP Inc. (AREVA NP) provided a schedule for a technically correct and complete response to the questions in RAI 442. To allow additional time to interact with the staff a revised schedule is provided below for questions 7.1.29, 7.1.32, 7.9-65 and 7.9-67. The schedule for the other questions remains unchanged.

AREVA NP's schedule for providing a technically correct and complete response to all questions in RAI 442 is provided below.

| Question # | Response Date |
|-------------------|-------------------------|
| RAI 442 — 7.1-26 | March 15, 2011 |
| RAI 442 — 7.1-27 | March 15, 2011 |
| RAI 442 — 7.1-28 | March 15, 2011 |
| RAI 442 — 7.1-29 | February 9, 2011 |
| RAI 442 — 7.1-30 | February 9, 2011 |
| RAI 442 — 7.1-31 | March 15, 2011 |
| RAI 442 — 7.1-32 | February 9, 2011 |
| RAI 442 — 7.3-32 | February 9, 2011 |
| RAI 442 — 7.3-33 | February 9, 2011 |
| RAI 442 — 7.3-34 | March 15, 2011 |
| RAI 442 — 7.9-61 | February 9, 2011 |
| RAI 442 — 7.9-62 | February 9, 2011 |
| RAI 442 — 7.9-63 | February 9, 2011 |
| RAI 442 — 7.9-64 | March 15, 2011 |
| RAI 442 — 7.9-65 | March 15, 2011 |
| RAI 442 — 7.9-66 | February 9, 2011 |
| RAI 442 — 7.9-67 | February 9, 2011 |

Sincerely,

Martin (Marty) C. Bryan
U.S. EPR Design Certification Licensing Manager
AREVA NP Inc.
Tel: (434) 832-3016
702 561-3528 cell
Martin.Bryan.ext@areva.com

From: BRYAN Martin (External RS/NB)
Sent: Friday, November 19, 2010 5:12 PM
To: 'Tefaye, Getachew'
Cc: DELANO Karen (RS/NB); ROMINE Judy (RS/NB); BENNETT Kathy (RS/NB); PANNELL George (CORP/QP)
Subject: Response to U.S. EPR Design Certification Application RAI No. 442, FSAR Ch. 7

Getachew,

Attached please find AREVA NP Inc.'s response to the subject request for additional information (RAI). The attached file, "RAI 442 Response US EPR DC.pdf" provides a schedule since a technically correct and complete response to the 17 question (s) is not provided.

The following table indicates the respective pages in the response document, "RAI 442 Response US EPR DC.pdf," that contain AREVA NP's response to the subject questions.

| Question # | Start Page | End Page |
|------------------|------------|----------|
| RAI 442 — 7.1-26 | 2 | 2 |
| RAI 442 — 7.1-27 | 3 | 3 |
| RAI 442 — 7.1-28 | 4 | 4 |
| RAI 442 — 7.1-29 | 5 | 5 |
| RAI 442 — 7.1-30 | 6 | 6 |
| RAI 442 — 7.1-31 | 7 | 8 |
| RAI 442 — 7.1-32 | 9 | 9 |
| RAI 442 — 7.3-32 | 10 | 10 |
| RAI 442 — 7.3-33 | 11 | 11 |
| RAI 442 — 7.3-34 | 12 | 12 |
| RAI 442 — 7.9-61 | 13 | 13 |
| RAI 442 — 7.9-62 | 14 | 14 |
| RAI 442 — 7.9-63 | 15 | 15 |
| RAI 442 — 7.9-64 | 16 | 16 |
| RAI 442 — 7.9-65 | 17 | 17 |
| RAI 442 — 7.9-66 | 18 | 18 |
| RAI 442 — 7.9-67 | 19 | 19 |

A complete answer is not provided for the 17 questions. The schedule for a technically correct and complete response to these questions is provided below.

| Question # | Response Date |
|------------------|------------------|
| RAI 442 — 7.1-26 | March 15, 2011 |
| RAI 442 — 7.1-27 | March 15, 2011 |
| RAI 442 — 7.1-28 | March 15, 2011 |
| RAI 442 — 7.1-29 | January 7, 2011 |
| RAI 442 — 7.1-30 | February 9, 2011 |
| RAI 442 — 7.1-31 | March 15, 2011 |
| RAI 442 — 7.1-32 | January 7, 2011 |
| RAI 442 — 7.3-32 | February 9, 2011 |
| RAI 442 — 7.3-33 | February 9, 2011 |
| RAI 442 — 7.3-34 | March 15, 2011 |
| RAI 442 — 7.9-61 | February 9, 2011 |
| RAI 442 — 7.9-62 | February 9, 2011 |

| | |
|------------------|------------------|
| RAI 442 — 7.9-63 | February 9, 2011 |
| RAI 442 — 7.9-64 | March 15, 2011 |
| RAI 442 — 7.9-65 | January 7, 2011 |
| RAI 442 — 7.9-66 | February 9, 2011 |
| RAI 442 — 7.9-67 | January 7, 2011 |

Sincerely,

Martin (Marty) C. Bryan
U.S. EPR Design Certification Licensing Manager
AREVA NP Inc.
Tel: (434) 832-3016
702 561-3528 cell
Martin.Bryan.ext@areva.com

From: Tesfaye, Getachew [mailto:Getachew.Tesfaye@nrc.gov]
Sent: Wednesday, October 20, 2010 8:09 AM
To: ZZ-DL-A-USEPR-DL
Cc: Zhao, Jack; Morton, Wendell; Mott, Kenneth; Spaulding, Deirdre; Truong, Tung; Zhang, Deanna; Jackson, Terry; Canova, Michael; Colaccino, Joseph; ArevaEPRDCPEm Resource
Subject: U.S. EPR Design Certification Application RAI No. 442(4295,5076,5068,5067), FSAR Ch. 7

Attached please find the subject requests for additional information (RAI). A draft of the RAI was provided to you on September 10, 2010, and discussed with your staff on October 13, 2010. Draft RAI Questions 07.01-26 and 07.03-33 were modified as a result of that discussion. 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
Sr. Project Manager
NRO/DNRL/NARP
(301) 415-3361

Hearing Identifier: AREVA_EPR_DC_RAIs
Email Number: 2753

Mail Envelope Properties (1F1CC1BBDC66B842A46CAC03D6B1CD4104283E4E)

Subject: DRAFT Response to U.S. EPR Design Certification Application RAI No. 442, FSAR Ch. 7, Question 7.1-30
Sent Date: 3/28/2011 3:32:42 PM
Received Date: 3/28/2011 3:32:47 PM
From: WELLS Russell (AREVA)

Created By: Russell.Wells@areva.com

Recipients:

"HUDSON Greg (AREVA)" <Greg.Hudson@areva.com>
Tracking Status: None
"BUDZIK Dennis (AREVA)" <Dennis.Budzik@areva.com>
Tracking Status: None
"BENNETT Kathy (AREVA)" <Kathy.Bennett@areva.com>
Tracking Status: None
"DELANO Karen (AREVA)" <Karen.Delano@areva.com>
Tracking Status: None
"HALLINGER Pat (EXTERNAL AREVA)" <Pat.Hallinger.ext@areva.com>
Tracking Status: None
"ROMINE Judy (AREVA)" <Judy.Romine@areva.com>
Tracking Status: None
"RYAN Tom (AREVA)" <Tom.Ryan@areva.com>
Tracking Status: None
"WILLIFORD Dennis (AREVA)" <Dennis.Williford@areva.com>
Tracking Status: None
"Tesfaye, Getachew" <Getachew.Tesfaye@nrc.gov>
Tracking Status: None

Post Office: AUSLYNCMX02.adom.ad.corp

| Files | Size | Date & Time | |
|---|-------------|------------------------|--------|
| MESSAGE | 18079 | 3/28/2011 3:32:47 PM | |
| RAI 442 Question 07.01-30 Reponse US EPR DC - DRAFT.pdf | | | 271588 |

Options

Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received:

**Request for Additional Information No. 442(4295, 5076, 5068, 5067), Revision 1,
Question 07.01-30**

9/10/2010

U. S. EPR Standard Design Certification

AREVA NP Inc.

Docket No. 52-020

SRP Section: 07.01 - Instrumentation and Controls - Introduction

SRP Section: 07.03 - Engineered Safety Features Systems

SRP Section: 07.09 - Data Communication Systems

Application Section: FSAR Ch 7

**QUESTIONS for Instrumentation, Controls and Electrical Engineering 1
(AP1000/EPR Projects) (ICE1)**

DRAFT

Question 07.01-30:

Provide details on how the U.S. EPR design will verify functionality of the self testing features based on guidance from BTP 7-17.

For the U.S. EPR design, the applicant has committed to meeting BTP 7-17, "Guidance on Self-Test and Surveillance Test Provisions." BTP 7-17 (which cites GDC 21 and 10 CFR 50.55a(h) as a regulatory bases) states that: "(a) Self-test functions should be verified during periodic functional tests, and (b) If automatic test features are credited with performing surveillance test functions, provisions should be made to confirm the execution of the automatic test during plant operation. The capability to periodically test and calibrate the automatic test equipment should also be provided. The balance of surveillance and test functions that are not performed by the automatic test feature should be performed manually to meet the intent of Regulatory Guide 1.118. In addition, the automatic test feature function should conform to the same requirements and considerations (e.g., test interval) as the manual function."

- a) The staff requests that the applicant provide details on the method by which the U.S. EPR Protection System self testing features will be periodically verified and how the operation will be confirmed during plant operation.
- b) How does the applicant propose to meet item (b), as quoted above?

Response to Question 07.01-30:

Item a:

Technical Report "U.S. EPR Protection System Surveillance Testing and TELEPERM XS Self-Monitoring" (ANP-10315, Revision 0) presents the U.S. EPR protection system (PS) self-test features.

Technical Report ANP-10315P, Revision 0, Section 3.6 addresses compliance with BTP 7-17 and Section 3.5 addresses compliance with RG 1.118.

Item b:

Technical Report ANP-10315P, Revision 0, Section 3.7 states that there are no automatic test features that use the automatic test equipment credited to perform surveillance testing in the U.S. EPR PS design.

Technical Report "U.S. EPR Protection System Surveillance Testing and TELEPERM XS Self-Monitoring" (ANP-10315P, Revision 0) will be provided by separate letter.

FSAR Impact:

The U.S. EPR FSAR will not be changed as a result of this question.