

US-APWRRAlSPeM Resource

From: Ciocco, Jeff
Sent: Monday, September 10, 2012 7:09 AM
To: us-apwr-rai@mhi.co.jp; US-APWRRAlSPeM Resource
Cc: Nold, David; McKirgan, John; Kallan, Paul; Snyder, Amy
Subject: US-APWR Design Certification Application RAI 959-6765 (9.4.1)
Attachments: US-APWR DC RAI 959 SPCV 6765.pdf

MHI,

The attachment contains the subject Request for Additional Information (RAI). This RAI was sent to you in draft form. Your licensing review schedule assumes technically correct and complete responses within 30 days of receipt of RAIs.

Please submit your RAI response to the NRC Document Control Desk.

Thank you,

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From: Ciocco, Jeff

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Options

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REQUEST FOR ADDITIONAL INFORMATION 959-6765

Issue Date: 9/10/2012

Application Title: US-APWR Design Certification - Docket Number 52-021

Operating Company: Mitsubishi Heavy Industries

Docket No. 52-021

Review Section: 09.04.01 - Control Room Area Ventilation System

Application Section: DCD Section 9.4.1

QUESTIONS

09.04.01-33

RAI follow-up to MHI Response to RAI No. 883-6063 Question No. 09.04.01-30

In your response to Question No. 09.04.01-30, the commitment was made to establish an initial reliability for each of the individual AAC GTGs by performing a series of start-and-run tests during the start-up phase of plant operation. The testing would be performed until 25 consecutive such tests were successful for each AAC GTG. This approach is fully acceptable to the staff.

However, the subject response goes on to say that after a sufficient number of successful starts via this process, future COLs will then be able to simply reference the accumulated data utilizing 'NSAC 108 methodology' and no further individual AAC GTG units will be tested to demonstrate their own individual reliability. This portion of your response is unacceptable to the staff.

During a June 6, 2012 conference call on this subject, the staff stated that all new AAC GTGs need to be put through this 25 start and run testing without a failure to demonstrate their individual reliability. The staff explained that NSAC 108 methodology only applied to power sources that have an operating history and that it therefore cannot be applied to new GTG units as they do not have a unit specific operating history.

The staff recognizes that RG 1.155 (1988) appears to allow the use of this methodology for all plants because the distinction between in-service power units and new power units is not made. The NSAC 108 study was performed in 1986 and the RG was developed in 1988 with an essentially total focus on the operating fleet, as there were no new reactor operating licenses on the near horizon.

The staff's position on this issue is that all new AAC power sources (across all 'active plant' design centers) must meet the start and run testing requirement to demonstrate an initial reliability for each and every new AAC power unit in accordance with the 25 consecutive starts program discussed above. Please provide an amended response that reflects this position.

REQUEST FOR ADDITIONAL INFORMATION 959-6765

