

February 11, 2013

Dr. J. Sam Armijo, Chairman
Advisory Committee on Reactor Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: CHAPTER 9 OF THE SAFETY EVALUATION REPORT WITH OPEN ITEMS FOR
THE UNITED STATES - ADVANCED PRESSURIZED WATER REACTOR
DESIGN CERTIFICATION APPLICATION

Dear Dr. Armijo:

Thank you for your letter dated December 20, 2012, which elaborates the reason for the continued Advisory Committee on Reactor Safeguards (ACRS) concern regarding the absence of an explicit technical specification (TS) limiting condition for operation (LCO) for the essential chilled water system (ECWS). The staff appreciates ACRS's concern for clarity of the required actions for operators.

In your earlier letter dated September 18, 2012, it was recommended that the staff reexamine the justification for the TS omission of the ECWS. The staff carefully evaluated the ACRS recommendation and concluded that an ECWS TS LCO is not required by the regulations. The results of this evaluation were included in the staff's response letter to the ACRS dated October 26, 2012. The staff also notes the following:

- (1) An ECWS TS LCO is not consistent with existing standard TS (NUREGs 1430 - 1434).
- (2) ECWS unavailability and inoperability is conservatively addressed by the TS definition of operability, in that the TS-supported system would be declared inoperable upon ECWS unavailability.

The staff continues to maintain its position that a TS LCO is not needed. However, since the staff also shares the goal of clarity for operations, a related request for additional information (RAI) was recently issued. This RAI requests that the applicant either consider enhancing the TS bases with respect to the support system function of the ECWS for each of the ECWS TS supported systems or suggest other means to enhance understanding of potential impact of ECWS unavailability on operability of supported systems.

J. S. Armijo

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The staff appreciates the ACRS's concern regarding the lack of an explicit ECWS LCO TS. The staff plans to discuss the resolution of this RAI with the ACRS during Phase 4 of the review.

Sincerely,

/RA by Mike Johnson for/

R. W. Borchardt
Executive Director
for Operations

cc: Chairman Macfarlane
Commissioner Svinicki
Commissioner Apostolakis
Commissioner Magwood
Commissioner Ostendorff
SECY

J. S. Armijo

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