ArevaEPRDCPEm Resource

From:	Miernicki, Michael
Sent:	Wednesday, November 06, 2013 9:05 AM
То:	'usepr@areva.com' (usepr@areva.com)
Cc:	Bongarra, James; Junge, Michael; Eudy, Michael; Segala, John; Gleaves, Bill;
	ArevaEPRDCPEm Resource
Subject:	US EPR DC DRAFT RAI 617, Chapter 18, Human Factors Engineering
Attachments:	Draft RAI 617_COLP_7265.docx

Attached please find Draft RAI No. 617 regarding your application for standard design certification of the U.S. EPR. If you have any questions or need clarification regarding this Draft RAI, please let me know as soon as possible, I will have our technical Staff available to discuss them with you.

Please also review the Draft RAI to ensure that we have not inadvertently included proprietary information. If there is any proprietary information, please let me know within the next ten days. If I do not hear from you within the next ten days, I will assume there are none and will make the Draft RAI publicly available.

Thank you,

Mike

Michael J. Miernicki Sr. Project Manager NRC/NRO/DNRL/LB1 301-415-2304 Hearing Identifier:AREVA_EPR_DC_RAIsEmail Number:4716

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From:	Miernicki, Michael
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Draft Request for Additional Information 617

Issue Date: 11/06/2013 Application Title: U. S. EPR Standard Design Certification - Docket Number 52-020 Operating Company: AREVA NP Inc. Docket No. 52-020 Review Section: 18 - Human Factors Engineering Application Section:

QUESTIONS

18-242

The staff notes that 10 CFR 52.47(b)(1) requires acceptance criteria be included in the FSAR. The staff has determined that FSAR Revision 5 does not clearly and consistently incorporate by reference Implementation Plans (IPs). Although FSAR Revision 5 cites IPs in the "References" portion of each section of FSAR Chapter 18, merely citing the IPs in the "References" does not provide sufficient commitments that AREVA will implement the IPs accordingly. Because IPs provide the basis for ITAAC acceptance criteria and ITAAC acceptance criteria are used to verify successful implementation of HFE design commitments, the FSAR should state that each IP is included by reference.

The staff requests for the applicant to clearly and consistently state in the FSAR that all Implementation Plans are incorporated by reference and will be implemented to accomplish the specific HFE design activity to which they apply. For example, one option acceptable to the staff is to include a statement in the beginning of FSAR Chapter 18 indicating that IPs for each of the HFE program elements with associated IPs will be followed to implement the element in accordance with the applicable ITAAC acceptance criteria. There are alternative options that AREVA might propose as well.