

## **Response to Audit Open Items for Reactor Pressure Vessel Internals DCD Section 3.9.5**

### **Open Item #1 (AI 3-35.7)**

The following pertains to document 11A60-ME-DS240-00-R02, DPL1, Rev. 2 “Design Specification for Reactor Vessel Core Support and Internal Structures.”

Appendix II – No information in the design spec for Level C and Level D events.

### **Response**

DCD Tier 2, Table 3.9-1 describes the events commonly applicable to all the major components. Since Level B events are conservatively included with Level C events, there are no Level C events in Table 3.9-1 of the APR1400 design. Appendix II of the referenced design specification includes only Normal Events (Level A Events) and Upset Events (Level B Events) because Level C and Level D events are not used to perform fatigue evaluations for the reactor internals.

However, 11A60-ME-DS240-00-R02 Appendix III provides the Design Basis Pipe Break loads used to evaluate Level C service loadings and the SSE and LOCA loads used to evaluate Level D service loadings.

#### **Impact on DCD**

There is no impact on the DCD.

#### **Impact on PRA**

There is no impact on the PRA.

#### **Impact on Technical Specifications**

There is no impact on the Technical Specification.

#### **Impact on Technical/Topical/Environmental Reports**

There is no impact on any Technical, Topical or Environmental Reports.

## **Response to Audit Open Items for Reactor Pressure Vessel Internals DCD Section 3.9.5**

### **Open Item #2 (AI 3-35.8)**

ASME Code Section NCA-3252 has three provisions for the contents of design specification. Provision a) and c) apply. Provision a) has 8 categories, which the design spec includes. However, provision c), which deals with pre-service examination, is not mentioned in the design spec.

### **Response**

The APR1400 Reactor Vessel Internals design specification does not define the applicable components and parts to be examined for pre-service inspection (PSI) and in-service inspection (ISI) in accordance with Section XI because the pre-service inspection is to be performed at the plant site, (not at the vendor's facility), by the COL applicant who has the responsibility to prepare and implement the PSI and ISI programs.

Therefore, the design specification only has the requirement that core support and internal structure components be designed with the capability of meeting the inspection requirements of ASME Section XI in Section 6.2.5.

#### **Impact on DCD**

There is no impact on the DCD.

#### **Impact on PRA**

There is no impact on the PRA.

#### **Impact on Technical Specifications**

There is no impact on the Technical Specification.

#### **Impact on Technical/Topical/Environmental Reports**

There is no impact on any Technical, Topical or Environmental Reports.