

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

APR1400 Design Certification

Korea Electric Power Corporation / Korea Hydro & Nuclear Power Co., LTD

Docket No. 52-046

RAI No.: 138-8067
SRP Section: 16.3.0 - LCO and SR Applicability
Application Section: LCO 3.0.8
Date of RAI Issue: 08/07/2015

Question No. 16-33

Paragraph (a)(11) of 10 CFR 52.47 and paragraph (a)(30) of 10 CFR 52.79 states that a design certification (DC) applicant and a combined license (COL) applicant, respectively, are to propose technical specifications (TS) prepared in accordance with 10 CFR 50.36 and 50.36a. 10 CFR 50.36 sets forth requirements for TS to be included as part of the operating license for a nuclear power facility.

NUREG-1432, "Standard Technical Specifications-Combustion Engineering Plants," Rev. 4, provides NRC guidance on format and content of technical specifications as one acceptable means to meet 10 CFR 50.36 requirements.

SRP Section 16.0, Part III.2.A states, in part, "when reviewing a difference between the proposed TS provision and the reference TS provision, verify that the applicant's written technical or administrative reasoning in support of the difference is logical, complete, and clearly written."

Staff needs to evaluate all technical differences from standard TS (STS) NUREG-1432, STS Combustion Engineering Plants, Rev. 4, which is referenced by the DC applicant in DCD Tier 2 Section 16.1, and the docketed rationale for each difference because conformance to STS provisions is used in the safety review as the initial point of guidance for evaluating the adequacy of the generic TS to ensure adequate protection of public health and safety, and the completeness and accuracy of the generic TS Bases.

STS LCO 3.0.8 stipulates actions when one or more snubbers are unable to perform their intended support function. LCO 3.0.8 was developed as a risk-informed technical specification improvement and was designated TSTF-372. TSTF-372 included in its justification a generic risk evaluation applicable to operating plants. The applicant is requested to justify including TSTF-372 and LCO 3.0.8 in the proposed generic TS; the

technical basis for the justification needs to include the APR1400 design and an applicable generic risk evaluation.

This information is needed to ensure APR1400 DCD provides an adequate basis for including LCO 3.0.8, consistent with TSTF-372.

Response

The APR1400 specific design information and generic risk assessment and management activities for snubbers will be provided to justify the applicability of LCO 3.0.8 and TSTF-372. KHNP will submit the related information in the third quarter of 2016 after the PSA update plan to support DCD Chapter 19 is completed; currently scheduled for August 2016.

Impact on DCD

There is no impact on 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 Report

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