

Enclosure 1

MFN 16-017

GEH Response to RAI Question 1.0

Question 1.0

General Electric Hitachi Nuclear Energy QAPD, draft changes to Revision 12, Part III, "Supplemental Details," Section 4.4, "Graded Approach to Quality," provides a brief description and the safety classification basis.

Provide additional details to clarify which systems, structures, and components (SSCs) would be subject to the graded approach to quality. Explain what specific criteria will be used to identify which SSCs can use graded quality assurance, and explain how that meets the requirements of Title 10 of the Code of Federal Regulations Part 50, Appendix B.

GEH Response

Provide additional details to clarify which systems, structures, and components (SSCs) would be subject to the graded approach to quality.

GEH applies the graded approach to quality for all items that do not meet the definition of a basic component as defined by 10 CFR Part 21.

Explain what specific criteria will be used to identify which SSCs can use graded quality assurance, and explain how that meets the requirements of Title 10 of the Code of Federal Regulations Part 50, Appendix B.

A graded approach to quality only applies to non-basic components. For example, it applies to SSCs with a Safety-Related Classification of "S" (Special) in Tier 2 Table 3.2-1 of the ESBWR Design Control Document, Revision 10, dated April 2014 (i.e., the "ESBWR DCD"), as certified by the US NRC effective 11/14/2014. The ESBWR DCD elevates many SSCs that would have been classified as "Non-Safety Related" under 10 CFR 50, Appendix B in order to apply more rigorous quality requirements (see Note 5 of Tier 2 Table 3.2-1 of the ESBWR DCD).

In addition, GEH may apply the classification of Special to products and services provided to international nuclear power plants not covered by 10 CFR 50 Appendix B or 10 CFR Part 21 to ensure that applicable international regulations, codes, and standards are met.

GEH's use of a graded approach to quality meets the requirements of Title 10 of the Code of Federal Regulations Part 50, Appendix B in that GEH applies all applicable 10 CFR 50 Appendix B requirements, as described and endorsed by ASME NQA-1, to all basic components as defined by 10 CFR Part 21.

Effect on QAPD Topical Report

This RAI response has no effect on the QAPD Topical Report.