

ENCLOSURE 5

APP-GW-GLY-100 Revision 0

Discuss Design Certification Renewal for **AP1000**[®] (Closed – Non-Proprietary)

This is the Non-Proprietary version of the document.



Discuss Design Certification Renewal for **AP1000[®]** (Closed)



Objective and Agenda

Objective:

- Interactive meeting to confirm Westinghouse's understanding of regulations and draft guidance related to **AP1000** design certification renewal

Agenda:

- Background Information
- Modifications vs. Amendments
- Renewal Backfits



AP1000 Design Certification Renewal

- Westinghouse is performing a compressive evaluation of **AP1000** renewal options. The evaluation includes:
 - Regulatory Compliance Assessment
 - Risk Assessment
 - Market Assessment
 - Cost & Schedule Estimate
- **AP1000** renewal plans are not finalized
- Discussion is needed to ensure Westinghouse understands NRC regulations and draft staff positions so the renewal scope can be clearly defined
- Information gathered from this meeting will be used as an input into the renewal evaluation



Background Information

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“Up to Date” vs “Entire DCD Updated”

10 CFR 52.57(a):

An application for renewal must contain all information necessary to bring up to date the information and data contained in the previous application.

Draft Staff Position: *(Ref: 12/01/10 DRAFT NRC Guidelines for ABWR)*

The entire DCD...must be updated under 10 CFR 52.57(a) to include corrections of errors, typos, and defects...which are known by the DC Renewal applicant. The DCD must also reflect any design changes



“Entire DCD Updated” per Draft Guidance

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AP1000 Renewal Based on Draft Guidance

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Modifications or Amendments?



Modifications vs. Amendments

Draft Staff Position on Modifications: *(Ref: 12/01/10 DRAFT NRC Guidelines for ABWR)*

Those changes that are necessitated by the requirement to update the application in accordance with § 52.57(a) [e.g., to correct known errors, typos, and defects (as defined in Part 21)] and § 52.59(a).

Draft Staff Position on Amendments: *(Ref: 6/22/15 NRC Renewal Slides)*

Those changes proposed by the DC Renewal applicant in accordance with § 52.59(c)... These changes are not required to address the criteria of § 52.63.



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Modifications vs. Amendments

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Modification vs. Amendment Example 1

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Modification vs. Amendment Example 2

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Modification vs. Amendment Example 3

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Modification vs. Amendment Example 4

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Modification vs. Amendment Example 5

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Modification vs. Amendment Example 6

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Modification vs. Amendment Example 7

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Modification vs. Amendment Example 8

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Modification vs. Amendment Example 9

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Modification vs. Amendment Example 10

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Modification vs. Amendment Example 11

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Modification vs. Amendment Example 12

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Additional Updates: Probabilistic Risk Assessment

Draft Staff Position: *(Ref: 12/01/10 ABWR Draft Guidelines)*

Application should include “revised design-specific probabilistic risk assessment and its results to reflect changes...”



Additional Updates: Topical Reports & Technical Reports

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Draft Staff Position: *(Ref: 12/01/10 ABWR Draft Guidelines)*

“The staff intends to review the DC renewal application...to ensure that it includes updates to all topical reports”

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Draft Staff Position: *(Ref: 12/01/10 ABWR Draft Guidelines)*

“NRC staff intends to ensure that...[the application] has been revised...at the level of detail required by 10 CFR 52.47, analyses, evaluations, and reports that have either been updated...”

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Additional Updates: Aircraft Impact Assessment

10 CFR 52.57(a):

“...the Commission shall...find that the renewed design complies with the applicable requirements of 10 CFR 50.150”

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Amendments

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Renewal Backfits



Renewal Backfits

Draft Staff Position on Renewal Backfits: *(Ref: 12/01/10 DRAFT NRC Guidelines for ABWR)*

Those changes that are necessary to comply with additional requirements imposed by the NRC through application of the criteria in § 52.59(b). The NRC staff is responsible for justifying renewal backfits under this provision. However, to gain insight as to whether a change needs to be made under this criterion, additional information may be requested from the applicant pursuant to the updating requirement in § 52.57(a).

Draft Staff Position: *(Ref: 12/01/10 DRAFT NRC Guidelines for ABWR)*

The staff will review additional information that is provided by the applicant to determine whether any other NRC requirements should be imposed on the certified design based on application of the renewal criteria in § 52.59(b).

These criteria include: adequate protection, compliance with the regulations in effect at the time of the original certification, and cost-justified substantial increase in overall protection of the public health and safety or common defense and security.



Additional Application Information

- NRC reinforced that “additional application information” will be needed pursuant to 52.57(a) to ensure the application is brought “up to date”:
 - Any new or relevant information regarding design certification renewal applicant
 - Any material new information related to unresolved safety issues (USIs), generic safety issues (GSIs) addressed in original certification
 - Any new USIs, GSIs
 - New generic letters and bulletins
 - Relevant domestic and international operating experience
- Westinghouse believes this information will be used by staff to ensure application is brought fully “up to date” and will help determine other backfits imposed under 52.59(b)
 - From “Backfits” definition in ABWR guidance: “...to gain insight as to whether a change needs to be made under this criterion, additional information [may be] requested from the applicant pursuant to the updating requirement in 52.57(a).”
- During NEI public meeting, it was stated that the NRC expects backfits imposed per 52.59(b) to be limited for the **AP1000** renewal and will be based on rules in 10 CFR 50.109



Westinghouse needs to understand the format and level of detail required for the “additional application information” and how 50.109 will be implemented

Backfit Discussion 1

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Backfit Discussion 2

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Backfit Discussion 3

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Backfit Discussion 3, Cont.

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Backfit Discussion 4

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Summary



Summary

- **AP1000** renewal plans are not finalized
- Westinghouse must understand NRC regulations and draft staff positions so the renewal scope can be clearly defined
- It is important for Westinghouse to understand what change types are mandatory vs. discretionary (i.e. Modification vs. Amendment)
- It is important for Westinghouse to understand what Backfits may be imposed



**Discussion:
Next steps**

Questions/Discussion

