



# HITACHI

## GE Hitachi Nuclear Energy

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**Subject: Item No. 24 on NRC List of Design Changes for Consideration in Advanced Boiling Water Reactor Design Certification Renewal**

### References:

1. Letter from USNRC to Jerald G. Head, GEH, Subject: GE-Hitachi Nuclear Energy – United States Advanced Boiling-Water Reactor Design Certification Renewal Application, July 20, 2012 (NRC ADAMS Accession Number ML12125A385).
2. Letter from Jerald G. Head, GEH, to USNRC, Subject: NRC Review of GE Hitachi Nuclear Energy – United States Advanced Boiling-Water Reactor (ABWR) Design Certification Renewal Application – Submittal Date for ABWR DCD Revision 6, March 17, 2014 (Public Version: ML14078A070).

In a letter dated July 20, 2012 (Reference 1), the Nuclear Regulatory Commission (NRC) provided a compilation of design changes that the NRC requested GE Hitachi (GEH) consider in the renewal of the Advanced Boiling Water Reactor (ABWR) design certification. The purpose of this letter is to provide the results of the GEH review of Item 24 of the list provided in the enclosure to the July 20, 2012, NRC letter.

Specifically, Item 24 requested that GEH consider applying the guidance from Regulatory Issue Summary 2008-05, Revision 1 (ML102500244), to the existing ABWR Tier 1 inspections, tests, analyses, and acceptance criteria (ITAAC), and consider submitting revised ITAAC.

By way of background, the NRC first issued RIS 2008-05 (ML073190162) to address good practices for preparing ITAAC. RIS 2008-05, Revision 1 (ML102500244), expands on the original RIS. It also indicates that additional information appears in Regulatory Guide (RG) 1.215, "Guidance for ITAAC Closure under 10 CFR Part 52" (ML091480076), which endorses the methodologies described in the industry guidance document Nuclear Energy Institute (NEI) 08-01, "Industry Guideline for the ITAAC Closure Process under 10 CFR Part 52," Revision 3, issued January 2009 (ML090270415), and which has been revised subsequently (e.g., see Revision 5 – Corrected, June 2014, ML14182A160). More recently, the NRC staff has initiated

an action with a goal to develop a set of standardized ITAAC that will be incorporated into regulatory guidance (see NRC Public Meeting Summary, February 6, 2015, ML15036A211). Finally, specific to the ABWR, the NRC has issued an "ABWR Targeted ITAAC" listing (ML093070156), which is described in NRC Inspection Manual, Manual Chapter 2506, "Construction Reactor Oversight Process General Guidance and Basis Document" (March 16, 2015, ML15055A477).

The ABWR DCD Section 14.3 describes the process for developing ITAAC in Tier 1. The NRC ABWR Final Safety Evaluation Report (NUREG-1503), Section 14.3, explains how the NRC reviewed Tier 1 and Section 14.3 through a very thorough process in accordance with the requirements in 10 CFR Part 52 and the guidance provided in Commission Staff Requirements Memoranda (SRMs) related to design certification applications. The NRC staff concluded that the ITAAC are acceptable. Subsequent NRC guidance related to ITAAC does not change the NRC conclusions.

Currently, NRC staff guidance for reviewing ITAAC is provided in NUREG-0800, Standard Review Plan, Section 14.3. The initial draft of this guidance (SRP 14.3, Draft Rev. 0, April 1996, ML052070653) references the various Commission documents that provided guidance for the review of ITAAC in initial design certifications. As explained above, NRC and industry efforts regarding development, review, and inspection of ITAAC continue.

In a letter dated March 17, 2014 (Reference 2), GEH provided a high-level description of the proposed closure of Item 24, indicating that changes to Tier 1 would be minimized. For the renewal application, GEH has submitted new or revised ITAAC for the ABWR Design Control Document (DCD) Tier 1 in response to certain NRC Requests for Additional Information (RAI). These new or revised ITAAC are listed in Enclosure 1. GEH has considered NRC guidance regarding ITAAC in the development of these new or revised ITAAC and continues to follow this practice for ITAAC development. In this manner, GEH has addressed Item 24 and no further action is required.

If you have any questions concerning this letter, please contact Hugh Upton at 408-314-8499.

Sincerely,



Jerald G. Head  
Senior Vice President, Regulatory Affairs

Commitments: No additional commitments are made in this response.

Enclosure:

1. Table of New or Revised ITAAC in ABWR Design Certification Renewal Application

cc: Adrian Muniz, NRC  
DBR-0019671