

## **KHNPDCDRAIsPEm Resource**

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**From:** Ward, William  
**Sent:** Monday, August 08, 2016 2:57 PM  
**To:** apr1400rai@khnp.co.kr; KHNPDCDRAIsPEm Resource; daegeun.ahn@gmail.com; Andy Jiyong Oh; Jungho Kim (jhokim082@gmail.com); Mannon, Steven (steven.mannon@aecom.com)  
**Cc:** Williams, Donna; Ciocco, Jeff; Roy, Tarun; Talbot, Frank; Kavanagh, Kerri  
**Subject:** APR1400 Design Certification Application RAI 513-8663 [14.2 - Initial Plant Test Program - Design Certification and New License Applicants]  
**Attachments:** APR1400 DC RAI 513 QVIB 8663.pdf

KHNP,

The attachment contains the subject request for additional information (RAI). This RAI was sent to you in draft form. Your licensing review schedule assumes technically correct and complete responses within 30 days of receipt of RAIs. However, KHNP requests, and we grant, 90 days to respond to this RAI. We may adjust the schedule accordingly.

Please submit your RAI response to the NRC Document Control Desk.

Thank you,

**William R. Ward, P.E.**  
**Senior Project Manager**  
**U.S. Nuclear Regulatory Commission**  
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**Washington, DC, 20555-0001**  
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**Subject:** APR1400 Design Certification Application RAI 513-8663 [14.2 - Initial Plant Test Program - Design Certification and New License Applicants]  
**Sent Date:** 8/8/2016 2:57:29 PM  
**Received Date:** 8/8/2016 2:57:33 PM  
**From:** Ward, William

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**Options**

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**Return Notification:** No  
**Reply Requested:** No  
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# REQUEST FOR ADDITIONAL INFORMATION 513-8663

Issue Date: 08/08/2016

Application Title: APR1400 Design Certification Review – 52-046

Operating Company: Korea Hydro & Nuclear Power Co. Ltd.

Docket No. 52-046

Review Section: 14.02 - Initial Plant Test Program - Design Certification and New License Applicants

Application Section: APR1400 DCD Section 14.2

## QUESTIONS

### 14.02-67

In NRC Question 14.02-8 in RAI 91-7867, the NRC staff determined that the DC applicant did not meet the guidance of RG 1.68, Revision 4, Sections A, B, and C and NUREG-0800, SRP section 14.2. Specifically, the NRC staff concluded that the DC applicant should reference an ITP administrative control document or Startup Administration Manual (SAM) in APR1400 DCD 14.2.3 and place this document on the docket which covers the DC applicant's responsibilities for ITP administrative controls that govern the development and conduct of the APR1400 Design Certification ITP. The COL applicant will then complete the ITP administrative manual or Startup Administrative Manual (SAM) for the COL applicant's portion of responsibilities for conducting and implementing the APR1400 ITP. This question is part of Open Item 14.2.13-1.

On December 9, 2015 and June 30, 2016, the DC applicant responded to Question 14.02-8 in RAI 7867 with the following information:

The objectives of the ITP in the DC application are to provide an adequate test plan for the development and safe execution of the ITPs by the COL applicant(s). [\(Initial copy attached\)](#). The COL applicant's portion of responsibilities for conducting and implementing the APR1400 ITP is detailed in COL item 14.2(3). [The SAM is to be prepared to implement the detailed individual procedures. Preparation of the SAM is detailed as COL 14.2\(3\).](#)

As a reference, the general content requirements of the SAM, (as stated in the COL Item), are listed below [\(see Attachment for draft SAM\)](#):

1. Purpose
2. Responsibilities
  - Commissioning Director
  - Commissioning Control Team General Manager
  - Quality Assurance Team General Manager
  - Commissioning Team General Manager
3. Procedure
  - Manual Format
  - Procedure Format
  - Preparation, Review, and Approval
  - Revision
  - Distribution and Control
4. Attachment (Each document format is to be provided)

## REQUEST FOR ADDITIONAL INFORMATION 513-8663

The NRC staff determined that this KHNP response is not acceptable.

NUREG-0800, SRP Section 14.2, Page 4, states the following:

### 3. Initial Test Program Administrative Procedures

#### DC Applicant

The applicant should provide a summary description of the following areas in the SAM:

- A. The applicant should provide general guidance to control ITP activities, including administrative controls that will be used to develop, review, and approve individual test procedures, coordination with organizations involved in the test program, participation of plant operating and technical staff, and review, evaluation, and approval of test results.
- B. The applicant should include general guidance for the review of relevant operating and testing experiences at other facilities. This guidance should recognize reportable occurrences of repeatedly experienced safety concerns and other operating experiences that could potentially impact the performance of the test program.
- C. The applicant should include general guidance about how, and to what extent, the test program will use and/or test plant operating, emergency, and surveillance procedures.
- D. The applicant should provide test abstracts of SSCs and unique design features that will be tested to verify that system and component performance is in accordance with the design. These test abstracts should include the objectives, tests, and acceptance criteria that will be included in the test procedures.

Based on this guidance in SRP 14.2, the DC applicant should provide more information in the SAM to cover Items A through D above including administrative controls for the list test abstracts in DCD Section 14.2. The list of test abstracts in DCD Section 14.2 should also be included in the SAM.