



KHNP

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Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Attention: Mr. Jeff Ciocco
Division of New Reactor Licensing

Docket No. 52-046
MKD/NW-17-0024L

Subject: Transmitted Standard ITAAC and Evaluation of Its Application to APR1400

Reference: NRC Letter (ADAMS Accession No.: ML16208A536) Transmittal of Standard Inspections, Tests, Analysis and Acceptance Criteria, dated August 3, 2016

KHNP appreciates the transmittal of the NRC's set of standard inspections, tests, analysis and acceptance criteria (ITAAC) that was sent to us on August 3, 2016 for our consideration to use in the design certification of the APR1400. We have taken this time to review the 144 standard ITAAC against the 1063 ITAAC that have been developed as part of APR1400 DCA. After careful evaluation, we have determined that it would be in the best interest for the APR1400 project to remain with the developed ITAAC contained in our DCD Tier 1 and those developed in response to the various RAIs. During the public meeting that was held on December 1, 2016, it was evident that the staff had put in a considerable amount effort in reviewing the selection and content of the existing ITAAC and had considered the standard ITAAC in their review efforts.

As was stated in the August 3 transmittal and confirmed in the meeting, the NRC's standard ITAAC is not to be considered inclusive. In gaining an understanding of the extent of the systems and components that are not included, it is our conclusion that the selection of items, alignment on the critical aspects and agreement on the specific wording would most likely extend beyond the current certification schedule. The subsequent re-review by the technical staff would require additional time in the schedule and would not significantly enhance the safety determinations.

Given the potential schedule impact of adopting the standard ITAAC KHNP has opted to stay with the original ITAAC in Tier 1 as reviewed by the NRC and revised or developed through the RAI process. The adaptation of the standard ITAAC may be reconsidered in the future as a part of the COLA process.

KHNP realizes that there can be benefits in adopting the NRC's standard ITAAC; potentially reducing the overall number of ITAAC and gaining needed clarity to help in the closure on the back end of the process. Our decision to maintain the current ITAAC should in no way be interpreted as a lack of support for the industry effort to standardize ITAAC. KHNP will continue to participate in the industry efforts to standardize and provide the lessons learned from our efforts to enhance the process.

Should you want to discuss our consideration of the transmitted standard ITAAC and its application to the APR1400 project, please feel free to contact Daegeun Ahn, Director of KHNP



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Sincerely,

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