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US Nuclear Regulatory Commission
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Subject: Revised Response, GEH Proposed Resolution of Item # 17 of NRC Suggested U.S. Advanced Boiling Water Reactor Design Changes

GEH submitted a Design Certification Renewal application for the U.S. Advanced Boiling Water Reactor (ABWR) in Reference 1 pursuant to the requirements of Subpart B, "Standard Design Certifications," of Title 10 of the Code of Federal Regulations (10 CFR) Part 52, "Licenses, Certifications, and Approvals for Nuclear Power Plants."

In Reference 2, the NRC suggested design changes to address issues that the agency considered to be regulatory improvements or changes that could meet the 10 CFR 52.59(b) criteria. In addition, in Reference 3, the NRC requested that GEH implement the Fukushima Near-Term Task Force recommendations contained in SECY-12-0025, "Proposed Orders and Requests for Information in Response to Lessons Learned from Japan's March 11, 2011, Great Tohoku Earthquake and Tsunami," dated February 17, 2012. Collectively, these items are termed the "28-item backfit list."

Item #17 of the list relates to updating emergency procedure guidelines and severe accident management guidelines consistent with NEI 91-04. GEH originally addressed Item #17 in Reference 4. This letter provides a revised response based on identifying information that is impacted by another action related to revising the ABWR Design Control Document (DCD).

Specifically, as explained in Reference 5, GEH removed references to Recommendation 4.2 mitigation strategies, the use of the term FLEX, and the references to industry guidance for implementing FLEX. Recent NRC actions involving a pending final rulemaking for 10 CFR 50.155, "Mitigation of Beyond-Design Basis Events," were discussed during a public teleconference held December 1, 2016. Under the latest public information regarding the pending final rule, there will be no requirements applicable to applicants for a standard design certification (or a renewal, as in the case of the ABWR application). It is expected that the final rule will be effective before the ABWR design certification renewal would be completed. The revised response for Item #17 removes references to FLEX support guidelines (NEI 12-06), and these

changes do not impact the DCD changes to address emergency procedure guidelines and severe accident management guidelines consistent with NEI 91-04.

Enclosure 1 of this letter provides the updated GEH response for Item #17, for ensuring consistency with the actions described in Reference 5. The DCD changes associated with Item #17 changes are described in DCD markups in Enclosure 2.

If you have any questions regarding this information, please contact me or Patricia Campbell (202-637-4239).

Sincerely,



Jerald G. Head
Senior Vice President, Regulatory Affairs

Commitments: No additional commitments are made in this response.

References:

1. Letter from R.E. Kingston, GEH to USNRC, Subject: ABWR Standard Plant Design Certification Renewal Application Design Control Document, Revision 5, Tier 1 and Tier 2, December 7, 2010.
2. 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.
3. Letter from Jerald G. Head, GEH, to USNRC, Subject: Response to NRC Letter: GE Hitachi Nuclear Energy – United States Advanced Boiling-Water Reactor Design Certification Renewal Application (July 20, 2012), September 17, 2012.
4. Letter from Jerald G. Head, GEH, to USNRC, Subject: GEH Proposed Resolution of Item # 17 of NRC Suggested U.S. Advanced Boiling Water Reactor Design Changes, June 19, 2015.
5. Letter from Jerald G. Head, GEH, to USNRC, Subject: Supplemental Information for GEH's Response to Item # 26 - Fukushima Recommendation 4.2 Mitigation Strategies of NRC Suggested U.S. Advanced Boiling Water Reactor Design Changes, January 23, 2017.

Enclosures:

1. Revised Response, GEH Proposed Resolution of Item #17
2. Revised Response, GEH Proposed Resolution of Item #17, ABWR DCD Revision 6 Markups

cc: A. Muniz, NRC
DBR-0010927R1