In its response to RAI 3-7829, Question 2.5.3-1, dated May 12, 2015 (ADAMS Accession No. ML15132A594), the applicant provided the following additional information:

- The APR1400 is not designed to accommodate nontectonic deformation beneath the foundations of seismic Category I and adjacent seismic Category II structures.

- The COL applicant should evaluate the potential future surface deformation of tectonic and nontectonic origin at the site as part of ~~COL 2.5(9)~~. COL 2.5(8)

- If the potential for surface deformation is present, the COL applicant will demonstrate that this deformation is within the design limits of the APR1400 plant as part of ~~COL 2.5(10)~~. COL 2.5(9)

The applicant also proposed modifications to DCD Tier 2, Table 2.0-1, Section 2.5.3, and Section 2.5.6 to incorporate the RAI response into the DCD. Because the RAI response and proposed modification address the potential for both tectonic and nontectonic surface deformation at the plant site, the staff finds the RAI response acceptable. The staff confirmed that DCD Revision 1, dated March 10, 2017, was revised as committed in the RAI response. Accordingly, the staff considers RAI 3-7829, Question 2.5.3-1, closed.

The staff determined that the DCD applicant clearly specified that there should be no potential for surface tectonic or nontectonic deformation at the site. The applicant also adequately described the site-specific geologic and seismic information and investigations necessary for a COL applicant to determine the potential for surface deformation and to ensure that there is no surface deformation at the site that could have an adverse impact on the structural integrity of safety-related SSCs. Accordingly, the staff concludes that the applicant adequately used no potential for surface deformation at the site as the design basis and that it provided the requirements that a COL applicant referring to the APR1400 DCD must meet to ensure that there is no surface deformation at the site. Because the “no surface deformation design basis” will ensure that the structural integrity of safety-related SSCs meets the relevant requirements of GDC 2 in Appendix A to 10 CFR Part 50 and of 10 CFR 100.23 and because the potential for surface deformation is not present at many sites in the United States, the staff determined that this basis for design is reasonable and, therefore, concludes that APR1400 DCD Section 2.5.3 is acceptable.

2.5.4.4 Stability of Subsurface Materials and Foundations, DCD Section 2.5.4

The staff reviewed the regulatory guidance and the APR1400 standard design site parameters and description in DCD Tier 2, Section 2.5.4, of the site-specific geotechnical and geophysical information and investigations that COL applicants must provide to determine the properties and stability of soil and rock under both static and dynamic loading conditions. The staff reviewed this information to ensure that the APR1400 DCD met the requirements of GDC 1, GDC 2, and GDC 44 in Appendix A to 10 CFR Part 50; Appendix S to 10 CFR Part 50; and 10 CFR Part 100. The staff focused its review on the APR1400 DCD standard design site parameters, in particular the information provided in DCD Tier 2, Table 2.0-1. During the review, the staff issued several RAIs addressing specific technical issues related to the APR14000 DCD application. The staff’s evaluation of the applicant’s responses to these RAIs is discussed below. The staff also prepared a number of editorial RAIs and clarification RAIs that it did not discuss in this technical evaluation.

In RAI 1-7827, Question 2.5.4-1, the staff asked the applicant to provide or properly cross-reference the soil or rock uniformity requirements needed for the foundation of safety-related structures. In its response to RAI 1-7827, Question 2.5.4-1, dated May 12, 2015 (ADAMS Accession No. ML15132A592), the applicant stated that there is no requirement for soil uniformity except that the dip angle in the soil layer shall be less than 20 degrees. The applicant proposed revisions to DCD Table 2.0-1, and DCD Tier 1, Table 2.1-1, with this information. Based on its review, the staff concludes that the applicant's response to RAI 1-7827, Question 2.5.4-1, properly described the soil or rock uniformity requirements needed to characterize the properties of underlying materials and is, therefore, acceptable. The staff confirmed that DCD Revision 1, dated March 10, 2017, was revised as committed in the RAI response. Accordingly, the staff considers RAI 1-7827, Question 2.5.4-1, closed.

In RAI 8-7847, Question 2.5.4-3, and RAI 149-8147, Question 2.5.4-12, the staff asked the applicant to provide the basis and applicability of the minimum soil angle of internal friction and to include associated information on the DCD. In its response to RAI 8-7847, Question 2.5.4-3, dated June 15, 2015 (ADAMS Accession No. ML15166A292), and RAI 149-8147, Question 2.5.4-12, dated September 17, 2015 (ADAMS Accession No. ML15260B316), the applicant stated that the basis for the selection of 35 degrees as the angle of friction comes from the Uniform Building Code (1997) and Hunt (1984). The applicant stated that the shear wave velocity of soil in the generic soil profiles for the APR1400 is a minimum of 304.8 m/s (1,000 ft/s). The applicant indicated that, based on the site categorization (Uniform Building Code 1997), the soil for a shear wave velocity of 600 to 1,200 ft/s is considered a stiff soil, which is medium dense to dense soil, and that the Geotechnical Engineering Investigation Manual (Hunt 1984) suggests that the medium dense to dense soil has the internal friction angle between 32 and 40 degrees. The applicant stated that the minimum soil angle of internal friction is applied below the footprint of the seismic Category I structures at its excavation depth. As a result of these questions the applicant included ~~COL 2.5(15)~~, tasking the COL applicant to confirm that the soil angle of internal friction below the footprint of the seismic Category I structures at their excavation depth is a minimum of 35 degrees. COL 2.5(10)

Based on its review of the applicant's response and associated references, the staff concludes that the applicant provided a comprehensive response for the basis and applicability for the selection of 35 degrees as the minimum soil angle of internal friction. Based on the review, the staff concludes that the applicant's response properly describes the requirements needed to characterize the properties of underlying materials (in this case the basis and applicability of the minimum soil angle of friction) and, therefore, is acceptable. The staff verified the incorporation of related information on the markups and considers RAI 8-7847, Question 2.5.4-3, and RAI 149-8147, Question 2.5.4-12, resolved. The staff confirmed that DCD Revision 1, dated March 10, 2017, was revised as committed in the RAI response. Accordingly, the staff considers RAI 8-7847, Question 2.5.4-3 and RAI 149-8147, Question 2.5.4-12, closed.

In RAI 8-7847, Question 2.5.4-4, the staff asked the applicant to provide the basis and applicability of the structural fill granular (SFG) parameters, including backfill density, Poisson's ratio, minimum dynamic shear modulus, minimum damping ratio, and strain-compatible minimum shear wave velocity. In its response to RAI 8-7847, Question 2.5.4-4, dated June 15, 2015 (ADAMS Accession No. ML15166A292), the applicant provided the basis and applicability for each of the aforementioned SFG parameters. For the backfill density, the applicant stated that the SFG backfill is a well-graded, dense gravelly soil and that, based on the Geotechnical Engineering Investigation Manual (Hunt 1984), it selected the design density value as 137 pcf (2.21 g/cm^3). For the Poisson's ratio, the applicant selected 0.33 based on the

report entitled, “Foundation of Machines” (Prakash and Puri 1988), which provides a range of dynamic Poisson’s ratios for soils of 0.3 to 0.35. The staff noted that the applicant selected, as the representative value of the dynamic Poisson’s ratio for backfill material, an average value of the specified range. For the dynamic shear modulus, the applicant referenced the report entitled, “Soil Moduli and Damping Factors for Dynamic Response Analysis” (Seed and Idriss 1970), in which a relationship between the dynamic shear modulus and the confining pressure is suggested as follows: $G = 1{,}000*K_2*(\sigma_m)^{1/2}$ at low strains of the order of $1x10^{-4}$ percent in psf units and $G = 22.1*K_2*(\sigma_m)^{1/2}$ kilograms per square centimeter (kg/cm^2), where σ_m is the average confining pressure of soil, and K_2 is the coefficient, which ranges from 80 to 180 for gravelly soil. The applicant selected 90 as a representative value for K_2, and the dynamic shear modulus becomes $G = 2{,}000*(\sigma_m)^{1/2}$ kg/cm^2. The applicant applied the average damping ratio to the APR1400, as suggested by Seed and Idriss (1976) in “Moduli and Damping Factor for Dynamic Analyses of Cohesionless Soils.” The applicant obtained the strain-compatible minimum shear wave velocity of 510 fps for backfill from the computed low-strain shear wave velocity and the backfill degradation curve (G/G_{max}), as presented in Table 2.0-1, and by using the averaged horizontal shear strains in the generic site profiles S1 - S9. The applicant stated that all parameters discussed above are applicable to backfill on the sides and in between seismic Category I structures.

The staff reviewed the applicant’s response to RAI 8-7847, Question 2.5.4-4, and acknowledged that the applicant used state-of-the-practice methods and the proper basis for the selection of the SFG parameters. Based on its review, the staff concludes that the applicant’s response properly described the requirements needed to characterize the properties of underlying materials (in this case the basis and applicability of the SFG parameters) and, therefore, is acceptable. Consequently, the staff considers RAI 8-7847, Question 2.5.4-4, resolved and closed.

In RAI 8-7847, Question 2.5.4-5, the staff asked the applicant to provide or cross-reference details on the properties of the lean concrete backfill in DCD Section 2.5.4.5. In its response to RAI 8-7847, Question 2.5.4-5, dated June 15, 2015 (ADAMS Accession No. ML15166A292), the applicant indicated that under the NI common basemat of the APR1400 standard plant, a layer of approximately 0.91-meter-thick (3-foot-thick) lean concrete with a minimum compressive strength of 140 kg/cm^2 (2,000 psi) will be backfilled between the bottom of the basemat and the base of the soil/rock excavation pit. The applicant stated that it will revise ~~COL 2.5(8)~~ in accordance with the wording in DCD Section 2.5.4.5. The staff reviewed the applicant’s response and noted that the applicant provided markups with the planned revisions and its intention of incorporating the description of the lean concrete backfill under the NI common basemat into DCD Section 2.5.4.5. Based on its review, the staff concludes that the applicant’s response properly described the requirements needed to characterize the properties of underlying materials (in this case the properties of the lean concrete backfill). The staff considers RAI 8-7847, Question 2.5.4-5, resolved. The updates to the DCD in a future revision are to include the information related to the aforementioned questions. The staff is tracking the updates to the DCD as **Confirmatory Item 2.5.4-3.** COL 2.5(11)

In RAI 1-7827, Question 2.5.4-2; RAI 8-7847, Questions 2.5.4-8 and 2.5.4-9; and RAI 149-8147, Question 2.5.4-15, the staff asked the applicant to clarify various aspects of the calculations of static and dynamic bearing capacity for safety-related structures, including their associated FOS. In its responses to RAI 1-7827, Question 2.5.4-2, dated May 12, 2015 (ADAMS Accession No. ML15132A592); RAI 8-7847, Questions 2.5.4-8 and 2.5.4-9, dated June 15, 2015 (ADAMS Accession No. ML15166A292); and RAI 149-8147, Question 2.5.4-15,

COL 2.5(13)

dated September 17, 2015 (ADAMS Accession No. ML15260B316), the applicant provided the requested information on the static and dynamic bearing capacity along with updates to the APR1400 DCD, including (1) two new sections with additional information, Section 2.5.4.10.1 and Section 2.5.4.10.2, (2) changes to Tier 1, Table 2.1-1, and Tier 2, Table 2.0-1, and (3) new COL Information items. In its responses, the applicant indicated that the previously labeled items, "Minimum Allowable Static Bearing Demand" and "Minimum Allowable Dynamic Bearing Demand," in Tier 1, Table 2.1-1, and Tier 2, Table 2.0-1, were revised to "Allowable Static Bearing Capacity" and "Allowable Dynamic Bearing Capacity," respectively. Furthermore, in response to a Chapter 3 RAI, RAI 255-8285, Question 3.8.5-16, the applicant revised the names of these parameters as, "Allowable Static Bearing Capacity for Seismic Category 1 Structures (Dead and Live Load)" and "Allowable Dynamic Bearing Capacity for Seismic Category 1 Structures (Design Load Combination including SSE load)." In the aforementioned edits, the applicant indicated that the allowable bearing capacities for all safety-related buildings, including buildings within the NI basemat, the EDGB, and the DFOT room, shall be greater than, or equal to, the maximum bearing demands, including an FOS appropriate to the design load combination for both static and dynamic cases.

DCD Tier 1, Table 2.1-1, and Tier 2, Table 2.0-1, which also provide the APR1400 site design parameters, specifies that the maximum static bearing demand for the APR1400 design is 957.6 kPa (20.0 kilopounds per square foot (ksf)) and that the maximum dynamic bearing demand is 2,872.8 kPa (60.0 ksf). As a result of these questions, the applicant included COL 2.5(11), tasking the COL applicant to evaluate the allowable bearing capacity of the subsurface based on the site-specific properties of underlying materials, including appropriate laboratory test data to evaluate strength, and to consider local site effects, such as fracture spacing, variability in properties, and evidence of shear zones.

The staff reviewed the applicant's response to RAI 1-7827, Question 2.5.4-2; RAI 8-7847, Questions 2.5.4-8 and 2.5.4-9; RAI 149-8147, Question 2.5.4-15; and applicable information on RAI 255-8285, Question 3.8.5-16, regarding details on the determination of the static and dynamic bearing capacity and associated FOS for the safety-related structures. The staff concludes that the applicant provided appropriate foundation bearing capacity requirements both under static and dynamic loading conditions. In addition, the applicant specified requirements that the COL applicant must apply to ensure adequate FOS when determining site-specific bearing capacity; therefore, the staff finds the site parameters for minimum allowable bearing capacity and the related requirements for the COL applicant reasonable. The staff concludes that the applicant provided adequate information to address all areas of concern identified in the aforementioned questions. The FOS for both the dynamic and static cases are conservative and used in state-of-the-practice methods. Consequently, the staff considers RAI 1-7827, Question 2.5.4-2; RAI 8-7847, Questions 2.5.4-8 and 2.5.4-9; and RAI 149-8147, Question 2.5.4-15, resolved. The updates to the DCD in a future revision are to include the information related to the aforementioned questions and applicable information from RAI 255-8285, Question 3.8.5-16. The staff is tracking these updates to the DCD as **Confirmatory Item 2.5.4-4.**

EDGB

In RAI 8-7847, Questions 2.5.4-8 and 2.5.4-10, and RAI 149-8147, Question 2.5.4-14, the staff asked the applicant to provide information on various aspects of the calculation of differential settlements for structures located inside the NI basemat and for safety-related structures outside the NI basemat, mainly the ~~EDG~~ and DFOT. In its response to RAI 8-7847, Questions 2.5.4-8 and 2.5.4-10, dated June 15, 2015 (ADAMS Accession No. ML15166A292), and RAI 149-8147, Question 2.5.4-14, dated September 17, 2015 (ADAMS Accession

differential

No. ML15260B316), the applicant provided the requested information on differential settlement, along with updates to the APR1400 DCD; changes to DCD Tier 1, Table 2.1-1, and DCD Tier 2, Table 2.0-1; and new COL Information items. Furthermore, in response to Chapter 3, RAI 255-8285, Question 3.8.5-7, dated December 29, 2017, the applicant revised the scope of the differential settlement assessment for several buildings and provided additional information about settlement characteristics as it relates to the structural stability of the foundation. This information is discussed and evaluated in appropriate sections of APR1400 DCD Section 3.8.5 and applicable chapters of this SER.

In its responses, the applicant updated applicable sections of DCD Tier 1, Table 2.1-1, and DCD Tier 2, Table 2.0-1, with information about the maximum allowable differential settlements for various scenarios. The applicant reported that the "maximum allowable differential settlement between buildings" is 76.2 mm (3.0 inches) between the NI and EDGB; NI and DFOT; and EDGB and DFOT under static load. The applicant reported that the "maximum allowable differential settlement inside buildings" applicable for all seismic Category I structures is 12.7 mm (0.5 inch) per 15.24 meters (50 feet) in all directions. Additionally, as part of the response to Chapter 3, RAI 255-8285, Question 3.8.5-7, the applicant indicated that the aforementioned values of differential settlement are to be used for "site suitability determination" purposes only and provided additional settlement criteria in Table 3.8-12 through Table 3.8-14 that any future COL applicant shall satisfy. The applicant updated COL 2.5(14), tasking the COL applicant to verify whether the predicted settlement exceeds the maximum differential settlement within and between buildings for site suitability determination, as specified in Tier 2, Table 2.0-1. In addition, if the predicted settlement exceeds the maximum value in Table 2.0-1, a detailed site specific evaluation shall be performed by a COL applicant to demonstrate acceptability. Furthermore, the COL applicant shall also meet settlement criteria specified in COL 3.8(18) for construction sequence and post construction settlement limits.

The staff reviewed the applicant's response to RAI 8-7847, Questions 2.5.4-8 and 2.5.4-10; RAI 149-8147, Question 2.5.4-14; and the applicable information on RAI 255-8285, Question 3.8.5-7 regarding the calculation of differential settlements for the NI basemat and for safety-related structures outside the NI basemat. In particular, the staff focused its review on the information provided in DCD Tier 1, Table 2.1-1, and Tier 2, Table 2.0-1. The staff reviewed the basis for the values of "maximum allowable differential settlement inside buildings" and "maximum allowable differential settlement between buildings" against various industry standard publications, for example, U.S. Army Corps of Engineers (USACE) manual "Engineering and Design, Settlement Analysis." In accordance to the USACE manual guidelines for differential settlement, the staff finds that a "maximum allowable differential settlement inside buildings" for all seismic Category I structures of 0.5 inches per 50 feet in all directions and a maximum allowable settlement between buildings of 3.0 inches, represents acceptable values for site suitability determination for the type of foundation and evaluated soil profiles. The staff evaluated additional settlement criteria presented in RAI 255-8285, Question 3.8.5-7, Table 3.8-12 through Table 3.8-14, and APR1400 DCD Section 3.8.5, in Chapter 3 of this SER.

The staff concludes that the applicant specified appropriate adequate foundation settlement limits as one of the measures that will ensure adequate site suitability determination. The staff further concludes that the applicant provided adequate information to address all areas of concern identified in the aforementioned questions. Consequently, the staff considers RAI 8-7847, Questions 2.5.4-8 and 2.5.4-10, and RAI 149-8147, Question 2.5.4-14, resolved. The updates to the DCD in a future revision are to include the information related to the

aforementioned questions and applicable information from RAI 255-8285, Question 3.8.5-7. The staff is tracking the updates to the DCD as **Confirmatory Item 2.5.4-5**.

In RAI 8-7847, Question 2.5.4-13, and RAI 367-8436, Question 2.5.4-16, the staff asked the applicant to clarify statements that were made related to backfill material dynamic properties. In its response to RAI 8-7847, Question 2.5.4-13, dated June 15, 2015 (ADAMS Accession No. ML15260B316), and RAI 367-8436, Question 2.5.4-16, dated February 15, 2016 (ADAMS Accession No. ML16047A005), the applicant provided the requested information along with updates to the APR1400 DCD and changes to DCD Tier 1, Table 2.1-1, and Tier 2, Table 2.0-1. In its response to RAI 8-7847, Question 2.5.4-13, the applicant stated, "For clarification to COL applicants, the shear moduli values are defined as the minimum and damping values are the maximum values." The staff needed more clarification in this statement because it may imply that the maximum values for backfill damping can be greater than 15 percent as is the case for strains larger than 0.1 percent, as stated in Tier 1, Table 2.1-1, and Tier 2, Table 2.0-1. In addition, SRP Section 3.7.1, "Seismic Design Parameters," states that "the maximum soil damping value acceptable to the staff is 15 percent." To avoid confusion with a COL applicant referencing the APR1400 design, the staff asked the applicant to clarify the purpose of the damping values listed. In its response, the applicant stated that the backfill material dynamic properties in the aforementioned tables are used as input to calculate the shear strain-compatible shear wave velocity profiles for the SFG backfill and that the strain-compatible shear strain values of the backfill cannot be greater than 15 percent.

The staff reviewed the applicant's response to RAI 367-8436, Question 2.5.4-16, and RAI 8-7847, Question 2.5.4-13, and concludes that the applicant provided adequate information to address all areas of concern identified in the aforementioned questions. Based on its review, the staff concludes that the applicant's response properly described the requirements needed to characterize the properties of underlying materials (in this case the backfill material dynamic properties). Consequently, the staff considers RAI 367-8436, Question 2.5.4-16, and RAI 8-7847, Question 2.5.4-13, resolved. The updates to the DCD in a future revision are to include the information related to the aforementioned questions. The staff is tracking the updates to the DCD as **Confirmatory Item 2.5.4-6.**

In RAI 8-7847, Question 2.5.4-7, the staff asked the applicant to "clarify the locations where no potential for liquefaction is allowed and to provide requirements for liquefaction potential for Seismic Category II structures that could degrade Seismic Category I structures." In its response to RAI 8-7847, Question 2.5.4-7, dated June 15, 2015 (ADAMS Accession No. ML15166A292), the applicant stated that no liquefaction potential is allowed adjacent to and under seismic Category I structures. In addition, the applicant stated that new COL applicants address the liquefaction potential of seismic Category II structures that have the potential to degrade seismic Category I structures to an unacceptable safety level. The applicant provided changes to the DCD sections and ~~COL 2.5(13)~~ COL 2.5(12) to address the aforementioned issues.

The staff reviewed the applicant's response to RAI 8-7847, Question 2.5.4-7, and concludes that the applicant provided adequate information to address all areas of concern identified in the aforementioned question. The staff considers that a "no liquefaction potential is allowed" adjacent to and under seismic Category I structures is a reasonable and conservative design basis. Consequently, the staff considers RAI 8-7847, Question 2.5.4-7, resolved. The staff confirmed that DCD Revision 1, dated March 10, 2017, was revised as committed in the RAI response. Accordingly, the staff considers RAI 8-7847, Question 2.5.4-7, closed.

Based on its review of the APR1400 DCD Tier 1 Table 2.1-1, Tier 2 Table 2.0-1, and Section 2.5.4, the staff concludes that the applicant provided adequate descriptions of the site-specific geotechnical and geophysical information and investigations that COL applicants must provide to determine the properties and stability of all soils and rock, which may affect the safety of nuclear power plant facilities under both static and dynamic loading conditions. The staff further concludes that the site-specific information and site investigation requirements and the design site parameters, as specified in Tier 1, Table 2.1-1, and Tier 2, Table 2.0-1, are reasonable, representative of a reasonable number of sites that may be considered for a COL application, consistent with general engineering practices, and sufficient to ensure that the relevant requirements of GDC 2 in Appendix A to 10 CFR Part 50 and of 10 CFR Part 100 can be met by COL applicants. Accordingly, the staff concludes that, with the exception of the verification of outstanding confirmatory items, APR1400 DCD Section 2.5.4 is acceptable.

2.5.4.5 Stability of Slopes, DCD Section 2.5.5

The staff reviewed the regulatory guidance and the description provided in DCD Tier 2, Section 2.5.5, regarding the site-specific information that COL applicants referencing the APR1400 design must provide to determine the stability of all slopes.

APR1400 DCD Section 2.5.5 states that no assumptions in regard to slope stability are used in the evaluation of the standard design and that the stability of all slopes will be a site-specific issue. Consequently, in RAI 58-8018, Question 2.5.5-1, the staff asked the applicant to provide a COL Information item requesting COL applicants referencing the APR1400 DCD to provide site-specific information in accordance with SRP Section 2.5.5 and to determine the static and dynamic stability of all natural and manmade slopes to ensure that the failure of any slope will not adversely affect the safety of the plant. In its response to RAI 58-8018, Question 2.5.5-1, dated August 11, 2015 (ADAMS Accession No. ML15223B183), the applicant included the ~~COL 2.5(14)~~, tasking the COL applicant to provide site-specific information about the static and dynamic stability of all natural and manmade soil and rock slopes, including embankments and dams. The applicant also stated that the APR1400 standard plant design is based on the premise that there is no site-specific potential for slope failure that could adversely affect the NI.

COL 2.5(15)

The staff reviewed the applicant's response and verified the incorporation of the related information on the markups. Therefore, the staff considers RAI 58-8018, Question 2.5.5-1, resolved. The staff confirmed that DCD Revision 1, dated March 10, 2017, was revised as committed in the RAI response. Accordingly, the staff considers RAI 58-8018, Question 2.5.5-1, closed.

Based on its review of the APR1400 DCD Tier 1, Table 2.1-1, and Tier 2, Table 2.0-1, Section 2.5.5, the staff concludes that the applicant provided adequate requirements that COL applicants must meet to determine the stability of all slopes, both natural and manmade, and to ensure that no slope at the site will adversely affect the safety of the plant facilities during the life of the plant. The staff further concludes that ensuring that no slope failure at the site will adversely affect the safety of the plant facilities during the life of the plant is a reasonable design basis and that the related COL application requirements are consistent with the guidance in SRP Section 2.5.5 and are in accordance with the relevant requirements of GDC 2 in Appendix A to 10 CFR Part 50 and 10 CFR Part 100. Accordingly, the staff concludes that, with the exception of the verification of outstanding confirmatory items, APR1400 DCD Section 2.5.5 is acceptable.