



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

January 20, 1995

Mr. Nicholas J. Liparulo
Nuclear Safety and Regulatory Activities
Westinghouse Electric Corporation
P.O. Box 355
Pittsburgh, Pennsylvania 15230

Dear Mr. Liparulo:

SUBJECT: WESTINGHOUSE SUPPORT OF NUCLEAR REGULATORY COMMISSION (NRC) REVIEW
ACTIVITIES ON THE AP600 DESIGN CERTIFICATION APPLICATION

The NRC staff remains committed to the timely and efficient review of the AP600 design certification application. The November 30, 1994, issuance of the draft safety evaluation report (DSER) marked an important milestone in the review process, but it is only an interim milestone. The staff is becoming increasingly concerned with important submittal delays and difficulties in scheduling meetings to resolve technical issues. In recent months, certain critical submittals from Westinghouse, such as Revision 2 to the probabilistic risk assessment (PRA), have been significantly delayed. In addition, the staff has noticed increased difficulty with setting up and holding meetings because of the availability of Westinghouse technical personnel. Some meetings have been delayed (sometimes by several months) and other scheduled meetings (sometimes involving many reviewers) have been canceled.

As we stated in the November 30, 1994, letter that transmitted the DSER on the AP600 design, resolution of the DSER items will be an iterative process, requiring many meetings between Westinghouse and staff representatives, followed by docketed information that is responsive to the staff's concerns. The staff is concerned that Westinghouse may not be supporting both technical information submittals and technical meetings in a timeframe to achieve the July 1994 expedited schedule. The following examples illustrate these concerns:

1. Revision 2 to the PRA was promised in December 1994. It is now expected no sooner than the end of January 1995. The NRC staff considers its review of the AP600 PRA to be critical to many of its review activities, because this information supports many other aspects of the AP600 design review. A 1 month delay in the delivery of the revised PRA will have a significant impact, not only on the PRA review, but on many other areas of the design review as well. The reviews related to the reliability of safety systems and the importance of non-safety-related systems, including issues regarding the regulatory treatment of non-safety-related systems, and source term, have all been impacted by the postponed submittal of this important document. In addition, meetings that the staff had requested be held in late 1994 to discuss the PRA and severe accident issues have also been delayed by several months.

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2. The staff now understands that key information that was expected to be included in the final test reports on the AP600 test facilities (specifically, those portions of the final test reports that will integrate test program data and analyses and apply them to the AP600 design) will now be provided in the Code Validation and Verification (V&V) Reports. The Code V&V Reports are not scheduled to be submitted until several months after the submission of the Final Test Reports. The staff is concerned that the October 1995 issuance date for the supplement to the DSER, which is intended only to address the closure of test program issues, is in jeopardy.
3. During a January 1995 meeting, the staff indicated to Westinghouse that all of the technical resolution meetings concerning structural issues for the AP600 design must be completed by March 1995 in order for both Westinghouse and the staff to perform the supporting and confirmatory analyses necessary to resolve these issues in a timeframe to support the final safety evaluation report (FSER). The staff is concerned that Westinghouse may not support resolution of these issues by March, with the subsequent revised analysis to be provided in a timeframe to allow the staff to properly complete its review in accordance with the expedited schedule.

The staff understands that Westinghouse must submit significant analysis and information to address the many concerns identified in the DSER, and that these efforts draw resources away from technical meetings. In addition, while the staff understands Westinghouse's need to prepare answers to address staff concerns at resolution meetings, such actions should not significantly delay these meetings. The July 1994 schedule was developed based on assurances by both the NRC staff and Westinghouse that sufficient resources would be applied to meet the milestones. Delays have an overall effect on the review schedule because of the cascading effect of certain issues on other related concerns.

Without sufficient support for both technical meetings and timely, high quality submittals, the expedited review schedule established for the AP600 design certification application in July 1994 will not be attainable. The July 14, 1994, memorandum to the Commission stated that the schedule presented in the paper was "an optimistic schedule with no margin that can be met only if the staff receives high quality responses that address its concerns and review needs in time to support the schedule." Implicit in this statement is the need to support technical meetings to identify resolutions to these technical concerns. We request that Westinghouse be prepared to discuss this matter and identify actions it intends to undertake to resolve this concern at the senior management meeting currently scheduled for February 9, 1995.

Mr. Nicholas J. Liparulo

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January 20, 1995

Issuance of the FSER and the final design approval decision in 1996 will only be possible through extensive cooperation between Westinghouse and the NRC staff as well as the timely and complete exchange of information.

Sincerely,

Original Signed Copy

Dennis M. Crutchfield, Associate Director
for Advanced Reactors and License Renewal
Office of Nuclear Reactor Regulation

Docket No. 52-003

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AP600

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