



January 31, 1992
LD-92-010

Docket No. 52-002

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Subject: Reliability Assurance Program

- References: (A) Letter LD-91-054, E. H. Kennedy (C-E) to D. M. Crutchfield (NRC), dated October 22, 1991
- (B) Letter, Division of Licensee Performance and Quality Evaluation RAIs, T. V. Wambach (NRC) to E. H. Kennedy (C-E), dated October 10, 1991

Dear Sirs:

Submittal of the enclosed report, "Reliability Assurance Program for the System 80+™ Nuclear Power Plant," fulfills the commitment of Reference (A), item 6, to provide a reliability assurance program description. Enclosure I provides brief descriptions of how the report responds to each question of Reference (B).

Should you have any questions on the enclosed material, please contact me or Mr. Stan Ritterbusch of my staff at (203) 285-5206.

Very truly yours,

COMBUSTION ENGINEERING, INC.

E. H. Kennedy
Director
Nuclear Systems Licensing

gdh:lw

Enclosures: As Stated
cc: J. Trotter (EPRI)
T. Wambach (NRC)

ABB Combustion Engineering Nuclear Power

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**RESPONSE TO NRC REQUESTS FOR ADDITIONAL INFORMATION
DIVISION OF LICENSEE PERFORMANCE AND QUALITY EVALUATION**

Question 1

Describe the basic framework of the RAP including the scope, objective, basic definitions and elements.

Response 1

The RAP Plan describes the basic framework, scope, definitions, and elements of the RAP.

Question 2

Describe the performance goals/targets, problem prediction and correction, and corrective actions program.

Response 2

The actual goals for the performance of systems important to safety are given in the PRA. System goals for production will be given in the RAMI when it is performed. The RAP Plan describes how these goals are to be met but does not repeat the goals themselves. Section 3.3 of the RAP plan describes the Corrective Actions Program.

Question 3

Describe how the RA^m will address plant aging concerns.

Response 3

The RAP addressed the plant aging concerns as part of the Reliability Centered Maintenance Program (Section 4). Equipment repairs are tracked and repair frequencies higher than expected are investigated.

Question 4

Describe the organization and administration aspects of the RAP.

Response 4

The organization and administration aspect of the RAP are generally described in the RAP Plan.

Question 5

Describe the approach for providing feedback to the designers when actual plant performance data consistently differs from the designers PRA/RAP assumptions.

Response 5

The PRA will be kept current with the plant operation by the use of a common data base for both the PRA and the RCM programs. If the designers are responsible to maintain the PRA then the feedback will be automatic. If the Utility elects to maintain the PRA themselves, the feedback will be through the Combustion Engineering Owners Group (CEOG).

Question 6

Describe the major programmatic interfaces between the RAP and other areas.

Response 6

The programmatic interfaces are described in the RAP Plan.

Question 7

Provide one example.

Response 7

No example was given in the RAP Plan, but one will be added in a future update.

Question 8

Will the C-E RAP differ from the EPRI Requirements Document description of a RAP?

Response 8

The RAP Plan is generally consistent with the EPRI description. The EPRI description repeated many of the RAMI goals in the plan but the C-E plan only refers to the goals that are in the PRA and RAMI reports.