



March 25, 1992
LD-92-038

Docket 52-002

Mr. Dennis M. Crutchfield
Acting Associate Director
for Advanced Reactors
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: CESSAR-DC Submittal Schedule Update

Dear Mr. Crutchfield:

We are in receipt of your letter dated March 4, 1992 entitled "CESSAR-DC Completeness of Submittals." We were pleased that you have reaffirmed your expectations to meet the schedule published in SECY 91-161.

In the last year, there has been a dramatic increase in both NRC and ABB-CE activity on the System 80+™ Design Certification review. The staff's determined effort to bring the necessary resources to bear on this review is obvious. This level of cooperation toward meeting the industry's design certification goals is appreciated, and ABB-CE anticipates its continuation to the completion of the certification process.

For our part, we agree that ABB-CE must continue to provide timely, high quality submittals. We are evaluating ways to provide information to the staff for review at the earliest date possible.

To that end, I am pleased to inform you that we are advancing our submittal target dates for Shutdown Risk information from May 31 and August 31, 1992, to April 30, June 15, and July 31, 1992. For planning purposes, the April 30 submittal will contain sufficient information to resolve the fire protection, ECCS recirculation capability, and fuel handling and heavy loads issues, as well as provide the current status of our assessment related to mid-loop operations. In addition, the System 80+™ design features which will enhance operator performance and simplify our planning and training will also be provided. The June 15 submittal should respond to the bulk of the RAI's and will correspond to the resolution of all of the major issues discussed with the NRC at the December 18, 1991 meeting on this subject, with the exception of the final probabilistic shutdown risk estimation. The latter will be provided in the July 31, 1992 submittal along with the final report.

ABB Combustion Engineering Nuclear Power

9204080186 920325
PDR ADDCK 05200002
A PDR

1000 Prospect Hill Road
Post Office Box 500
Windsor, Connecticut 06095-0500

Telephone (203) 698-1911
Fax (203) 285-9512
Telex 99297 COMBEN WSOR

Doyle
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As we have committed to maintain and update the System 80+™ PRA throughout the design's life cycle, there is no endpoint to the PRA updating process. We are in the process of updating the PRA to reflect the current status of the design and to address most of the concerns expressed by the NRC in the RAI's. We thus plan to make submittals related to this update process on May 31, July 31 and September 30, 1992. These submittals will address the human reliability analysis methodology issues, the level 2 phenomenology issues and a draft update of the level 1 analyses for internal events respectively. The May 31 submittal will also include a report on the use of the PRA in the design process, and the July 31 submittal will provide a program plan for maintenance of the PRA during the engineering, procurement and construction phases.

Additionally, ABB-CE will supply the following information to supplement responses already provided to RAI's:

1. Updated General Arrangement drawings by April 10, 1992.
2. Updated Radiation and fire zone drawings by April 17, 1992.
3. Hydrogen igniters system layout by April 17, 1992.
4. Revised P&ID's or flow diagrams for auxiliary systems by April 17, 1992.
5. A draft Section 7 (Analysis Requirements) of the System 80+™ Distribution Systems Design Guide by April 30, 1992.
6. Reactor coolant pump test results and evaluation applicable to System 80+™ loss-of-component cooling water and loss-of-seal injection by May 15, 1992.
7. An evaluation report of practicable increased pressure ratings for low pressure systems connected to the Reactor Coolant System by June 15, 1992.
8. A draft System 80+™ Distribution Systems Design Guide by July 31, 1992.
9. Preliminary piping analysis (including leak-before-break)/HVAC analysis/cable tray analysis by August 31, 1992.

We are also pursuing completion of the remaining miscellaneous RAI responses which promised future submittals. We will submit these as they are completed and expect to have the bulk of these finished by April 30, 1992. There are some RAI's which merit further discussion between ABB-CE and the NRC as to their applicability in the design certification review process. Included in this category are some related to PRA and operational support information.

We are now planning to submit the NEPA/SAMDA on or about April 30, 1992, instead of the previously scheduled May 31, 1992. The fire hazards assessment and the SRP deviations review submittals scheduled for March 31, 1992 will be mailed on schedule.

Regarding the ITAAC submittal, we have begun a major effort in-house which was discussed with your staff in the March 19, 1992 meeting on this topic. We plan to submit our first set of about ten representative Tier 1 descriptions and associated ITAAC's on or before April 30, 1992. I believe we will be able to achieve our mutual goal of agreeing upon the format, content and scope of the Tier 1 and ITAAC submittals before the draft Safety Evaluation Report is issued. It seems prudent to get the initial set of iterations between the NRC and ABB-CE behind us before setting the schedule for the submittal of the complete ITAAC package. However, based on the feedback we received at the March 19, 1992 meeting, we believe that we will be able to submit a large portion of the Tier 1 descriptions and ITAAC's prior to the issuance of the draft SER.

We look forward to further interacting with the NRC staff and management to resolve each issue while holding to these schedules in order to produce a timely design certification for the System 80+™ design.

Very truly yours,

COMBUSTION ENGINEERING, INC.



Charles B. Brinkman
Acting Director
Nuclear Systems Licensing

cc: Mr. James Taylor (NRC)
Dr. Thomas Murley (NRC)
Mr. Thomas Wambach (NRC)
Mr. Daniel Giessing (DOE)
Dr. Peter Lang (DOE)