



GE Nuclear Energy

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Docket No. STN 52-001
SLK 9275

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Mr. Dennis M. Crutchfield, Associate Director
for Advanced Reactors and License Renewal
Office of Nuclear Reactor Regulation
Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Crutchfield:

SUBJECT: ITAAC Stage 2 and Stage 3 Design Certification Material

This responds to your letter of May 29, 1992 in which you expressed concern that GE's Stage 2 ITAAC submittal contained several inconsistencies that, you believe, reflected a lack of internal quality assurance. GE does not agree that the items identified by the staff are in fact inconsistencies that reflect a lack of internal quality assurance. The basis for this conclusion is provided below.

In its correspondence with GE, the staff used the term "inconsistent" in different ways. It is necessary, therefore, to address the term in the context in which it was used.

In the enclosure to its memorandum dated May 7, 1992 which provided comments on GE's Stage 2 ITAAC submittal, the staff cited inconsistent treatment within individual system ITAAC as a specific shortcoming. However, the bulk of examples cited were not, in fact, due to inconsistent treatment within individual system ITAAC, but rather were a reflection of the graded approach being taken in the definition and development of ITAAC. This approach recognizes variations among systems relative to their importance. GE believes that the examples cited by the staff reflect a lack of common understanding of agreements reached on ITAAC scope and content in conjunction with the pilot review.

The first example of a perceived inconsistency cited by the staff in the memorandum dated May 29, 1992 pertained to a difference between information provided for the Control Habitability HVAC System in the Tier 1 design description and that contained in Chapter 15 of the SSAR. The specifics of this comment related to Chapter 15 defining the HVAC filter efficiency as 95% while the Tier 1 design description specified "80% filter efficiencies." The HVAC system contains a bag-type filter with 80% efficiency. For accident conditions, an additional emergency filter train consisting of HEPA filters and a charcoal bed is automatically initiated to raise the filtration efficiency as described in Chapter 9 of the SSAR.

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Another inconsistency cited by the staff in the May 29 memorandum dealt with the apparent staff conclusion that, should both air intakes into the control room be isolated at the same time, this is contrary to the SSAR analysis that requires a positive atmospheric pressure control system to perform its function. However, as described in the SSAR Chapter 9, the normal Control Room HVAC intake duct and exhaust fans do isolate on high radiation signal. Correspondingly, the emergency recirculation filter train is automatically initiated, which provides a reduced flow of outside air through high efficiency filtration and controls positive pressure of the control room. This apparent lack of clarity is regretted, but GE does not agree that it reflects a shortcoming in internal quality assurance.

The staff also noted that it is particularly difficult to assure consistency between Tier 1 and SSAR information because amendments to the SSAR have not been submitted in consonance with changes made to Tier 1 material. GE believes that this comment does not reflect the reality of the review process which, in effect, places the review of all sections of the SSAR in parallel. This process has resulted in changes to SSAR chapters flowing from the review progress on individual chapters rather than from progress on review of interfacing sections.

The staff noted that they believed another inconsistency to be that systems proposed for the Tier 1 document were not addressed in the SSAR. Examples cited were the Breathing Air system and the Dust Radiation Monitoring System (DRM). In regard to the Breathing Air system, Section 1.2.2.12.19 of the SSAR provides the discussion of that system and, consequently, there is no inconsistency with the Tier 1 document. In the case of the Dust Radiation Monitoring system, that system is part of the K6/7 project-unique ABWR design application but is not part of the standard ABWR design as submitted for Design Certification. In the initial listing of the standard ABWR systems to be addressed by the ITAAC, the DRM system was included but was clearly identified as not being a part of the ABWR for which GE is seeking certification. Future updates of that list of systems to be addressed by ITAAC will delete identification of the DRM system. When this has been done, neither the Tier 1 document nor the SSAR will discuss a DRM system.

With regard to the comments made regarding GE's commitment to provide "roadmaps" for a number of key analyses, it is GE's perception that development of "roadmaps" should follow Stage 2 and Stage 3 submittals and thus would begin after all Tier 1 information has been initially submitted. Now that the Stage 3 ITAAC submittal has been made (June 1, 1992), GE will start development of "roadmaps" and will work with the staff to put in place a list of the subjects/chapters to be covered.

With regard to the staff's comment in its May 29 memorandum that GE would not support discussions to address the comments contained in the May 7 memorandum, GE addressed many of them in the Stage 3 submittal. If we had interrupted our Stage 3

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preparation activity to discuss the comments, we would not have successfully met our commitment to make the Stage 3 submittal by June 1, 1992.

Lastly, it is GE's intention to assure that the Tier 1 material complies with the applicable requirements of Part 50, Appendix B. This will entail a verification process that, in GE's opinion, is best completed after completion of the highly interactive review/change process noted above. We would emphasize, however, that we have exercised appropriate checking measures in preparing the Stage 3 submittal.

As discussed in our last management meeting on May 7, we will need to carry out parallel actions to meet our mutual objective of a December 1992 Final Design Approval on ABWR. For this reason, I urge that we continue our face-to-face staff and management interactions and coordination on these types of subjects in order to resolve them in a timely way.

Sincerely,

R. C. Berglund
R. C. Berglund

cc: N. D. Fletcher
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