



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

December 12, 1996

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

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION ON WESTINGHOUSE AP600 TECHNICAL SPECIFICATIONS OPTIMIZATION METHODOLOGY

REFERENCE: LETTER, N. J. LIPARULO TO T. R. QUAY, "WESTINGHOUSE AP600 TECHNICAL SPECIFICATIONS APPROACH, ATTACHMENT 1 DATED MAY 3, 1996"

Dear Mr. Liparulo:

Based on our review of the optimization methodology, we found that, while conceptually your approaches appear adequate, your submittal lacks the detailed justification discussions necessary for the NRC staff to review and approve the proposed approaches. Discussed below are examples of the types of additional information we will require in order to be able to adequately review your proposals.

630.11. A detailed discussion needs to be proposed about how from a 72 hours "anchor point" for the Completion Time Logic of Figure 1, the four other possible outcomes were selected. That discussion should address specifically how repair times were arrived at, how uncertainties in such judgements were accounted for, how and why thermal-hydraulic criteria varied from the precedents of the STS, specifically how PRA was used to justify the selection of longer completion times and where that was done, and finally a discussion of the differences between the "conservative" and "realistic" analysis referred to in the Notes to Figure 1.

630.12. A detailed discussion needs to be provided about how 31 days was established as the "baseline" for surveillance frequency and what constitutes a "baseline chance". The discussion should provide justification for the other three possible outcomes on the upper branch of Figure 2, as well as an answer to the question in our June 6, 1996 letter concerning the appropriateness of only having a 24 hour frequency outcome for the lower branch of Figure 2.

630.13. The discussion of the sections labeled "Probabilistic Risk Assessment- AP600 Baseline" and "Probabilistic Risk Assessment- AP600 Importance Ranking" can only be fully evaluated by the staff after the submittal of the response to RAI 630.10 (which the first section implies has been made, when in fact, it has not been) and the finalization of the PRA Final Report. Therefore, those submittals need to be made and the response to the RAI should

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include not only the original information requested but also, as discussed in our November 20, 1996 meeting, a discussion of how PRA information was used in the TS and on what basis its use was justified.

630.14. There are a number of differences between Table 1 and the AP600 TS Rev. 2 that need to be explained as does the difference between the MODE 4 time of Table 2 and that of the STS.

The above comments are fully consistent with the conclusion we reached in our June 6, 1996 letter. In that letter, we stated that "we cannot conclude on the methodology because of the degree of subjectivity involved." We hope that these additional comments will help clarify our concerns about the subjectivity of the proposals and result in a prompt and complete response. If you have any questions, please contact Bill Huffman at (301) 415-1141.

Sincerely,

original signed by: Jerry N. Wilson

Theodore R. Quay, Director
Standardization Project Directorate
Division of Reactor Program Management
Office of Nuclear Reactor Regulation

Docket No. 52-003

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Docket No. 52-003
AP600

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