



HITACHI

GE Hitachi Nuclear Energy

Jerald G. Head
Senior Vice President
Regulatory Affairs

P.O. Box 780
3901 Castle Hayne Road
MC A18
Wilmington, NC 28402
USA

T 910 819 5692
F 910 362 5692
gerald.head@ge.com

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Docket No. 52-045

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Subject: Response to NRC Letter: GE Hitachi Nuclear Energy – United States Advanced Boiling-Water Reactor Design Certification Renewal Application (July 20, 2012)

In our letter of December 7, 2010, GE Hitachi Nuclear Energy (GEH)¹ applied for renewal of the Advanced Boiling Water Reactor (ABWR) design certification rule, which was initially issued in May 1997 (see 10 CFR Part 52, Appendix A). In the subject letter, the Nuclear Regulatory Commission (NRC) identified 28 items that it considers to be improvements or changes that could meet regulatory criteria for the NRC to impose in the renewal application under 10 CFR 52.59(b). The NRC requested that, within 60 days of the date of its letter, GEH identify which design changes would be incorporated in the renewal application and provide a schedule for submitting a revised application.

First and foremost, GEH considers the original ABWR design, as certified and as reflected in the renewal application, to adequately protect public health and safety and the common defense and security, and to be fully compliant with NRC regulations and orders in effect at the time the design certification was originally issued and those regulations that govern design certification renewal. To date, the NRC has not imposed for design certification renewals specific regulatory requirements other than 10 CFR 50.150 (aircraft impact assessment), which GEH addressed in the renewal application. Additionally, the NRC has not stated that any of the 28 items specifically represents a safety or security concern, or is an improvement that offers a substantial increase in safety or security, considering the costs of implementing such improvement. Rather, the 28 items are those potential changes that correct errors and address emerging issues since the initial certification that could improve safety and security or may offer efficiencies in the Part 52 licensing process for potential Combined License applicants.

Considering these factors, GEH has reviewed the list and plans to address the 28 items and to submit Revision 6 of the ABWR Design Control Document (DCD). GEH expects few changes in the design, but the licensing basis information in the DCD may change. The items will be addressed, as appropriate, through (1) changes to the DCD, which may include adding Combined License (COL) Information

¹ GEH is a successor entity of GE Nuclear Energy, which was the original applicant for the ABWR design certification.

Items; (2) changes to underlying documents that support the DCD (e.g., references in the DCD, which would then be updated in the DCD); (3) further analyses or evaluation of the items to determine an appropriate strategy to address the issues, which may or may not involve changes to the DCD or underlying supporting information.

Through more in-depth actions and assessments to address the items, GEH may identify questions that warrant further discussion with the NRC. As such, GEH proposes to submit Revision 6 of the ABWR DCD not later than the second quarter of 2014. This schedule will provide an opportunity to meet with NRC periodically as the revision is being developed to discuss those topics that may require further interactions and to provide periodic status updates. For planning purposes, GEH suggests meetings on an as-needed basis and routine quarterly meetings, beginning in the fourth quarter 2012, to ensure continuing progress on the application.

Please contact Patricia Campbell (202-637-4239) if you have questions. GEH looks forward to coordinating with the NRC to establish a meeting schedule.

Sincerely,



Jerald G. Head
Senior Vice President, Regulatory Affairs

Commitment:

Commitment	Type (check one)		Scheduled Completion Date (if Required)
	One-Time Action	Continuing Compliance	
Submit ABWR Design Control Document, Revision 6	X		By 6/30/2014

Enclosure: None

Cc: Daniel Roderick, GEH
Adrian Muniz, NRC