

Russ,

I am sending you staff Comment 13.3 (pasted below). Please contact me for any clarifications.

Thanks,

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10.4.1, Replace entire section with the following re-write:

DC and COL applications specify an ITAAC for the D-RAP to ensure that appropriate controls are applied to risk-significant SSCs. The objective of the D-RAP ITAAC is to ensure that the design bases and other requirements have been correctly translated into the detailed design documents used for procurement and construction. Subsequent activities, including system ITAAC, are predicated on the assumption that these documents are correct.

An acceptable D-RAP ITAAC would include a commitment that the design is consistent with the risk insights and key assumptions related to SSCs within the scope of the RAP (RAP SSCs). These insights and assumptions are derived from probabilistic, deterministic, and other methods of analysis used to identify and quantify risk. The Commission has stated that an Appendix B program assures that this will be the case (for safety-related SSCs). An analogous quality assurance program for other RAP SSCs can accomplish the same thing.

The acceptance criterion for the D-RAP ITAAC should ensure that the initial design of each RAP SSC has been subject to the applicable reliability assurance activities. In other words, procurement and construction documents have been controlled by appropriate procedures within the D-RAP. The D-RAP ITAAC applies to every SSC that is within the scope of the RAP when the COL is issued. When D-RAP ITAAC are written in this manner, the following guidance applies to their closure.

13.3

The licensee performs an analysis to verify that appropriate controls were imposed on the initial development and issuance of the documents required for procurement and construction of SSCs. (The initial design of an SSC is complete when all required documents have been approved at least once. This must be done by the licensee's responsible design organization.) Once the initial design has been issued using the appropriate D-RAP procedures, changes can only be implemented using the same programs. Consequently, modifications to the initial design do not alter the facts on which D-RAP ITAAC acceptance criteria rely. Accordingly, once the D-RAP ITAAC are satisfied for a given SSC, no further analysis is needed no matter how many design changes affect it. Modifications do not create a need to revisit, reopen, or maintain the D-RAP ITAAC.

The D-RAP ITAAC only confirms that applicable program controls were applied, while other inspections ensure that these controls are effective (e.g., staff inspectors verify that the design control program is adequate). Consequently, the D-RAP activities themselves are not addressed in the D-RAP ITAAC. Similarly, verifying that construction was done correctly and confirming that the as-built configuration is consistent with the approved design is done by other ITAAC. For this reason, the D-RAP ITAAC does not address construction activities or the as-built configuration.

A licensee may change the scope of the RAP, but this can only be accomplished in accordance with 10 CFR 52.98. As part of D-RAP, licensees will apply the appropriate controls of the D-RAP when they make design changes. For this reason, if an SSC is added to the RAP, it need not be added to the scope of the D-RAP ITAAC. If a RAP SSC is deleted, the responsible design organization will have to issue a design change. The approved change can be used to close the D-RAP ITAAC in lieu of procurement or construction documents for an SSC that is no longer in the RAP.

Comment:

Section 10.4.1 edits better clarify how the D-RAP ITAAC applies to SSCs within the scope of RAP, and requirements to change the scope of RAP.