

August 21, 2007

Ms. Andrea Sterdis, Manager
Licensing and Customer Interface
Regulatory Affairs and Standardization
Westinghouse Electric Company
Nuclear Power Plants
P.O. Box 355
Pittsburgh, PA 15230-0355

SUBJECT: WESTINGHOUSE AP1000 STANDARD COMBINED LICENSE TECHNICAL
REPORT- 71A, "AP1000 TEST SPECIFICATIONS AND PROCEDURES
(APP-GW-GLR-037), " REVISION 1.

Dear Ms. Sterdis:

By a letter dated September 22, 2006, Westinghouse Electric Company (Westinghouse) submitted Technical Report (TR) No. 71A, "AP1000 COL Standard Technical Report Submittal of APP-GW-GLR-037, Revision 0," for NRC review and approval. Subsequently, on May 11, 2007, Westinghouse submitted Revision 1 to TR- 71A. Westinghouse requested in TR-71A that AP1000 Combined Operating License (COL) Action Item 14.4-2 be closed. This COL Action Item is listed in Section 14.4 of the AP1000 Design Control Document (DCD) and requires the COL applicant to provide test specifications and test procedures for the preoperational and startup tests for NRC review and approval. The NRC staff has reviewed Westinghouse's TR-71A and concluded that COL Action Item 14.4-2 cannot be resolved completely until after the issuance of a COL.

Section 14.4.2 of the AP1000 DCD, COL Action Item 14.4-2 states:

The Combined License applicant is responsible for providing test specifications and test procedures for the preoperational and startup tests, as identified in Section 14.2.3, for review by the NRC.

Technical Report -71A outlines the process that is currently being used by Westinghouse to develop test specifications and draft procedures, and provides a list of test specifications and test procedures to be provided in draft form by Westinghouse to the prospective COL Holder. However, TR-71A does not include the actual test specifications and test procedures for NRC review and approval. Instead, TR-71A documents the development process for the preparation of 88 preoperational system test specifications and 59 startup test specifications, to be followed by 289 preoperational test procedures and 59 startup test procedures.

Technical Report -71A further states that the NRC will have the option to review sample preoperational and startup test specifications and the writer's guidelines utilized to develop the mentioned specifications at the Westinghouse design office to facilitate the review of TR-71A. As stated in TR-71A, Table 2.2, "Integrated Master Plan," preoperational and startup test

specifications will be completed in 2007, and draft preoperational and startup test procedures will be provided by the COL Holder in 2010. However, the process outlined in TR-71A for closure of COL Action Item 14.4-2 is inconsistent with corresponding guidance in Section C.III.4, "Combined License Action or Information Items," of Regulatory Guide 1.206, "Combined License Applications for Nuclear Power Plants."

Combined Operating License Action Item 14.4-2 calls for the actual submittal of test specifications and test procedures by a COL Holder to NRC onsite inspectors for review and approval before as-built systems and plant features are tested in the field. As described in Section 14.2 of the Standard Review Plan, the COL Holder is responsible for submitting a startup administrative manual that contains the administrative procedures and requirements that will govern the activities associated with the conduct of the plant initial test program. This manual should include the process used to develop, review, and approve test specifications and test procedures, including organizational units or personnel that are involved in performing these activities and their respective responsibilities. Involvement of the COL Holder is an intrinsic prerequisite to ensure adequate review and approval of test specifications and test procedures.

Based upon the above, the NRC inspection staff will need to review the actual test specifications and test procedures for each system to verify that preoperational and startup test specifications and test are acceptable before COL Action Item 14.4-2 can be categorized as closed. Accordingly, the closure of COL Action Item 14.4-2 will be subject to the NRC's construction inspection program to allow for the necessary plant as-built inspections and walkdowns.

Further, since the initial test program extends through to the start of commercial operation of the facility, a COL Applicant could propose to subsume COL Action Item 14.4-2 under the license condition that will be in place to authorize low-power and power ascension testing.

On this basis, the NRC staff has concluded that COL Action Item 14.4-2 cannot be closed until after the issuance of the COL.

Please contact me at (301) 415-1439, if you have any questions regarding this issue.

Sincerely,

/RA/

David H. Jaffe, Senior Project Manager
AP1000 Projects Branch 2
Division of New Reactor Licensing
Office of New Reactors

Project No. 740

cc: See next page

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Combined Operating License Action Item 14.4-2 calls for the actual submittal of test specifications and test procedures by a COL Holder to NRC onsite inspectors for review and approval before as-built systems and plant features are tested in the field. As described in Section 14.2 of the Standard Review Plan, the COL Holder is responsible for submitting a startup administrative manual that contains the administrative procedures and requirements that will govern the activities associated with the conduct of the plant initial test program. This manual should include the process used to develop, review, and approve test specifications and test procedures, including organizational units or personnel that are involved in performing these activities and their respective responsibilities. Involvement of the COL Holder is an intrinsic prerequisite to ensure adequate review and approval of test specifications and test procedures.

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