

REVISED RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

APR1400 Design Certification

Korea Electric Power Corporation / Korea Hydro & Nuclear Power Co., LTD

Docket No. 52-046

RAI No.: 69-7994

SRP Section: 03.09.06 – Functional Design Qualification and Inservice Testing Programs for Pumps, Valves, and Dynamic Restraints

Application Section: 3.9.6

Date of RAI Issue: 07/14/2015

Question No. 03.09.06-7

APR1400 DCD Tier 2, Section 3.9.6.5, "Relief Requests and Alternative Authorizations to ASME OM Code," indicates that relief requests will be made on a case-by-case basis. To address the current plans for relief requests and alternative authorizations to the ASME OM Code for the APR1400 reactor, the NRC staff requests that the APR1400 design certification applicant clarify Section 3.9.6.5 in the APR1400 DCD Tier 2 to describe any planned alternative requests under 10 CFR 50.55a(z), and relief requests under 10 CFR 50.55a(f)(6) or (g)(6) for the IST programs for pumps, valves, and dynamic restraints, as applicable. For example, Section 3.9.6.5 should specify whether any requests for relief from the ASME OM Code provisions are intended for IST activities of pumps, valves, or dynamic restraints in the APR1400 reactor. In addition, Section 3.9.6.5 should describe whether OM Code Cases will be implemented as part of the IST program for pumps, valves, and dynamic restraints as accepted in RG 1.192 as incorporated by reference in 10 CFR 50.55a, or as a separate alternative authorization pursuant to 10 CFR 50.55a(z).

Response – (Rev. 2)

DCD Section 3.9.6.5 will be revised to address the current plans for relief requests and alternative authorizations to the ASME OM Code, and implementing OM Code Cases as follows:

"In case implementing the full requirements of the ASME OM Code is impractical, the relief requests from the testing requirements of the ASME OM Code will be made on a case-by-case basis by the COL Applicant. The following information should be described in the relief requests.

- (1) Identification of the component by name, functions, ASME Section III Code class, and valve category as defined in ISTC of the ASME OM Code and pump group as defined in ISTB of the ASME OM Code.
- (2) Identification of the ASME OM Code requirements from which the applicant is requesting relief.
- (3) For a relief request under 10 CFR 50.55a(f)(6) or (g)(6), the basis for requesting the relief and an explanation of why compliance with the ASME OM Code is impractical.

Any alternative request will be also submitted by the COL applicant as applicable. For an alternative request pursuant to which 10 CFR 50.55a(z), details regarding the proposed alternative(s) demonstrating that (1) the proposed IST will provide an acceptable level of quality and safety, or (2) compliance with the specified requirement would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

ASME OM Code Cases will be implemented as part of the IST program for pumps, valves, and dynamic restraints as accepted in RG 1.192, if applicable.

Impact on DCD

DCD Section 3.9.6.5 will be revised as indicated in the attached markup.

Impact on PRA

There is no impact on the PRA.

Impact on Technical Specifications

There is no impact on the Technical Specifications.

Impact on Technical/Topical/Environmental Reports

There is no impact on any Technical, Topical and Environmental Report.

APR1400 DCD TIER 2

The COL applicant is to provide a table of all safety-related components that use snubbers

In case implementing the full requirements of the ASME OM Code is impractical, the relief requests from the testing requirements of the ASME OM Code will be made on a case-by-case basis by the COL Applicant. The following information should be described in the relief requests.

- (1) Identification of the component by name, functions, ASME Section III Code class, and valve category as defined in ISTC of the ASME OM Code and pump group as defined in ISTB of the ASME OM Code.
- (2) Identification of the ASME OM Code requirements from which the applicant is requesting relief.
- (3) For a relief request under 10 CFR 50.55a(f)(6) or (g)(6), the basis for requesting the relief and an explanation of why compliance with the ASME OM Code is impractical.

Any alternative request will be also submitted by the COL applicant as applicable. For an alternative request pursuant to which 10 CFR 50.55a(z), details regarding the proposed alternative(s) demonstrating that (1) the proposed IST will provide an acceptable level of quality and safety, or (2) compliance with the specified requirement would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

ASME OM Code Cases will be implemented as part of the IST program for pumps, valves, and dynamic restraints as accepted in RG 1.192, if applicable.

whether the snubber and/or component was evaluated for fatigue strength

3.9.6.5 Relief Requests and Alternative Authorizations to ASME OM Code

~~In case implementing the requirements of ASME OM Code is impractical, the relief request will be made on a case-by-case basis. Information provided will describe the specific area of relief requested, explain why conformance with ASME OM Code is impractical, and describe any alternative test pursuant to 10 CFR 50.55a.~~

3.9.7 [Reserved]

3.9.8 [Reserved]

3.9.9 Combined License Information

COL 3.9(1) The COL applicant is to provide the inspection results for the APR1400 reactor internals classified as non-prototype Category I in accordance with NRC RG 1.20.