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## 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.: 360-8452  
SRP Section: 18 – Human Factors Engineering  
Application Section:  
Date of RAI Issue: 01/11/2016

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### **Question No. 18-90**

The November 25, 2015 response to RAI 196-8164 (ADAMS Accession No. ML15329A386) Question No. 18-24 provides additional information about how the applicant intends to issue, review, and store design documents using the Review and Comment System. It also describes the independence of the Review and Comment System from the ITS (Information Tracking System) and the CAP (Corrective Action Program). While this response is helpful for understanding the way each system is used, it is still unclear how information enters and flows through the three systems. Additional information is needed to address NUREG-0711 Section 2.4.3 Criterion 2.

The Review and Comment System, ITS, and CAP are similar in the fact that they are all communication systems used to document, review, and resolve issues with the design. However, it is unclear how designers, reviewers, and other staff are to know which system to use for any particular issue. Errors made by designers in selecting a the correct system may render the processes ineffective or may cause important issues to go unnoticed by those that have the authority, skills, or responsibility to correct them.

Please clarify how KHNP intends to ensure that issues are entered into the appropriate system. Include any specific measurable criteria that identify when each of these process tools is appropriate as opposed to the other systems. Alternatively, a procedure may be submitted on the docket that addresses this. Also, describe any safeguards that are in place to ensure that entries that are mistakenly entered into the wrong system will be identified and moved to the correct system (or otherwise addressed). You may reference docketed material as needed (for instance, there is some information regarding making entries in the ITS and safeguards against preventing unauthorized personnel from making new entries in section 4.6 of the HFE program plan implementation plan.)

**Response**

The Review and Comment System, Issue Tracking System (ITS), and Corrective Action Program (CAP) have similar functions in terms of reducing errors and improving quality. However, there are no interactions between the three systems since each of the systems have their own role and purpose.

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**Impact on DCD**

There is no impact on the DCD.

**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, or Environmental Report.