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February 20, 2018  
Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Attention: Mr. William Ward  
Division of New Reactor Licensing

Docket No. 52-046  
MKD/NW-18-0029L

**Subject: Revised Response to RAI 232-7864 for Question 19-10 (Rev.2)**

**References: 1) NRC Request for Additional Information 232-7864, dated September 30, 2015**  
**2) KHNP Letter MKD/NW-17-0308L, Response to RAI 232-7864 for Question 19-10, dated September 28, 2017**  
**3) KHNP Letter MKD/NW-17-0363L, Revised Response to RAI 232-7864 for Question 19-10 (Rev.1), dated November 15, 2017**

KHNP is hereby submitting the response to RAI 232-7864, dated September 30, 2015. The revised response addresses Question 19-10 relating to the seismic margin analysis (SMA). The enclosure provides the revised response to RAI 232-7864 for Question 19-10 (Rev.2) (Non-Proprietary). As discussed in a recent meeting with the NRC staff, KHNP committed to include in the accompanying DCD markups reference to a self-assessment being completed on the APR1400 PRA-based SMA. The self-assessment of the PRA-based SMA will be finalized prior to issuance of DCD Rev. 3.

If additional information or clarification is required, please contact Daeyeun Ahn, Director of KHNP Washington DC Center at [ahn.daeyeun@khnp.co.kr](mailto:ahn.daeyeun@khnp.co.kr) or 703-388-0592.

Sincerely,

Han-gon Kim  
Project Manager  
Advanced Reactors Development Laboratory  
Korea Hydro & Nuclear Power Co., Ltd.

Enclosure: Revised Response to RAI 232-7864 for Question 19-10 (Rev.2) (Non-Proprietary)

**Enclosure**

Revised Response to RAI 232-7864 for Question 19-10 (Rev.2)

(Non-Proprietary)

February 20, 2018