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Docket No.: STN-52-003

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Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

ATTENTION: MR. R. W. BORCHARDT

SUBJECT: AP600 IMPLEMENTATION REPORT FOR REGULATORY TREATMENT OF NONSAFETY-RELATED SYSTEMS (WCAP-13856)

Dear Mr. Borchardt:

Please find enclosed for your review as a part of the AP600 design certification application, WCAP 13856, "AP600 Implementation of the Regulatory Treatment of Nonsafety-Related Systems Process" (non-proprietary). This report summarizes the evaluation performed to determine the significant nonsafety-related systems, structures, and components (SSCs) for the AP600. The report also provides proposed additional regulatory oversight for those SSCs identified as significant.

The process implemented for the AP600 and summarized in the report is consistent with that agreed to by the NRC and the industry at the May 20, 1993 regulatory treatment of nonsafety-related systems (RTNSS) meeting. On September 7, 1993, the NRC staff issued a draft Commission paper entitled, "Policy and Technical Issues Associated with the Regulatory Treatment of Non-Safety Systems." This draft paper contains positions that are intended to reflect agreements reached at the May 20, 1993 RTNSS meeting.

Preliminary review of the applicable portions of the September 7, 1993 draft staff position paper have identified one potentially significant inconsistency with the process applied to the AP600. Specifically, on page 6, item 5, "Non-safety system reliability/availability missions," the second paragraph specifies the need for graded safety classifications and graded requirements for I&C systems based on the importance safety of their functional reliability/availability missions. The process implemented for the AP600 applies the graded classification process to all AP600 mechanical, electrical and I&C equipment. The report evaluates the nonsafety-related SSCs to determine important front-line functions, such as normal residual heat removal, as well as important support functions, such as actuation, power supply, and HVAC. The philosophy stated in the second paragraph of item 5 should be revised to eliminate the focus on I&C systems only.

A more detailed review of the draft Commission paper is underway. Additional comments will be provided to the NRC staff to support the staff's schedule for finalization of the paper.

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The Attachment to this letter provides proprietary and nonproprietary versions of draft PRA revisions to support the report information. The draft PRA revisions provide additional detail including the focused PRA quantified results. The tables provided in the attachment 1 are referenced throughout the report. Subsequent to the submittal of this report and consistent with the AP600 integrated design certification schedule, the PRA will be revised in February 1994. The PRA revision will reflect design changes and will include requantification of both the baseline and focused PRAs. In February 1994, the revised PRA report will supersede the Attachment.

The information included in the report and the attachment to this letter are provided for your review as part of the AP600 design certification application. Your evaluation of the AP600 RTNSS implementation is expected to be included in the draft safety evaluation report scheduled for May 1994.

Meetings with the NRC staff to discuss the report have been scheduled for October 26, 1993.

The Westinghouse Electric Corporation copyright notice, proprietary information notice, application for withholding and affidavit are attached.

This submittal contains Westinghouse proprietary information consisting of trade secrets, commercial information or financial information which we consider privileged or confidential pursuant to 10CFR2.790. Therefore, it is requested that the Westinghouse proprietary information attached hereto be handled on a confidential basis and be withheld from public disclosures.

This material is for your internal use only and may be used for the purpose for which it is submitted. It should not be otherwise used, disclosed, duplicated, or disseminated, in whole or in part, to any other person or organization outside the Commission, the Office of Nuclear Reactor Regulation or the Office of Nuclear Regulatory Research without the express written approval of Westinghouse.

Correspondence with respect to the application for withholding should reference AW-93-526, and should be addressed to N. J. Liparulo, Manager of Nuclear Safety And Regulatory Activities, Westinghouse Electric Corporation, P.O. Box 355, Pittsburgh, Pennsylvania, 15230-0355.

Please contact Brian A. McIntyre on (412) 374-4334 if you have any questions concerning this transmittal.

N. J. Liparulo, Manager
Nuclear Safety & Regulatory Activities

/nja

Enclosure
Attachment

cc: T. Kenyon, NRC
R. Hasselberg, NRC
B. A. McIntyre, Westinghouse (w/o enclosures/attachments)