

**DG-1145 DISCUSSION ITEMS
NRC PUBLIC WORKSHOP
SEPTEMBER 21-22, 2006**

- 1) Section C.I.1.9: The guidance to address generic issues identified in NUREG-0933 in effect 6 months before the docket date of the COLA is inconsistent with proposed 10 CFR 52.79(a)(20). The rules and guidance for Regulatory Guides, SRPs, and operating experience are consistent and require an applicant to address the guidance in effect 6 months before docket date. Because "6 months before docket date" is not a fixed date known by either the staff or the applicant, does the staff agree that the guidance to applicants should be to consider generic issues, Regulatory Guides, SRPs, and operating experience in effect 6 months prior to the date of application?
- 2) Section C.I.6.1.1.1, Item (3)(e): This section currently states: "Operating experience has indicated that certain nickel-chromium-iron alloys (e.g., Alloy 690 and Alloy 182) are susceptible to primary water stress corrosion cracking (PWSCC) attributable to corrosion. Alloy 690 has improved stress corrosion cracking resistance in comparison to Alloy 600 ----". This should be reworded to say "Operating experience has indicated that certain nickel-chromium-iron alloys (e.g., Alloy 600 and Alloy 182) ---".
- 3) Section C.I.6.2.2.4: This section requests the results of tests performed as well as a detailed updated testing and inspection program. This request should be deleted on the same basis indicated in the responses to comments C.I.6.2.3.4-1, 4.4-1, 4.5-1 and C.I.6.4.5-1.
- 4) Section C.I.6.3.1 states "Describe how the ECCS design meets the relevant Commission policy, as described in SECY papers and corresponding staff requirement memoranda (SRMs)." It is generally not appropriate to request applicants to discern and comply with the Commission Policy from SECY papers and the corresponding SRMs. These documents have not been through the appropriate review processes for public and stakeholder comment to be considered guidance to the applicants. It is recommended that the guidance be more specific about which policy statements are intended to be used.
- 5) Section C.I.6.3.2.5 states "Describe how the regulatory oversight of the active nonsafety systems was considered in using the process of "regulatory treatment of non-safety systems" described in SECY-94-084." The results of the SECY document, and the SRM (which indicates that the Westinghouse comments on this item, as stated in the Attachment to NTD-NRC-94-4145 should be accommodated) should be documented in

some form of clear guidance to the industry. This SECY, the SRM and the WEC comments, are not readily available to the public.

- 6) The Main Steam Line Isolation Valve Leakage Control System (BWRs) has been eliminated in new BWR plants. It is recommended that the description be modified to make consistent with section C.I.10.4.4 in DG-1145. Per SECY 93-087, for new BWR plants that do not incorporate a main steam isolation valve leakage control system and for which turbine bypass system holdup and plateout of fission products is credited in the analysis of design basis accident radiological consequences, demonstrate consistency with the seismic analysis described in SECY 93-087.
- 7) Lead-in info states "The applicants should state its intentions with regard to its adoption of risk informed categorization and treatment of structures, systems and components in accordance with 10 CFR 50.69." Generally, this should be done once in Section 3.2, not in the various sections of the FSAR discussing the SSCs. [Duplicate of comment on C.I.6.]
- 8) Section C.III.1, Chapter 6, General: This General section is written to generally duplicate C.I.6. It should be written to identify what is necessary beyond the referenced DCD consistent with the intent of C.III.1.
- 9) Section C.III.1.6.2.7 states "COL applicant that reference a certified design do not need to include additional information" while there is not the correspond section in C.I.6.2. Recommend this section be deleted.
- 10) Section C.I.13.2: The second sentence of the first paragraph refers to requalification programs as required in 10 CFR 50.54 (i)(1-1). This section of the proposed revision to 50.54 states "Within three months after issuance of an operating license, the licensee shall have in effect an operator requalification program which must as a minimum, meet the requirements of § 55.59(c) of this chapter." The industry believes that the proposed part 52 rule language published in the federal register on March 13, 2006 should be incorporated in this section. Specifically "Within three (3) months after either the issuance of an operating license or the date the Commission makes the finding under §52.103(g) of this chapter for a combined operating license, as applicable, the licensee shall have in effect an operator requalification program." Does NRC staff agree?
- 11) Sections C.I.13.2.1.1 (1) and 13.2.1.2 refer to development of a schedule including course durations for the licensed operator training program and each part of the training program for each functional group of employees. NRC concurred with the industry's comment that the predetermination of the course durations is inconsistent with the systems approach to training (SAT) as described in 10 CFR 55.4 and required in this section. Industry

recommends removal of requirements for course durations and timelines from the FSAR. Does NRC agree?

- 12) Sections C.I.13.2.1.1 (1) and 13.2.1.2 specify the development of program implementation timelines. The industry believes the level of detail requested in these FSAR section is beyond that necessary to support required COL findings. Consistent with SECY-05-0197, industry believes that timeline information should be supplied as part of program implementation materials separately from the FSAR. Does NRC agree?
- 13) Section C.I.13.2.1.1 (9) specifies evaluation of training program effectiveness for all employees in accordance with SAT. Industry believes that the FSAR section 13.2 only includes specific training programs for personnel detailed in the section (e.g. licensed personnel and personnel covered by 10 CFR 55.120.) Does NRC agree?
- 14) General: It has been observed that there are statements made in Appendix I that "guidance has been revised" or "guidance will be revised" when, in fact, the corresponding guidance has not been revised. For example, Item C.I.3.6.3-3 response states that representative material properties may be used in the application, and that the guidance in section 3.6.3(1)(b) will be modified. The draft guidance for that section has not been modified.
- 15) There are examples in the guidance, Appendix 1, where a proposal by industry was accepted by the Staff but the disposition for the item states "No change to DG-1145". For example, Item C.I.3.13.1.4-1 questioned the availability of pre-service inspection data for threaded fasteners at the time the COLA is submitted. The response acknowledges that it is likely the results won't be available but the disposition states that no change to the guidance is necessary. In this and similar examples, the response and disposition to a comment in Appendix 1 should be consistent with the text in the body of the guidance.
- 16) Section C.IV.2.3 What is the status of electronic COLA issues discussed by the NRC IT staff at the July workshop, including hyperlinking between files, max file size, etc.?
- 17) Section C.IV.2.3.3 states "Each page must include a change indicator (e.g., a bold vertical line at the margin adjacent to the portion that has been changed) and a page change identification including either the date of change, revision, or both," and Appendix A, Section 4.3.3 states "each changed page must include both a change indicator for the area changed (for example, a bold line vertically drawn in the margin adjacent to the portion actually changed)...." 1) The requested change indicator is very difficult for figures. Would the NRC consider relaxation of this specific

“change indicator” request for figures if the page change identification is provided? 2) Does the guidance intend that the Rev # would be changed, e.g., from Rev 0 to Rev 1, on every page of the application if only a few pages were impacted by the Revision 1 changes, or would Rev 0 continue to be identified on the pages that did not change (per this guidance)?

18) Section C.IV.3.3.3 states “Some generic TS and investment protection short-term availability controls contain values in brackets []. The brackets are placeholders indicating that the NRC’s review is not complete, and represent a requirement that the applicant for a combined license referencing the AP1000 DCR must replace the values in brackets with final plant-specific values.” The generic TS have a COL Information Item that requires the information in the brackets to be replaced with plant specific information. However, there is no such COL Information Item for the short-term availability controls in the AP1000 DCD Section 16.3. The only COL Information Item is to provide a procedure. Further, there is no compelling reason to replace the bracketed generic information in the short-term availability controls. The required procedure can be written with the plant specific information without any change to Section 16.3. Additionally, leaving the bracketed material in Section 16.3 would remove the need to revise the FSAR Section each time there was a minor plant specific change to the material such as position titles. Would it be acceptable to leave the bracketed material in the AP1000 DCD Section 16.3?

19) Section C.IV.7.1.3 lists the following for pre-application discussion topic “analysis needed to support offsite power analysis with RTO.” What does the staff have in mind here?

20) Sections C.IV.6.2 and C.IV.6.3 state “The requirements of 10 CFR 51.50(c)(4) specify that a site redress plan must be included in the environmental report.” This is not consistent with NUREG-1555, which provides ER content review guidance to the staff, nor RG 4.2 which provides ER format and content guidance to the applicant. If the redress plan is expected to be provided in the ER, format guidance is needed. Specifically, the guidance needs to indicate where in the ER the SRP is expected to be placed.