

Changes From Revision 2 to Revision 3

Item	Location	Description of Change
1.	S18, entire chapter	Grammar, format, syntax, and tense changes for readability – editorial.
2.	S18, entire chapter	Specific NEDO-33217 section references are removed. The document is evolving and the sections as written will likely change.
3.	Page 18-v	Acronym and Abbreviation list modified to reflect chapter 18 content
4.	S18, entire chapter	Replaced “COL holder” with “COL applicant”
5.	S18.1, 3 rd para.	Reworded for clarity and to reflect deletion of Appendices A, B & C
6.	S18.1, 3 rd para	Added to respond to RAI 19.2-37
7.	S18.1, 6 th para	Added to respond to RAI 18.2-3
8.	S18.1.2, bullet list	Added seventh bullet for clarity
9.	S18.1.3.2	Deleted reference to deleted appendices
10.	S18.1.6.1, 6 th para,	Deleted 1 st sentence and moved 2 nd sentence to 3 rd paragraph for clarity.
11.	Figure 18.1-1	Figure replaced to reflect greater technical correctness.
12.	S18.2.2 (2), bullet list	Rewrote list for clarity
13.	S18.2.2 (4d), bullet list	Broke out information into bullet for clarity
14.	S18.2.3 (3)	Phrase “files by the COL applicant or GE” deleted
15.	S18.3.2, 1 st para	Corrected citation
16.	S18.3.2.4	Changed OER wording to match meaning.
17.	S18.3.3, bullet list	Revised fourth bullet for clarity
18.	S18.3.3, bullet list	Revised last bullet in response to RAI 18.3-18
19.	S18.4.1,(3)	Rewrote (3) 1 st paragraph for clarity
20.	S18.4.1 (3), 1st bullet	Changed bullet to include “indications” for consistency
21.	S18.4.2 (3)	Rewrote (3) 1 st paragraph for clarity
22.	S18.5.1 (3)	Rewrote (3) 1 st paragraph for clarity
23.	S18.5.1, RSR output list	Procedure outline deleted for technical correctness

24.	S18.6.2	Rewrote paragraph for clarity
25.	T18.6-1	Renamed table and rewrote assignment for clarity
26.	S18.6.6, bullet list	Deleted last bullet, added two bullets for clarity
27.	S18.7.2, 1 st para	Added response to RAI 18.7-15 AB.
28.	S18.7.2, 3 rd para	Added response to RAI 18.7-15 C.
29.	S18.7.2, 7 th para	Added response to RAI 18.7-15A
30.	S18.8	Rewrote for clarity
31.	S18.8.1 (3)	Deleted two bullet for clarity
32.	S18.10.4.3, bullet list	Rewrote seventh and eighth bullet for clarity
33.	S18.10.4.4, bullet list	Rewrote entire bullet list for clarity
34.	S18.10.5	Rewrote entire section for clarity
35.	S18.11.1, 4 th bullet item	Reference to lower tiered NEDO-33276 document removed
36.	S18.12.1, 1 st sentence	Reference to lower tiered NEDO-33278 document removed
37.	S18.12.2.2, 2 nd para	Response for RAI 18.12-1
38.	S18.12.3, bullet list	Added last three bullets.
39.	S18.13.3, 4 th para	Reworded for clarity.
40.	S18.13.3	Response to RAI 18.13.1F
41.	S18.13.4	Added Summary Report Section
42.	Appendices A, B, & C	<p>Deleted.</p> <p>The process for developing procedures, including EOPs, is required to be part of the overall top-down process for developing the ESBWR HFE program. That process is described in Section 18.9. Prerequisites for developing procedures include completion of the HRA/PRA, the operational analysis, and the design of the HSI. Technical guidelines derive from a process that has not started since the engineering data is not available.</p> <p>Instead of providing “best guess” EPGs, the process for developing the EPG/SAGs is described in more detail and requires compliance with 10 CFR 50.34(f)(2), DG-1145, SRP 13.5, SRP 18, NUREG-0711, NUREG-0899 and NEI 94-01. Generic ESBWR EPG/SAGs will be provided for NRC review and approval in a manner similar to that used for operating plants and in a timely fashion to support HFE V&V and operator training and licensing.</p>