

**~~Proposed~~ Interim Staff Guidance  
Review of Evaluation to Address Gas  
Accumulation Issues in Safety Related Systems ~~and Systems Important to Safety~~  
DC/COL-ISG-019**

**Issuance Status**

Notice of Availability

**Purpose**

The purpose of this interim staff guidance (ISG) is to clarify the U.S. Nuclear Regulatory Commission (NRC) staff guidance to address issues of gas accumulation in ~~safety-related~~ **Safety Related Systems (SRSs)** and systems **important to safety**. This ISG revises and updates the guidance previously provided in the cited Standard Review Plan (SRP) sections below related to the subject of gas accumulation in Safety Related Systems ~~and non-safety related systems as appropriate (e.g., systems designated as Regulatory Treatment of Non-Safety Systems [RTNSS], see References 1 and 2).~~

**Background**

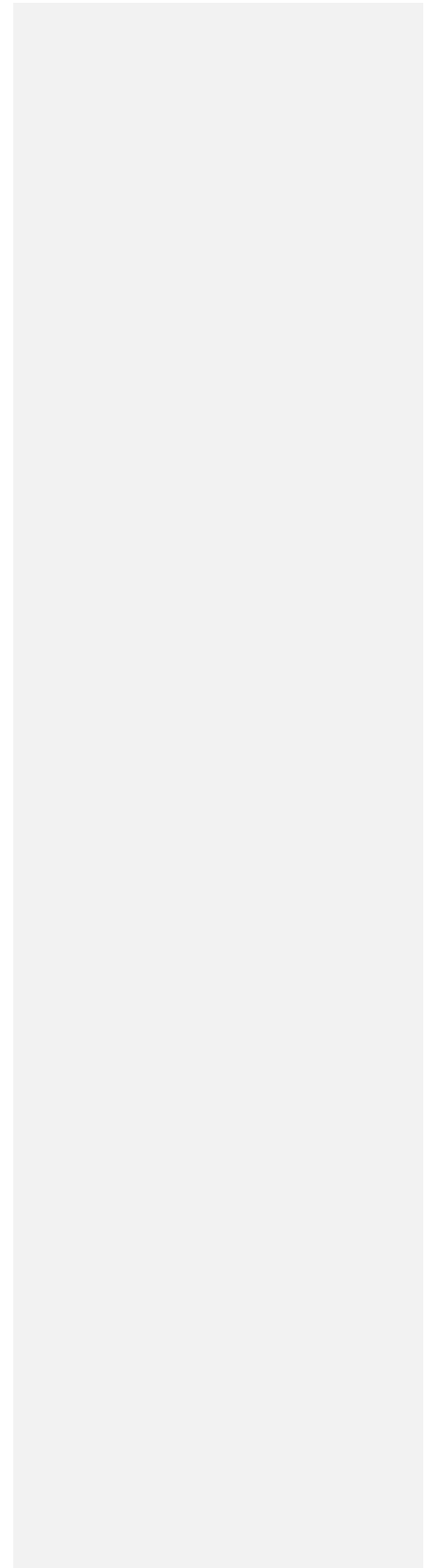
Instances of gas accumulation in ~~safety-related systems~~ **Safety Related Systems (SRSs)** have occurred since the beginning of commercial nuclear power plant operation. The NRC has issued a number of Information Notices and Generic Letters (GL) on the subject. In January 2008, the NRC staff issued GL 2008-01 to comprehensively address gas accumulation issues in operating reactors. Prior to that, in March 2007, the NRC revised SRP Sections 5.4.7, "Residual Heat Removal System," 6.3, "Emergency Core Cooling System," and 6.5.2, "Containment Spray System." The SRP revisions included limited mention of gas accumulation concerns but did not include specific concerns to the extent covered in GL 2008-01 (Reference 73). These include sources of gas, gas accumulation locations, determination of gas quantities, water hammer and acceptable gas quantity, pump operation and acceptable gas quantity and control of gas. In reviewing the current applications for certified designs and combined licenses (COL) filed under Title 10 of the *Code of Federal Regulations*, Part 52 (10 CFR Part 52), the NRC staff finds that the March 2007 SRP staff guidance does not provide sufficient guidance to adequately evaluate applicants' treatment of gas accumulation issues as above. This ISG is being issued to revise and update the March 2007 guidance to address these concerns.

**Issue**

Gas accumulation in ~~safety-related~~ nuclear power plant systems has been known to cause water hammer, gas binding in pumps, and inadvertent relief valve actuation that may damage pumps, valves, piping, and supports and may lead to loss of system operability. SRP Sections 5.4.7, 6.3 and 6.5.2 do not provide sufficient guidance to ensure that the gas accumulation concerns raised in GL 2008-01 are adequately addressed in applications for certified designs or COLs filed under 10 CFR Part 52.

**Rationale**

The NRC staff finds the current guidance insufficient to review certified design and COL applicants' treatment of the gas accumulation concerns raised in GL 2008-01. In order to ensure compliance with Appendix A and Appendix B to 10 CFR Part 50, the following areas have been identified as needing additional guidance:



1. Potential Gas Accumulation Locations & Intrusion Mechanisms
2. Pipe and Instrumentation Drawing (P&ID) and Isometric Drawing Confirmation
3. Surveillance and Venting Procedures

#### Proposed Staff Guidance

In the near term, the NRC staff should apply this ISG for the review of certified design and COL applications. This ISG contains three major review areas including: 1) potential gas accumulation locations ~~&and~~ intrusion mechanisms, 2) P&ID and isometric drawing confirmation and 3) surveillance and venting procedures. The guidance below describes general review criteria to be used in the review of design certification (DC)/COL applications to address the gas accumulation issue. ~~In addition, the NRC staff shall use the information and guidance contained in NEI 09-10 (Reference 4) to evaluate the applicants' treatment of gas accumulation concerns. In particular, the gas accumulation issue should be addressed for Safety Related Systems, as well as non-safety related systems as appropriate.~~

1. Potential Gas Accumulation Locations & Intrusion Mechanisms

NRC staff ~~shall~~should evaluate whether the applicant has identified potential gas accumulation locations and intrusion mechanisms in ~~safety-related systems~~systems ~~important to safety including Safety Related Systems~~ and described preventive measures for each. Typical potential gas accumulation locations may include, but are not limited to, local high points, pipe diameter changes and normally closed valves. Typical gas intrusion mechanisms may include, but are not limited to, water level monitoring instrumentation, valve leakage and sump strainers.

2. P&ID and Isometric Drawing Confirmation

NRC staff ~~shall~~should verify that inspections, tests, analyses, and acceptance criteria (ITAAC) exist that require applicants to compare the as-built plant configuration to the P&ID and isometric drawings to confirm ~~all that potential gas accumulation areas locations and intrusion mechanisms in systems important to safety~~ have been properly identified and that appropriate prevention measures are in place. The applicant ~~must~~should address any discrepancies regarding potential gas accumulation areas that were not previously identified in the P&ID and isometric drawings.

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3. Surveillance and Venting Procedures

The NRC staff ~~shall~~should verify that the DCD or COL applicant address the potential for gas accumulation in systems important to safety ~~issue~~ on a programmatic basis that includes verification of adequate vents or other design features to prevent or mitigate gas accumulation. NRC staff should confirm that applicants ~~have~~describe surveillance and venting procedures that aim to prevent gas accumulation and minimize or eliminate gas ~~when ever~~ identified. Procedures should also include a means to track and trend

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accumulated gas such that problem areas can be systematically identified, monitored and corrected. A procedures training program should be described that acceptably addresses up-to-date generic industry training guidance.

**Applicability**

This ISG is applicable to all DC and COL applications submitted under 10 CFR Part 52. It shall remain in effect until it has been superseded, withdrawn, or incorporated into revisions of the applicable SRP sections and Regulatory Guide 1.206.

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## Backfit Discussion

The requirements of Section 50.109 provide that a backfit analysis is not necessary for DC and COL applications currently under review<sup>1</sup>.

## References

1. ~~Ruland, William H., "Preliminary Assessment of Responses to Generic Letter 2008-01, 'Managing Gas Accumulation in emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems' and Future NRC Staff Review Plans," NRC letter to James H. Riley, Nuclear Energy Institute, Agencywide Documents Access and Management System (ADAMS) accession no. ML091390637, May 28, 2009.~~
2. ~~Beaulieu, David P., "Forthcoming Meeting with the Nuclear Energy Institute (NEI) to Discuss NRC Generic Letter 2008-01, 'Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems,'" NRC Memorandum, ADAMS accession no. ML083250536, November 21, 2008.~~
3. ~~"Revision 2 to NRC Staff Criteria for Gas Movement in Suction Lines and Pump Response to Gas," ADAMS accession no. ML090900136, March 26, 2009.~~
4. ~~Preliminary Assessment of "Testing and Evaluation of Gas Transport to the Suction of ECCS Pumps," Westinghouse Electric Company LLC, WCAP-16631-NP, Revision 0, October 2006. (This document has not been provided to NRC on the docket. Referenced information is based on notes from reading the reference.)~~
5. ~~Beaulieu, David P., "Summary of the September 4, 2008, Category 2 Public Meeting with the Nuclear Energy Institute to Discuss NRC Generic Letter 2008-01, 'Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems,'" NRC Memorandum, ADAMS accession no. ML082770088, October 6, 2008.~~
6. ~~Wert, Leonard D., Jr., "Task Interface Agreement—Emergency Core Cooling System (ECCS) Voiding Relative to Compliance with Surveillance Requirements (SR) 3.5.1.1, 3.5.2.3, and 3.5.3.1 (TIA 2008-03)," NRC Memorandum from Director, Division of Reactor Projects, Region II, ADAMS accession no. ML082560209, October 21, 2008.~~
1. SECY-95-132, "Policy, Technical, and Licensing Issues Associated with the Regulatory Treatment of Non-Safety Systems (RTNSS) in Passive Plant Designs (SECY-94-084)", May 22, 1995
2. Staff Requirements Memorandum for SECY-95-132, June 28, 1995
- 7.3. GL 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal and Containment Spray Systems," January 11, 2008.

<sup>1</sup> The AP1000 and advanced boiling-water reactor certified designs which are already closed, will not be deemed a backfit but may be required to address the issue under separate provisions.

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4. Riley, James H., "Issuance of NEI 09-10, Revision 0, Guidelines for Effective Prevention and Management of System Gas Accumulation," Communication from NEI Director of Engineering, ML093130090, October 30, 2009.

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