

Resolution of Comments

IP 65001.21 – “Inspection of Pipe Rupture Hazards Analyses Design Acceptance Criteria (DAC)-Related ITAAC”

Source	Comment	Added	Remarks
RI	Section 01.01: DCD not introduced. Add Design Certification Document (DCD) at first usage of DCD	Yes	
RI	Section 02.02 c): Aspect should be Aspects	Yes	
RI	Guidance: Add how NUREG-0800, Sections 3.6.1 and 3.6.2 should be used in the inspection process.	Yes	Added sentence to Guidance referring to acceptance criteria spelled out in Sections 3.6.1 and 3.6.2
RI	Inspection Sample Guidance: Reference to “packages” is unclear. The expected content of HELB and MELB packages needs to be defined or the uncertainty of what is to be reviewed will lead to scope problems.	Yes	Added sentence to define what is meant by a design “package.”
RI	Inspection Sample Guidance: For purposes of inspection who is the “design agency”? Clarify in the text.	Yes	
RI	Section 02.03: Add “Confirm by a walk down sample that the installed piping configuration and support hardware is installed per the piping design and piping ISOs.”	Yes	
RI	References: Add 10CFR50, appendix A, GDC 4, design for postulated pipe ruptures	Yes	
RIV	Section 02.02: First sentence, following the phrase, “performed across a...” add the word “representative sample”	Yes	

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RIV	Section 02.02 (b): The As-Designed Pipe Rupture Hazards Analysis Report, supporting the DAC/ITAAC process is a quality affecting activity which is based on computer analysis. Therefore, evaluation of design controls related to computer software verification and validation development should be included in this section. Specifically, inspection activities should be expanded to confirm the development and life-cycle control process supporting safety-related activities, including; software development, configuration control, software procurement, support services, and software version control.	See Remarks	<p>This aspect could be added, however, by the current process, all codes they use per SRP 3.9.1 to be included (and already approved) in the DCD or in the license (if they depart the DCD). That list is already reviewed and approved during the process prior to licensing. Any computer code used that is not in the DCD would have to be added thru amendment to the license and would require a review thru that process.</p> <p>Per NRO/DE recommendation- added a step verifying that all computer codes used in the analysis are in the DCD/license (and thereby approved). This would be a more viable change.</p>