

## 1.9S Conformance with Regulatory Criteria

### 1.9S.1 Conformance with Regulatory Guides

Table 1.9S-1 lists the applicable Division 1 and Division 8 Regulatory Guides (RGs) effective in March 2007 with which STP 3 & 4 conform for the site-specific portions of the facility design not included in the reference ABWR DCD, as well as those RGs effective after March 2007 that were incorporated during the application review. The operational aspects of the facility are included. The table also includes those RGs with which the departures taken from the reference ABWR DCD conform. Table 1.9S-2 addresses STP 3 & 4 conformance with those RGs annotated as "COL Applicant" in the reference ABWR DCD Table 1.8-20.

Division 4 RGs are addressed in the Environmental Report with one exception for RG 4.15 (addressed herein); and Division 5 RGs are addressed in the Security Plan.

### 1.9S.2 Conformance with the Standard Review Plan

Table 1.9S-3 addresses conformance with the March 2007 Standard Review Plan (SRP) for the site-specific portions of the facility design not included in the reference ABWR DCD, including the operational aspects of the facility. The table also addresses the SRP sections noted in the reference ABWR DCD Table 1.8-19 as the responsibility of the COL Applicant. Table 1.9S-4 addresses conformance with the March 2007 SRP for the Tier 1 and Tier 2\* departures.

### 1.9S.3 Generic Issues

RG 1.206 states that COL applicants should address applicable unresolved safety issues and medium- and high-priority generic safety issues identified in NUREG-0933 for the site-specific portions of the facility design not included in the reference ABWR DCD, including how they pertain to operational aspects of the facility. The only applicable medium- or high-priority generic issue listed in NUREG-0933, Appendix B, Rev. 21, dated June 30, 2006, is new Generic Issue 156.6.1 regarding pipe break effects on systems and components. The site-specific portions of the STP 3 & 4 design that are not included in the reference ABWR DCD meet the requirements of SRP 3.6.1, Rev. 3 and 3.6.2, Rev. 2, dated March 2007.

Table 1.9S-5 addresses generic issues identified in Table 19B of the reference ABWR DCD as the responsibility of the COL applicant.

### 1.9S.4 Operational Experience (Generic Communications)

RG 1.206 states that COL applicants who reference a certified design should address only those generic communications applicable to the portions of their facility not included in the design certification and which have been issued after the SRP update (March 2007). Additionally, for COL applicants that include departures from the referenced certified design, the departures should address the applicable Generic Letters and Bulletins in effect/issued up to six months before the submittal date of the COL and issued after the SRP update.

The NRC issued no Generic Letters and Bulletins between the March 2007 update of the SRP and September 2007.

Table 1.9S-6 addresses those generic communications (Generic Letters and Bulletins) that were identified in the reference ABWR DCD Table 1.8-22 as the responsibility of the COL applicant.

**Table 1.9S-1 Site-Specific Conformance with Regulatory Guides**

No.	Title	Rev.
<b>Division 1</b>		
1.3	Assumptions Used for Evaluating the Potential Radiological Consequences of a Loss-of-Coolant Accident for Boiling Water Reactors	2 (6/74)
1.5	Assumptions Used for Evaluating the Potential Radiological Consequences of a Steamline Break Accident for Boiling Water Reactors	0 (3/71)
1.6	Independence Between Redundant Standby (Onsite) Power Sources and Between Their Distribution Systems	0 (3/71)
1.8	Personnel Selection and Training	See QAPD Part IV
1.21	Measuring, Evaluating, and Reporting Radioactivity in Solid Wastes and Releases of Radioactive Materials in Liquid and Gaseous Effluents from Light-Water-Cooled Nuclear Power Plants	1 (6/74)
1.22	Periodic Testing of Protection System Actuation Functions	0 (2/72)
1.23	Meteorological Monitoring Programs for Nuclear Power Plants	1 (3/07)
1.25	Assumptions Used for Evaluating the Potential Radiological Consequences of a Fuel Handling Accident in the Fuel Handling and Storage Facility for Boiling and Pressurized Water Reactors	0 (3/72)
1.26	Quality Group Classifications and Standards for Water-, Steam-, and Radioactive-Waste-Containing Components of Nuclear Power Plants	See QAPD Part IV
1.27	Ultimate Heat Sink for Nuclear Power Plants	2 (1/76)
1.28	Quality Assurance Program Requirements (Design and Construction)	See QAPD Part IV
1.29	Seismic Design Classification	See QAPD Part IV
1.33	Quality Assurance Program Requirements (Operations)	See QAPD Part IV
1.37	Quality Assurance Requirements for Cleaning of Fluid Systems and Associated Components of Water-Cooled Nuclear Power Plants	See QAPD Part IV
1.43	Control of Stainless Steel Weld Cladding of Low-Alloy Steel Components	0 (5/73)
1.53	Application of the Single-Failure Criterion to Nuclear Power Plant Protection Systems	2 (11/03)

**Table 1.9S-1 Site-Specific Conformance with Regulatory Guides (Continued)**

<b>No.</b>	<b>Title</b>	<b>Rev.</b>
1.54	Service Level I, II, and III Protective, Coatings Applied to Nuclear Power Plants	See QAPD Part IV
1.59	Design Basis Floods for Nuclear Power Plants	2 (8/77)
1.60	Design Response Spectra for Seismic Design of Nuclear Power Plants	1 (12/73)
1.61	Damping Values for Seismic Design of Nuclear Power Plants	1 (3/07)
1.68	Initial Test Programs for Water-Cooled Nuclear Power Plants	3 (3/07)
1.75	Physical Independence of Electric Systems	3 (2/05)
1.76	Design-Basis Tornado and Tornado Missiles for Nuclear Power Plants	1 (3/07)
1.78	Evaluating the Habitability of a Nuclear Power Plant Control Room During a Postulated Hazardous Chemical Release	1 (12/01)
1.91	Evaluations of Explosions Postulated to Occur on Transportation Routes Near Nuclear Power Plants	1 (2/78)
1.92	Combining Modal Responses and Spatial Components in Seismic Response Analysis	2 (7/06)
1.96	Design of Main Steam Isolation Valve Leakage Control Systems for Boiling Water Reactor Nuclear Power Plants	1 (6/76)
1.97	Criteria for Accident Monitoring Instrumentation for Nuclear Power Plants	4 (6/06)
1.98	Assumptions Used for Evaluating the Potential Radiological Consequences of a Radioactive Offgas System Failure in a Boiling Water Reactor	0 (3/76)
1.102	Flood Protection for Nuclear Power Plants	1 (9/76)
1.105	Setpoints for Safety-Related Instrumentation	3 (12/99)
1.109	Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the Purpose of Evaluating Compliance with 10 CFR Part 50, Appendix I	1 (10/77)
1.111	Methods for Estimating Atmospheric Transport and Dispersion of Gaseous Effluents in Routine Releases from Light-Water-Cooled Reactors	1 (7/77)
1.112	Calculation of Releases of Radioactive Materials in Gaseous and Liquid Effluents from Light-Water-Cooled Power Reactors	1 (3/07)
1.113	Estimating Aquatic Dispersion of Effluents from Accidental and Routine Reactor Releases for the Purpose of Implementing Appendix I	1 (4/77)
1.115	Protection Against Low-Trajectory Turbine Missiles	1 (7/77)
1.117	Tornado Design Classification	1 (4/78)
1.122	Development of Floor Design Response Spectra for Seismic Design of Floor-Supported Equipment or Components	1 (2/78)
1.132	Site Investigations for Foundations of Nuclear Power Plants	2 (10/03)
1.135	Normal Water Level and Discharge at Nuclear Power Plants	0 (9/77)

Table 1.9S-1 Site-Specific Conformance with Regulatory Guides (Continued)

No.	Title	Rev.
1.138	Laboratory Investigations of Soils and Rocks for Engineering Analysis and Design of Nuclear Power Plants	2 (12/03)
1.140	Design, Inspection, and Testing Criteria for Air Filtration and Adsorption Units of Normal Atmosphere Cleanup Systems in Light-Water-Cooled Nuclear Power Plants	2 (6/01)
1.142	Safety-Related Concrete Structures for Nuclear Power Plants (Other than Reactor Vessels and Containments)	2 (11/01)
1.143	Design Guidance for Radioactive Waste Management Systems, Structures, and Components Installed in Light-Water-Cooled Nuclear Power Plants	2 (11/01)
1.153	Criteria for Safety Systems	1 (6/96)
1.160	Monitoring the Effectiveness of Maintenance at Nuclear Power Plants [per NEI 07-02]	2 (3/97)
1.165	Identification and Characterization of Seismic Sources and Determination of Safe Shutdown Earthquake Ground Motion	0 (3/97)
1.182	Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants [per NEI 07-02]	0 (5/00)
1.189	Fire Protection for Nuclear Power Plants	1 (3/07)
1.194	Atmospheric Relative Concentrations for Control Room Radiological Habitability Assessments at Nuclear Power Plants	0 (6/03)
1.198	Procedures and Criteria for Assessing Seismic Soil Liquefaction at Nuclear Power Plant Sites	0 (11/03)
1.199	Anchoring Components and Structural Supports in Concrete	0 (11/03)
1.204	Guidelines for Lightning Protection of Nuclear Power Plants	0 (11/05)
1.206	Combined License Applications for Nuclear Power Plants	0 (6/07)
1.208	A Performance-Based Approach to Define the Site-Specific Earthquake Ground Motion	0 (3/07)
<u>1.221</u>	<u>Design-Basis Hurricane and Hurricane Missiles for Nuclear Power Plants</u>	<u>0 (10/11)</u>
<b>Division 4</b>		
4.15	Quality Assurance for Radiological Monitoring Programs (Normal Operation) – Effluent Streams and the Environment	1 (2/79)

**Table 1.9S-1 Site-Specific Conformance with Regulatory Guides (Continued)**

<b>No.</b>	<b>Title</b>	<b>Rev.</b>
<b>Division 8</b>		
8.1	Radiation Symbol	0 (2/73)
8.4	Direct-Reading and Indirect-Reading Pocket Dosimeters	0 (2/73)
8.5	Criticality and Other Interior Evacuation Signals	1 (3/81)
8.6	Standard Test Procedure for Geiger-Muller Counters	0 (5/73)
8.7	Instructions for Recording and Reporting Occupational Radiation Exposure Data	2 (11/05)
8.8	Information Relevant to Ensuring that Occupational Radiation Exposures at Nuclear Power Stations Will Be as Low as Is Reasonably Achievable	3 (6/78)
8.9	Acceptable Concepts, Models, Equations, and Assumptions for a Bioassay Program	1 (7/93)
8.10	Operating Philosophy for Maintaining Occupational Radiation Exposures as Low as Is Reasonably Achievable	1-R (5/77)
8.13	Instruction Concerning Prenatal Radiation Exposure	3 (6/99)
8.15	Acceptable Programs for Respiratory Protection	1 (10/99)
8.20	Applications of Bioassay for I-125 and I-131	1 (9/79)
8.26	Applications of Bioassay for Fission and Activation Products	0 (9/80)
8.27	Radiation Protection Training for Personnel at Light-Water-Cooled Nuclear Power Plants	0 (3/81)
8.28	Audible-Alarm Dosimeters	0 (8/81)
8.29	Instruction Concerning Risks from Occupational Radiation Exposure	1 (2/96)
8.32	Criteria for Establishing a Tritium Bioassay Program	0 (7/88)
8.34	Monitoring Criteria and Methods To Calculate Occupational Radiation Doses	0 (7/92)
8.35	Planned Special Exposures	0 (6/92)
8.36	Radiation Dose to the Embryo/Fetus	0 (7/92)
8.38	Control of Access to High and Very High Radiation Areas of Nuclear Plants	1 (5/06)

**Table 1.9S-2 Conformance with Regulatory Guides Noted as “COL Applicant” in DCD**

<b>No.</b>	<b>Title</b>	<b>Conformance</b>
1.16	Reporting of Operating Information Appendix A Technical Specifications, Rev. 4	RG 1.16, Rev. 4 does not reflect current regulations. STP 3 & 4 will conform to 10 CFR 50.72 and 10 CFR 50.73.
1.33	Quality Assurance Program Requirements (Operations)	See QAPD Part IV.
1.71	Welder Qualifications for Areas of Limited Accessibility, Rev. 0	Refer to Subsection I0.3.6.3.
1.86	Termination of Operating Licenses for Nuclear Reactors, Rev. 0	Not applicable.
1.90	Inservice Inspection of Prestressed Concrete Containment Structures with Grouted Tendons, Rev. 1	Not applicable.
1.114	Guidance on Being Operator at the Controls of a Nuclear Power Plant, Rev. 1	STP 3 & 4 meets the intent of this guide by having sufficient operators on duty in the control room to assure visual contact with reactor controls and instrumentation during routine log rounds.
1.127	Inspection of Water-Control Structures Associated with Nuclear Power Plants, Rev. 1	Not applicable.
1.134	Medical Evaluation of Licensed Personnel for Nuclear Power Plants, Rev. 2	Conforms.
1.149	Nuclear Power Plant Simulation facilities for Use in Operator License Examinations, Rev. 1	The simulator will be certified in accordance with RG 1.149, Rev. 3 and ANSI/ANS 3.5-1998.

**Table 1.9S-3 Site-Specific Conformance with Standard Review Plan**

<b>No.</b>	<b>Title</b>	<b>Rev.</b>
<b>Chapter 1 – Introduction and General Description of the Plant</b>		
1.0	Introduction and Interfaces	0 (3/07)
<b>Chapter 2 – Site Characteristics</b>		
2.0	Site Characteristics and Site Parameters	0 (3/07)
2.1.1	Site Location and Description	3 (3/07)
2.1.2	Exclusion Area Authority and Control	3 (3/07)
2.1.3	Population Distribution	3 (3/07)
2.2.1-2.2.2	Identification of Potential Hazards in Site Vicinity	3 (3/07)
2.2.3	Evaluation of Potential Accidents	3 (3/07)
2.3.1	Regional Climatology	3 (3/07)
2.3.2	Local Meteorology	3 (3/07)
2.3.3	Onsite Meteorological Measurements Programs	3 (3/07)
2.3.4	Short-Term Atmospheric Dispersion Estimates for Accident Releases	3 (3/07)
2.3.5	Long-Term Atmospheric Dispersion Estimates for Routine Releases	3 (3/07)
2.4.1	Hydrologic Description	3 (3/07)
2.4.2	Floods	4 (3/07)
2.4.3	Probable Maximum Flood (PMF) on Streams and Rivers	4 (3/07)
2.4.4	Potential Dam Failures	3 (3/07)
2.4.5	Probable Maximum Surge and Seiche Flooding	3 (3/07)
2.4.6	Probable Maximum Tsunami Hazards	3 (3/07)
2.4.7	Ice Effects	3 (3/07)
2.4.8	Cooling Water Canals and Reservoirs	3 (3/07)
2.4.9	Channel Diversions	3 (3/07)
2.4.10	Flooding Protection Requirements	3 (3/07)
2.4.11	Low Water Considerations	3 (3/07)
2.4.12	Groundwater	3 (3/07)
2.4.13	Accidental Releases of Radioactive Liquid Effluents in Ground and Surface Waters	3 (3/07)
2.4.14	Technical Specifications and Emergency Operation Requirements	3 (3/07)
2.5.1	Basic Geologic and Seismic Information	4 (3/07)
2.5.2	Vibratory Ground Motion	4 (3/07)
2.5.3	Surface Faulting	4 (3/07)

**Table 1.9S-3 Site-Specific Conformance with Standard Review Plan (Continued)**

<b>No.</b>	<b>Title</b>	<b>Rev.</b>
2.5.4	Stability of Subsurface Materials and Foundations	3 (3/07)
2.5.5	Stability of Slopes	3 (3/07)
<b>Chapter 3 – Design of Structures, Components, Equipment, and Systems</b>		
3.2.1	Seismic Classification	2 (3/07)
3.2.2	System Quality Group Classification	2 (3/07)
3.3.1	Wind Loadings	3 (3/07)
3.3.2	Tornado Loadings	3 (3/07)
3.4.2	Analysis Procedures	3 (3/07)
3.5.1.3	Turbine Missiles	3 (3/07)
3.5.1.4	Missiles Generated by Tornadoes and Extreme Winds	3 (3/07)
3.5.3	Barrier Design Procedures	3 (3/07)
3.7.1	Seismic Design Parameters	3 (3/07)
3.7.2	Seismic System Analysis	3 (3/07)
3.8.4	Other Seismic Category I Structures	2 (3/07)
	Appendix B	2 (3/07)
	Appendix C	2 (3/07)
3.8.5	Foundations	2 (3/07)
<b>Chapter 8 – Electrical Power</b>		
8.1	Electric Power – Introduction	3 (3/07)
8.2	Offsite Power system	4 (3/07)
	Appendix A	4 (3/07)
<b>Chapter 9 – Auxiliary Systems</b>		
9.2.1	Station Service Water System	5 (3/07)
9.2.2	Reactor Auxiliary Cooling Water Systems	4 (3/07)
9.2.4	Potable and Sanitary Water Systems	3 (3/07)
9.2.5	Ultimate Heat Sink	3 (3/07)
9.3.1	Compressed Air System	2 (3/07)
9.3.3	Equipment and Floor Drainage System	3 (3/07)
9.5.1	Fire Protection Program	5 (3/07)
	Appendix A	5 (3/07)
9.5.2	Communications Systems	3 (3/07)



**Table 1.9S-3 Site-Specific Conformance with Standard Review Plan (Continued)**

No.	Title	Rev.
<b>Chapter 10 – Steam and Power Conversion System</b>		
10.4.5	Circulating Water System	3 (3/07)
<b>Chapter 11 – Radioactive Waste Management</b>		
11.5	Process and Effluent Radiological Monitoring Instrumentation and Sampling Systems	3 (7/81)
	BTP 11-6 Postulated Radioactive Releases due to Liquid-Containing Tank Failures	3 (3/07)
<b>Chapter 12 – Radiation Protection</b>		
12.5	Operational Radiation Protection Program	3 (3/07)
<b>Chapter 13 – Conduct of Operations</b>		
13.1.1	Management and Technical Support Organization	5 (3/07)
13.1.2-13.1.3	Operating Organization	6 (3/07)
13.2.1	Reactor Operator Requalification Program; Reactor Operator Training	3 (3/07)
13.2.2	Non-Licensed Plant Staff Training	3 (3/07)
13.3	Emergency Planning	3 (3/07)
13.4	Operational Programs	3 (3/07)
13.5.1	Administrative Procedures	0 (7/81)
13.5.1.1	Administrative Procedures - General	0 (3/07)
13.5.1.2	Administrative Procedures – Initial Test Program	0 (6/96)
13.5.2.1	Operating and Emergency Operating Procedures	2 (3/07)
	Appendix A	2 (3/07)
13.5.2.2	Maintenance and Other Operating Procedures	0 (4/96) DRAFT
13.6	Physical Security	3 (3/07)
13.6.1	Physical Security – Combined License Review Responsibilities	0 (3/07)
<b>Chapter 17 – Quality Assurance</b>		
17.5	Quality Assurance Program Description - Design Certification, Early Site Permit and New License Applicants	0 (3/07)

Table 1.9S-4 Conformance of Tier 1 and Tier 2\* Departures with the SRP

Departure Number	Subject	Affected COLA Sections	Applicable SRP Sections	Conformance with Applicable SRP/ Justification for Differences
STD DEP T1 1.1-1	Definition of As-Built	Tier 1 Section 1.1	14.3	Conforms with applicable SRP section
STD DEP T1 2.1-2	RIP Motor Casing Cladding	Tier 1 Section 2.1 Tier 2 Section 5.3	5.3.1 5.3.3	Conforms with applicable SRP sections
STD DEP T1 2.2-1	Control System Changes	Tier 1 Section 2.2 Tier 1 Section 2.15 Tier 2 Section 7.2 Tier 2 Section 7.6 Tier 2 Section 7.7 Tier 2 Section 10.1 Tier 2 Section 16.3.3.1.1 Tier 2 Section 16B.3.3.1.1	1.0 App 7.0-A 7.1 7.2 7.3 7.6 7.7	Conforms with applicable SRP sections
STD DEP T1 2.3-1	Hi Rad MSIV Closure	Tier 1 Section 2.3 Tier 1 Section 2.7 Tier 2 Section 1.2 Tier 2 Appendix 1A Tier 2 Section 3.4 Tier 2 Section 5.2 Tier 2 Section 7.1 Tier 2 Section 7.2 Tier 2 Section 7.3 Tier 2 Section 7.5 Tier 2 Section 15.2 Tier 2 Section 16.3.3.1.1 Tier 2 Section 16.3.3.6.1 Tier 2 Section 16B.3.3.1.1 Tier 2 Section 16B.3.3.6.1	1.0 3.4.1 5.2.5 7.1 Table 7.1 App 7.1-A 7.2 7.3 7.5 11.5 13.3 15.2.1-15.2.5 16.0	Conforms with applicable SRP sections

Table 1.9S-4 Conformance of Tier 1 and Tier 2\* Departures with the SRP (Continued)

Departure Number	Subject	Affected COLA Sections	Applicable SRP Sections	Conformance with Applicable SRP/ Justification for Differences
STD DEP T1 2.4-1	RHR Spent Fuel Pool Cooling	Tier 1 Section 2.4	3.2.1	Conforms with applicable SRP sections
		Tier 1 Section 2.6	3.2.2	
		Tier 2 Appendix 1AA	5.4	
		Tier 2 Section 3.1	5.4.7	
		Tier 2 Section 3.9	6.3	
		Tier 2 Appendix 3MA	6.6	
		Tier 2 Section 5.4	7.3	
		Tier 2 Section 6.3	7.4	
		Tier 2 Section 6.6	9.1.1	
		Tier 2 Section 7.3	9.1.2	
		Tier 2 Section 7.4	9.1.3	
		Tier 2 Section 9.1	9.1.4	
		Tier 2 Appendix 19L	9.1.5	
		Tier 2 Appendix 19Q	13.4	
			19.1	
			19.2	

Table 1.9S-4 Conformance of Tier 1 and Tier 2\* Departures with the SRP (Continued)

Departure Number	Subject	Affected COLA Sections	Applicable SRP Sections	Conformance with Applicable SRP/ Justification for Differences
STD DEP T1 2.4-2	FW Line Break Mitigation	Tier 1 Section 2.4 Tier 2 Section 5.2 Tier 2 Section 6.2 Tier 2 Section 7.3 Tier 2 Section 8.1 Tier 2 Section 8.3 Tier 2 Section 10.2 Tier 2 Appendix 19L Tier 2 Section 16.3.3.1.1 Tier 2 Section 16.3.3.1.4 Tier 2 Section 16B.3.3.1.1 Tier 2 Section 16B.3.3.1.4	3.2.2 3.6.2 3.6.3 3.8.3 3.11 5.2.2 5.2.3 5.2.4 5.2.5 6.2.1.1C 6.2.1.2 6.2.1.3 6.2.1.4 6.2.2 6.2.3 6.2.4 6.5.2 6.6 9.2.2 9.2.3 10.2 16.0	Conforms with applicable SRP sections

Table 1.9S-4 Conformance of Tier 1 and Tier 2\* Departures with the SRP (Continued)

Departure Number	Subject	Affected COLA Sections	Applicable SRP Sections	Conformance with Applicable SRP/ Justification for Differences
STD DEP T1 2.4-3	RCIC Pump	Tier 1 Section 2.4 Tier 2 Appendix 1A Tier 2 Section 3.2 Tier 2 Section 3.9 Tier 2 Appendix 3B Tier 2 Appendix 3MA Tier 2 Section 5.4 Tier 2 Section 6.2 Tier 2 Section 7.3 Tier 2 Section 14.2 Tier 2 Section 16.3.3.1.1 Tier 2 Section 16.3.3.1.4 Tier 2 Section 16B.3.3.1.1 Tier 2 Section 16B.3.3.1.4 Tier 2 Section 19.3 Tier 2 Section 19.9 Tier 2 Section 19.11 Tier 2 Section 19.13 Tier 2 Appendix 19K Tier 2 Appendix 19M	3.2.2 5.4 5.4.6 5.4.7 6.2.1.2 6.2.1.3 6.2.1.4 6.2.1.5 6.2.2 6.2.4 7.3 14.2 16.0 16.1 19.1 19.2	Conforms with applicable SRP sections
STD DEP T1 2.4-4	RHR, HPCF, and RCIC Turbine Pump NPSH	Tier 1 Section 2.4 Tier 2 Section 5.4 Tier 2 Section 6.2 Tier 2 Section 6.3 Tier 2 Appendix 6C Tier 2 Section 14.2	6.2	Conforms with applicable SRP sections

Table 1.9S-4 Conformance of Tier 1 and Tier 2\* Departures with the SRP (Continued)

Departure Number	Subject	Affected COLA Sections	Applicable SRP Sections	Conformance with Applicable SRP/ Justification for Differences
STP DEP T1 2.5-1	New Fuel Storage Racks	Tier 1 Section 2.5 Tier 2 Section 1.2 Tier 2 Section 3.1 Tier 2 Section 9.1 Tier 2 Section 12.3 Tier 2 Section 16.4	9.1.1 9.1.2	Conforms with applicable SRP Sections
STD DEP T1 2.10-1	Addition of Condensate Booster Pumps	Tier 1 Section 2.10	10.4.7	Conforms with applicable SRP sections
STD DEP T1 2.12-1	Breaker/Fuse Coordination	Tier 1 Section 2.12	14.3 14.3.6	Conforms with applicable SRP sections
STD DEP T1 2.12-2	I&C Power Division	Tier 1 Section 2.12 Tier 2 Section 8.1 Tier 2 Section 8.3	App 7.1-C	Conforms with applicable SRP section

Table 1.9S-4 Conformance of Tier 1 and Tier 2\* Departures with the SRP (Continued)

Departure Number	Subject	Affected COLA Sections	Applicable SRP Sections	Conformance with Applicable SRP/ Justification for Differences
STD DEP T1 2.14-1	Hydrogen Recombiner Elimination	Tier 1 Section 2.2	3.2.2	Conforms with applicable SRP sections
		Tier 1 Section 2.3	5.4	
		Tier 1 Section 2.4	5.4.6	
		Tier 1 Section 2.7	5.4.7	
		Tier 1 Section 2.11	6.2.2	
		Tier 1 Section 2.14	6.5.2	
		Tier 1 Section 2.15	6.5.3	
		Tier 2 Section 1.2	6.5.5	
		Tier 2 Appendix 1A	7.1	
		Tier 2 Appendix 1AA	7.3	
		Tier 2 Section 3.2	7.4	
		Tier 2 Section 3.9	7.5	
		Tier 2 Appendix 3I	7.6	
		Tier 2 Appendix 3MA	16.0	
		Tier 2 Section 5.2	16.1	
		Tier 2 Section 5.4		
		Tier 2 Section 6.2		
		Tier 2 Section 6.5		
		Tier 2 Section 6.6		
		Tier 2 Section 7.1		
		Tier 2 Section 7.3		
		Tier 2 Section 7.4		
		Tier 2 Section 7.5		
		Tier 2 Section 7.6		
		Tier 2 Section 9.2		
		Tier 2 Section 9.4		
		Tier 2 Appendix 9A		
		Tier 2 Section 14.2		
		Tier 2 Appendix 15A		

**Table 1.9S-4 Conformance of Tier 1 and Tier 2\* Departures with the SRP (Continued)**

Departure Number	Subject	Affected COLA Sections	Applicable SRP Sections	Conformance with Applicable SRP/ Justification for Differences
STD DEP T1 2.14-1 (continued)	Hydrogen Recombiner Elimination (continued)	Tier 2 Section 16.3.3.6.1 Tier 2 Section 16.3.3.6.2 Tier 2 Section 16.3.6.3.1 Tier 2 Section 16.3.6.3.2 Tier 2 Section 16.5.0 Tier 2 Section 16B.3.3.6.1 Tier 2 Section 16B.3.3.6.2 Tier 2 Section 16B.3.6.3.1 Tier 2 Section 16B.3.6.3.2 Tier 2 Appendix 18A Tier 2 Appendix 18B Tier 2 Appendix 18F Tier 2 Appendix 18H Tier 2 Appendix 19A		



Table 1.9S-4 Conformance of Tier 1 and Tier 2\* Departures with the SRP (Continued)

Departure Number	Subject	Affected COLA Sections	Applicable SRP Sections	Conformance with Applicable SRP/ Justification for Differences
STD DEP T1 2.15-1	Radwaste Building Substructure Seismic Classification	Tier 1 Section 2.15 Tier 2 Section 2.0 Tier 2 Section 2.4S.13 Tier 2 Section 2.5S.4 Tier 2 Section 3.1 Tier 2 Section 3.2 Tier 2 Section 3.3 Tier 2 Section 3.4 Tier 2 Section 3.7 Tier 2 Section 3.8 Tier 2 Appendix 3C Tier 2 Appendix 3H Tier 2 Section 11.4 Tier 2 Section 12.2 Tier 2 Section 14.3 Tier 2 Section 15.7 Tier 2 Section 19.4 Tier 2 Appendix 19H Tier 2 Section 21.0 Tier 2 Section 21.1	2.0 2.4.13 2.5.4 3.2.1 3.2.2 3.3.1 3.3.2 3.4.1 3.7.1 3.7.2 3.7.3 3.8.3 3.8.4 11.4 12.2 14.3 15.7.3 15.7.4 15.7.5 19.0	Conforms with applicable SRP sections
STD DEP T1 2.15-2	RBSRDG HVAC	Tier 1 Section 2.15 Tier 2 Section 9.4	9.4.1 9.4.3 9.4.4	Conforms with applicable SRP sections

Table 1.9S-4 Conformance of Tier 1 and Tier 2\* Departures with the SRP (Continued)

Departure Number	Subject	Affected COLA Sections	Applicable SRP Sections	Conformance with Applicable SRP/ Justification for Differences
STD DEP T1 3.4-1	Safety-Related I&C Architecture	Tier 1 Section 2.2 Tier 1 Section 2.7 Tier 1 Section 3.4 Tier 2 Section 1.2 Tier 2 Section 3.2 Tier 2 Section 6.2 Tier 2 Section 7.1 Tier 2 Section 7.2 Tier 2 Section 7.3 Tier 2 Section 7.4 Tier 2 Section 7.6 Tier 2 Section 7.7 Tier 2 Section 7.9 Tier 2 Section 10.3 Tier 2 Appendix 7A Tier 2 Appendix 7C Tier 2 Section 10.1 Tier 2 Section 10.4	3.2.1 3.2.2 6.2.4 App 7.0-A 7.1 7.2 7.3 7.4 7.6 7.7 7.9 10.3 10.4.5 10.4.7 11.5 12.3-12.4	Conforms with applicable SRP sections

Table 1.9S-4 Conformance of Tier 1 and Tier 2\* Departures with the SRP (Continued)

Departure Number	Subject	Affected COLA Sections	Applicable SRP Sections	Conformance with Applicable SRP/ Justification for Differences
STD DEP T1 3.4-1 (Continued)	Safety-Related I&C Architecture (continued)	Tier 2 Section 11.5	14.2	
		Tier 2 Section 12.3	15.8	
		Tier 2 Section 14.2	16.0	
		Tier 2 Section 15.0	18.0	
		Tier 2 Section 15.1S	19.0	
		Tier 2 Appendix 15B		
		Tier 2 Appendix 15E		
		Tier 2 Section 16.1.0		
		Tier 2 Section 16.5.0		
		Tier 2 Section 16.3.3.1.4		
		Tier 2 Section 16.3.3.3.1		
		Tier 2 Section 16B.3.3.1.1		
		Tier 2 Section 16B.3.3.1.4		
		Tier 2 Section 16B.3.3.3.1		
		Tier 2 Section 16B.3.3.4.1		
		Tier 2 Section 16B.3.3.5.1		
		Tier 2 Section 16B.3.3.6.1		
		Tier 2 Section 16B.3.3.6.2		
		Tier 2 Section 16B.3.8.4		
		Tier 2 Section 18.4		
		Tier 2 Section 18.6		
		Tier 2 Section 18.8		
		Tier 2 Appendix 18C		
		Tier 2 Appendix 18E		
		Tier 2 Section 19.3		
		Tier 2 Section 19.9		
		Tier 2 Section 19.11		
		Tier 2 Appendix 19K		
		Tier 2 Appendix 19L		
		Tier 2 Appendix 19N		
		Tier 2 Appendix 19Q		

Table 1.9S-4 Conformance of Tier 1 and Tier 2\* Departures with the SRP (Continued)

Departure Number	Subject	Affected COLA Sections	Applicable SRP Sections	Conformance with Applicable SRP/ Justification for Differences
STP DEP T1 5.0-1	Site Parameters	Tier 1 Section 5.0 Tier 2 Section 2.2 Tier 2 Section 3.1 Tier 2 Section 3.4 Tier 2 Appendix 3H Tier 2 Section 9.4 Tier 2 Section 19.3 Tier 2 Section 19.9 Tier 2 Section 19.11 Tier 2 Section 19.13 Tier 2 Appendix 19K Tier 2 Appendix 19Q Tier 2 Appendix 19R	2.0 2.2.1-2.2.2 2.4.1 2.4.2 2.4.3 2.4.4 2.4.10 3.4.1 3.4.2 6.4 6.5.1 9.2.1 9.2.5 9.4.1 9.4.2 9.4.3 9.4.4 9.4.5	Conforms with applicable SRP sections Conforms with FSER 19.1.3.3.4
STD DEP 1.8-1	Codes, Standards, and RGs	Tier 2 Section 1.8 Tier 2 Section 5.2 Tier 2 Appendix 7A	1.8 3.2.1 3.2.2 3.8.1 3.8.3 3.8.4 3.8.5 3.12 5.2.3 5.2.4 5.2.5 5.3.1 5.3.2	Conforms with applicable SRP sections

**Table 1.9S-4 Conformance of Tier 1 and Tier 2\* Departures with the SRP (Continued)**

Departure Number	Subject	Affected COLA Sections	Applicable SRP Sections	Conformance with Applicable SRP/ Justification for Differences
STD DEP 3B-2 (see note below)	Revised Pool Swell Analysis	Tier 2, Appendix 3B	6.2.1.1.C 19.0	Conforms with applicable SRP sections

Note: STD DEP 3B-2 does not impact COLA Tier 1 or Tier 2\*, but does require NRC approval

Table 1.9S-5 COL Applicant Resolution of ABWR DCD Appendix 19B Issues

	Title	Resolution
<b>Generic Issues</b>		
A-1	Water Hammer	Section 19B.2.2
A-36	Control of Heavy Loads near Spent Fuel Pool	Section 19B.2.12
A-47	Safety Implications of Control Systems	Operating procedures and operator training will ensure that the operators can mitigate reactor vessel overfill events that may occur via the condensate booster pumps during reduced pressure operation of the system. Section 19B.2.17
C-1	Assurance of Continuous Long-Term Capability of Hermetic Seals on Instrumentation and Electrical Equipment	19B.2.27
C-17	Interim Acceptance Criteria for Solidification Agents for Radioactive Solid Wastes	Section 19B.2.29; 10 CFR 61
<b>New Generic Issues</b>		
51	Proposed Requirements for Improving the Reliability of Open Cycle Service Water Systems	Implementation of a baseline fouling program issued to licensees in GL 89-13; Section 19B.2.35
75	Generic Implications of ATWS Events at the Salem Nuclear Plant	Sections 13.4S, 13.5, and 19B.2.38
105	Interfacing Systems LOCA at BWRs	No longer listed in NUREG-0933. Therefore, not applicable to future reactor plants.

**Table 1.9S-5 COL Applicant Resolution of ABWR DCD Appendix 19B Issues  
(Continued)**

	<b>Title</b>	<b>Resolution</b>
145	Actions to Reduce Common Cause Failures	No longer listed in NUREG-0933. Therefore, not applicable to future reactor plants.
153	Loss of Essential Service Water in LWRs	No longer listed in NUREG-0933. Therefore, not applicable to future reactor plants.
<b>Issues Resolved with no New Requirements</b>		
A-29	Nuclear Power Plant Design for Reduction of Vulnerability to Industrial Sabotage	No longer listed in NUREG-0933. Therefore, not applicable to future reactor plants.
120	On-Line Testability of Protection Systems	No longer listed in NUREG-0933. Therefore, not applicable to future reactor plants.
151	Reliability of Anticipated Transient without Scram Recirculation Pump Trip in BWRs	No longer listed in NUREG-0933. Therefore, not applicable to future reactor plants.
<b>TMI Issues</b>		
I.A.1.1	Shift Technical Advisor	Section 13.1
I.A.1.2	Shift Supervisor Administrative Duties	Section 13.1
I.A.1.3	Shift Manning	Technical Specifications
I.A.2.1(1)	Qualifications - Experience	Section 13.2
I.A.2.1(2)	Training	Section 13.2
I.A.2.1(3)	Facility Certification of Competence and Fitness of Applicants for Operator and Senior Operator	Section 13.2

**Table 1.9S-5 COL Applicant Resolution of ABWR DCD Appendix 19B Issues  
(Continued)**

	<b>Title</b>	<b>Resolution</b>
I.A.2.3	Administration of Training Programs	Section 13.2
I.A.2.6(1)	Revise Regulatory Guide 1.8	NRC action. Not applicable.
I.A.3.1	Revise Scope of Criteria for Licensing Examinations	NRC action. Not applicable.
I.A.4.1(2)	Interim Changes in Training Simulators	STP 3 & 4 will conform with RG 1.149 and will have an onsite simulator
I.C.1(1)	Small Break LOCAs	Section 13.5
I.C.1(2)	Inadequate Core Cooling	Section 13.5
I.C.2	Shift and Relief Turnover Procedures	Section 13.5
I.C.3	Shift Supervisor Responsibilities	Section 13.1; Conduct of Operations
I.C.4	Control Room Access	Conduct of Operations Procedure
I.C.6	Procedures for Verification of Correct Performance of Operating Activities	Conduct of Operations Procedure
I.C.7	NSSS Vendor Review of Procedures	Applicable to <u>W</u> and CE only.
I.C.8	Pilot – Monitoring of Selected Emergency Procedures for Near-Term Operating License Applicants	Historical issue. No longer applicable.
II.B.1	Reactor Coolant System Vents	Sections 1A.2.5 and 13.5
II.B.4	Training for Mitigating Core Damage	Section 13.2
II.E.6.1	Test Adequacy Study	Section 19B.2.68



**Table 1.9S-5 COL Applicant Resolution of ABWR DCD Appendix 19B Issues  
(Continued)**

	<b>Title</b>	<b>Resolution</b>
II.J.4.1	Revise Deficiency Reporting Requirements	NRC action. Not applicable.
II.K.3(15)	Modify Break Detection Logic to Prevent Spurious Isolation of HPCI and RCIC Systems	Sections 1A.2.23 and 14.2
III.A.1.1(1)	Implement Action Plan Requirements for Promptly Improving Licensee Emergency Preparedness	NRC action. Not applicable.
III.A.2.1(1)	Publish Proposed Amendments to the Rules	NRC action. Not applicable.
III.A.2.1(2)	Conduct Public Regional Meetings	No longer listed in NUREG-0933. Therefore, not applicable to future reactor plants.
III.A.2.1(3)	Prepare Final Commission Paper Recommending Adoption of Rules	No longer listed in NUREG-0933. Therefore, not applicable to future reactor plants.
III.A.2.1(4)	Revise Inspection Program to Cover Upgraded Requirements	NRC action. Not applicable.
III.A.2.2	Development of Guidance and Criteria	NRC action. Not applicable.
III.A.3.3(1)	Install Direct Dedicated Telephone Lines	STP 3 & 4 will use direct lines installed by STP 1 & 2.
III.A.3.3(2)	Obtain Dedicated, Short-Range Radio Communication Systems	NRC action. Not applicable.

**Table 1.9S-6 COL Applicant Resolution of Generic Communications Issues**

<b>No.</b>	<b>Title</b>	<b>Comment</b>
<b>Generic Letters</b>		
80-110	Periodic Updating of Final Safety Analysis Reports (FSARs)	STP 3 & 4 will comply with 10 CFR 50.71(e)
81-04	Emergency Procedures and Training for Station Blackout Events	Refer to Sections 13.2 and 13.5.
81-38	Storage of Low-Level Radioactive Wastes at Power Reactor Sites	No longer applicable.
82-21	Technical Specifications for Fire Protection Audits	STP 3 & 4 will comply with 10 CFR 50 App R.
82-39	Problems with the Submittals of 10CFR73.21 Safeguards Information Licensing Review	No longer applicable.
83-05	Safety Evaluation of "Emergency Procedure Guidelines," Rev 2, NEDO-24932, June 1982	No longer applicable.
83-07	Nuclear Waste Policy Act of 1982	STP 3 & 4 will negotiate a new contract with DOE for Spent Fuel prior to obtaining a COL.
83-33	NRC Position on Certain Requirements of Appendix R to 10 CFR 50	STP 3 & 4 will comply with 10 CFR 50 App R.
87-06	Periodic Verification of Leak Tight Integrity of Pressure Isolation Valves	Periodic testing of pressure isolation valves is assured by the ABWR DCD and the ISI and IST programs.
88-18	Plant Record Storage on Optical Disks	Refer to Section 17.5S; Quality Assurance Program Description, Section 17.2

**Table 1.9S-6 COL Applicant Resolution of Generic Communications Issues  
(Continued)**

No.	Title	Comment
89-01	Implementation of programmatic Controls for Radiological Effluent Technical Specifications in the Administrative Controls Section of the Technical Specifications and the Relocation of Procedural Details of RETS to the Offsite Dose Calculation Manual or the Process Control Program	Refer to Section 13.4S.
89-02	Actions to Improve the Detection of Counterfeit and Fraudulently Marketed Products	Refer to Section 17.5S and the Quality Assurance Program Description
89-04	Guidance on Developing Acceptable In-service Testing Program	Refer to Section 13.4S.
89-10	Safety-Related Motor-Operated Valve Testing and Surveillance	Refer to Section 13.4S.
89-13	Service Water System Problems Affecting Safety-Related Equipment	Refer to section 9.2.15
89-15	Emergency Response Data System	Refer to the Security Plan.
91-03	Reporting of Safeguards Events	Refer to the Security Plan.
91-10	Explosive Searches at Protected Area Portals	Refer to the Security Plan.
91-16	Licensed Operators' and Other Nuclear Facility Personnel Fitness for Duty	Refer to Section 13.7.
<b>IE Bulletins</b>		
80-05	Vacuum Condition Resulting in Damage to Chemical and Volume Control System (CVCS) Holdup Tanks	Not applicable to BWRs.

**Table 1.9S-6 COL Applicant Resolution of Generic Communications Issues  
(Continued)**

<b>No.</b>	<b>Title</b>	<b>Comment</b>
80-08	Containment Lines Penetration Welds	The primary piping containment penetration flued head-to-outer sleeve-welds will be radiographed in accordance with ASME B&PV Code requirements.
80-10	Non-Radioactive System – Potential for Unmonitored Release	Not applicable. Information only for CP plants.
80-12	Decay Heat Removal System Operability	Not applicable. For PWRs only.
80-21	Valve Yokes Supplied by Mole	Historical issue. No longer applicable.
80-22	Automatic Industries, Model 200-500-008 Sealed Source Connectors	Historical issue. No longer applicable.
81-02, Supp 1	Failure of Gate Type Valves to Close Against Differential Pressure	Historical issue. No longer applicable.
81-03	Flow Blockage of Cooling Water to Safety System (bu Corbicula SP. [Asiatic Clam] and Mytilus SP. [Mussel])	STP 3 & 4 will have a program similar to the program used by STP 1 & 2
82-04	Deficiencies in Primary Containment Electrical Penetration Assemblies	Procurement QA program will preclude this issue in the future.
83-06	Non-Conforming Materials Supplied by Tube-Line Corp.	Procurement QA program will preclude this issue in the future.
85-03, Supp 1	Motor-Operated Valve Common Mode Failure During Plant Transients Due to Improper Switch Settings	Superseded by GL 89-10. Refer to Section 13.4S.
87-02, Supp 1, Supp 2	Fastener Testing to Determine Conformance with Applicable Material Specifications	Refer to Section 3.13S.