

# Mark I and Mark II BWRs Containment Venting Systems

## Guidance for Order EA-13-109

### March 26, 2014



# Agenda

- Introductions
- Opening remarks
- Schedules
- NRC presentation
- Industry presentation
- Public questions and comments
- Toll free number: **888-390-5220** and pass code: **17017**



## Schedule

- ISG endorsing NEI 13-02 – November 15, 2013
- Public meetings – Dec. 5, 2013, Jan. 15, Jan. 29, February 19, and March 5, 2014
- Overall Integrated plan (OIP) – June 30, 2014



# Review Process

- OIP submittals – June 30, 2014
- Pilot Plants OIP submittals-March/April 2014
- NRC staff feedback – March/April 2014
- NRC staff review and interim staff evaluations (ISEs) – December, 2014



# NRC Presentation



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# Staff Comments – EA-13-109

Available in ADAMS  
Accession No. ML14083a443



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# Staff Comments – NMP 2

## 1. Applicable EA-12-049 Assumptions

Assumption 049-8 “All activities associated with EA-12-049 (FLEX) that are not specific to implementation of the HCVS (i.e., HCVS valves, instruments and motive force) can be credited as having been accomplished.”

The assumption is not clear in the context of its need or its intended usage. The activities associated with EA-12-049 that are not specific to the implementation of the HCVS have no bearing on the HCVS implementation, expect when credit is taken for such actions after 24 hours, in which case the actions should be shown to be accomplishable under severe accident conditions. If there are any actions that are relied upon, beyond what were described in the OIP, they should be spelled out.

Assumption 109-10 Permanent modifications installed per EA-12-049 are assumed implemented and may be credited for use in Order EA-13-109 response.

What are permanent modifications are being referenced here? In order to take credit, the OIP needs to list the specific modifications, for staff to review and concur.





# Staff Comments – NMP 2

2. Reactor Building Track Bay – Is this a qualified seismic structure? Include a discussion in the OIP.
3. Vent Path and Discharge – Include a sketch (simplified, non-dimensional) to depict the vent routing and discharge.
4. General Comment: Provide open items at the end of each discussion, number them consecutively and capture them all in one of the Attachments at the end, similar to what was done in Hatch OIP template.
5. There is no condensation drain valve in NMP-2 vent line as in Hatch. Why is it not necessary?





# Staff Comments – Hatch I&C

1. Similar to the sketches on pages 7, and 8 would it be possible to show a labeled sketch or marked-up plant drawing of the plan view with the HCVS system one line and instrumentation?
2. On page 13 will there be further information provided than the italicized version from the template? See under the last 4 titled topics.
3. Follow up question: how does this page interact with the stated instrumentation requirements on page 17?
4. The 2<sup>nd</sup> last paragraph on page 17 states HCVS instrumentation accuracy qualifications need only be “gross values”, and yet the discussion at our previous meeting was the sites would select instruments of an easy procurement plant level quality. What would be a way to state the level of accuracy, which is best for the transmitter’s function and reflects the discussion?
5. On page 18 will the criteria for intrinsic safe barriers be added to the I&C table and



# Staff Comments – Hatch I&C

6. Is this a cycle time typo between pages 15,(1), which says “twelve” and page 24,(i), which states “13?”
7. The first sentence on the last paragraph of page 20 needs some clarity, and possibly answer what the instrument requires after a potential seismic event. Can this sentence be improved?
8. What instrument details will be provided for the “List instrumentation credited for the HCVS Actions?”
9. Will the all of the HCVS instrumentation component identifier’s be included on page 41, Sketch 2.
10. Follow up: would the I&C functional loop design description of the design be provided separately from the operation of the HCVS, ERGO: Table 2-1 “HCVS Remote Manual Actions.”



# Staff Comments – NMP 2 I&C

4. (Repeat) The 2<sup>nd</sup> last paragraph on page 13 states HCVS instrumentation accuracy qualifications need only be “gross values”, and yet the discussion at our previous meeting was the sites would select instruments of an easy procurement plant level quality. What would be a way to state the level of accuracy, which is best for the transmitter’s function and reflects the discussion?
  - 4.1 (Addition) Question – On page 14 the top line states that only one of the three methods below will be applied. Why the break down like this? We need to define the reliable / rugged approach for better clarity. What is stated on page 15 does say
  - 4.2 (Addition) Comment – Nice break down on the instrumentation venues and the approach.
5. On page 14 will the criteria for intrinsic safe barriers be added to the I&C table and show manufacture with specifications?



# OIP Template – NMP 2 I&C

7. The first sentence on the last paragraph of page 15 needs some clarity, and possibly answer what the instrument requires after a potential seismic event. Can this sentence be improved
8. Page 19, what instrument details will be provided for the “List instrumentation credited for the HCVS Actions?”
  - 8.1 (Addition) Comment – Great idea with the additional I&C indication: HCVS electrical power supply available.
9. Will the all of the HCVS instrumentation component identifier’s be included on page 37, Sketch 2. e.g. - Supporting I&C instruments that are considered not part of the HCVS order purview?
10. Follow up: would the I&C functional loop design description of the design be provided separately from the operation of the HCVS, ERGO: Table 2-1 “HCVS Remote Manual Actions.”



# Industry Presentation



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# Questions & Discussion



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