

Draft for Comment



U.S. NUCLEAR REGULATORY COMMISSION DESIGN-SPECIFIC REVIEW STANDARD FOR NuScale SMR DESIGN

10.4.3 TURBINE GLAND SEALING SYSTEM

REVIEW RESPONSIBILITIES

Primary - Organization responsible for the review of power conversion systems

Secondary - None

I. AREAS OF REVIEW

The turbine gland sealing system (TGS) is designed to provide a source of sealing steam to the annulus space where the turbine and large steam valve shafts penetrate their casings to prevent air leakage into and steam leakage out of these components. This includes the equipment to collect and route the systems effluents to the appropriate destination. Review of the TGS is focused on the system features incorporated to monitor and control releases of radioactive materials in effluents.

The specific areas of review are as follows:

1. The design, design objectives, method of operation, and factors that influence gaseous radioactive material handling, e.g., source of sealing steam, system interfaces, and potential leakage paths. The review includes flow diagrams and/or piping and instrumentation diagrams (P&IDs).
2. The means provided to detect and measure radioactive leakage into or out of the system; and to preclude accidental releases of radioactive materials to the environment in amounts excess of established limits.
3. Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC). For design certification (DC) and combined license (COL) reviews, the staff reviews the applicant's proposed ITAAC associated with the structures, systems, and components (SSCs) related to this Design Specific Review Standard (DSRS) section in accordance with Standard Review Plan (SRP) Section 14.3, "Inspections, Tests, Analyses, and Acceptance Criteria." The staff recognizes that the review of ITAAC cannot be completed until after the rest of this portion of the application has been reviewed against acceptance criteria contained in this DSRS section. Furthermore, the staff reviews the ITAAC to ensure that all SSCs in this area of review are identified and addressed as appropriate in accordance with DSRS Sections 14.2 and 14.3.7.
4. COL Action Items and Certification Requirements and Restrictions. For a DC application, the review will also address COL action items and requirements and restrictions (e.g., interface requirements and site parameters).

For a COL application referencing a DC, a COL applicant must address COL action items (referred to as COL license information in certain DCs) included in the referenced

DC. Additionally, a COL applicant must address requirements and restrictions (e.g., interface requirements and site parameters) included in the referenced DC.

Review Interfaces

Other DSRS/SRP sections interface with this section as follows:

1. Review of the acceptability of the seismic and quality group classifications is performed under SRP Sections 3.2.1 and 3.2.2.
2. Review of the potential effects of high energy pipe breaks within this system on safety-related equipment is performed under SRP Section 3.6.1.
3. Review of the provisions for controlling the release of radioactive materials from the gland seal condenser vent is performed under DSRS Section 11.3.
4. Review of the provisions for process and effluent radiological monitoring of the TGS is performed under DSRS Section 11.5.
5. Review of the systems quality assurance programs is performed under SRP Chapter 17.
6. Review of the probabilistic risk assessment performed under SRP Chapter 19.
7. Review of initial plant test, and system inspection, tests, analyses, and acceptance criteria under DSRS Section 14.2 and SRP Section 14.3.

For those areas of review identified above as part of the primary review responsibility of other staff, the acceptance criteria necessary for the review and their methods of application are contained in the referenced DSRS/SRP sections of the corresponding primary reviewers.

II. ACCEPTANCE CRITERIA

Requirements

Acceptance criteria are based on meeting the relevant requirements of the following Commission regulations:

1. General Design Criterion (GDC) 60, Control of Releases of Radioactive Materials to the Environment.
2. GDC 64, Monitoring Radioactivity Releases.
3. 10 CFR 20.1406 as it relates to the minimization of, to the extent practicable, of contamination of the facility and the environment, designs and procedures to facilitate eventual decommissioning, and to minimize, to the extent practicable, the generation of radioactive waste.
4. 10 CFR 52.47(b)(1), which requires that a DC application contain the proposed inspections, tests, analyses, and acceptance criteria (ITAAC) that are necessary and sufficient to provide reasonable assurance that, if the inspections, tests, and analyses are performed and the acceptance criteria met, a facility that incorporates the design

certification has been constructed and will be operated in conformity with the design certification, the provisions of the Atomic Energy Act, and the NRC's rules and regulations.

5. 10 CFR 52.80(a), which requires that a COL application contain the proposed inspections, tests, and analyses, including those applicable to emergency planning, that the licensee shall perform, and the acceptance criteria that are necessary and sufficient to provide reasonable assurance that, if the inspections, tests, and analyses are performed and the acceptance criteria met, the facility has been constructed and will operate in conformity with the combined license, the provisions of the Atomic Energy Act, and the NRC's rules and regulations.

DSRS Acceptance Criteria

Specific DSRS acceptance criteria acceptable to meet the relevant requirements of the NRC's regulations identified above are set forth below. The DSRS is not a substitute for the NRC's regulations, and compliance with it is not required. As an alternative, and as described in more detail below, an applicant may identify the differences between a DSRS section and the design features (DC and COL applications only), analytical techniques, and procedural measures proposed in an application and discuss how the proposed alternative provides an acceptable method of complying with the NRC regulations that underlie the DSRS acceptance criteria.

1. The applicant demonstrates how it meets the requirements of GDC 60 as they relate to the TGS being designed to provide for the collection and condensation of sealing steam and the venting and treatment of noncondensables. Additional acceptance criteria and review procedures are contained in the DSRS sections referenced in the "review interfaces" section of this DSRS.
2. The applicant demonstrates how it meets the requirements of GDC 64 as they relate to the TGS design providing means to monitor radioactive effluents in potential discharge pathways to the environment (i.e. pump discharge, ventilation, etc).
3. The applicant demonstrates how it meets the requirements of 10 CFR 20.1406 as they relate to the interconnections between the TGS and other plant systems being designed to preclude TGS contamination of connecting systems, or the contamination of TGS by connections with interfacing radioactive systems (i.e., gaseous radwaste system).

Technical Rationale

The technical rationale for application of these acceptance criteria to the areas of review addressed by this DSRS section is discussed in the following paragraphs:

1. GDC 60 and GDC 64 require that the nuclear power unit design include means to control and monitor suitably the release of radioactive materials in gaseous and liquid effluents produced during normal operation, including anticipated operational occurrences.

GDC 60 is applicable to the design of the TGS because one of the systems functions is to prevent the release of radioactive materials to the environment. The design of the TGS is acceptable if the integrated design of the system meets the requirements of GDC 60 as related to failures in the design of the system which do not result in excessive releases of radioactivity to the environment.

GDC 64 requires monitoring of releases of radioactive materials to the environment during normal operation, including anticipated operational occurrences. The design of the TGS is acceptable if the design ensures proper routing, venting, and monitoring for radioactivity, of the steam and noncondensables from the TGS prior to their release to the environment, so as to assure that normal releases of effluents containing radioactive materials will be controlled to within acceptable limits

Further, the review under this DSRS section, in conjunction with review under DSRS Section 11.3 and 11.5 verifies that the design of the TGS includes acceptable means to monitor and control the release of radioactive materials in gaseous effluents.

2. The requirements of 10 CFR 20.1406 are met when the interconnections between the TGS and other plant systems are designed to preclude TGS contamination of connecting systems, or the contamination of TGS by connections with interfacing radioactive systems (i.e. gaseous radwaste system). Meeting this criterion provides a level of assurance that the TGS is designed with proper controls over normal releases of radioactive effluents to the environment.

III. REVIEW PROCEDURES

These review procedures are based on the identified DSRS acceptance criteria. For deviations from acceptance criteria, the staff should review the applicant's evaluation of how the proposed alternatives provide an acceptable method of complying with the relevant NRC requirements identified in Subsection II.

Upon request from the reviewer, the interface reviewers will provide input for the areas of review stated in subsection I. The reviewer obtains and uses such input as required to ensure that this review procedure is complete.

The application as it relates to the TGS is reviewed to verify that:

1. Selected Programs and Guidance - In accordance with the guidance in NUREG-0800, "Introduction - Part 2: Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: Integral Pressurized Water Reactor Edition" (NUREG-0800 Intro Part 2) as applied to this DSRS Section, the staff will review the information proposed by the applicant to evaluate whether it meets the acceptance criteria described in Subsection II of this DSRS. As noted in NUREG-0800 Intro Part 2, the NRC requirements that must be met by an SSC do not change under the SMR framework. Using the graded approach described in NUREG-0800 Intro Part 2, the NRC staff may determine that, for certain structures, systems, and components (SSCs), the applicant's basis for compliance with other selected NRC requirements may help demonstrate satisfaction of the applicable acceptance criteria for that SSC in lieu of detailed independent analyses. The design-basis capabilities of specific SSCs would be verified where applicable as part of completion of the applicable ITAAC. The use of the selected programs to augment or replace traditional review procedures is described in Figure 1 of NUREG-0800, Introduction - Part 2. Examples of such programs that may be relevant to the graded approach for these SSCs include:
 - 10 CFR Part 50, Appendix A, General Design Criteria (GDC), Overall Requirements, Criteria 1 through 5
 - 10 CFR Part 50, Appendix B, Quality Assurance (QA) Program
 - 10 CFR 50.49, Environmental Qualification of Electrical Equipment (EQ) Program

- 10 CFR 50.55a, Code Design, Inservice Inspection and Inservice Testing (ISI/IST) Programs
- 10 CFR 50.65, Maintenance Rule requirements
- Reliability Assurance Program (RAP)
- 10 CFR 50.36, Technical Specifications
- Availability Controls for SSCs Subject to Regulatory Treatment of Non-Safety Systems (RTNSS)
- Initial Test Program (ITP)
- Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC)

This list of examples is not intended to be all-inclusive. It is the responsibility of the technical reviewers to determine whether the information in the application, including the degree to which the applicant seeks to rely on such selected programs and guidance, demonstrates that all acceptance criteria have been met to support the safety finding for a particular SSC.

2. In accordance with 10 CFR 52.47(a)(8),(21), and (22), and 10 CFR 52.79(a)(17), (20) and (37), for design certification or combined license applications submitted under Part 52, the applicant is required to (1) address the proposed technical resolution of unresolved safety issues and medium- and high-priority generic safety issues which are identified in the version of NUREG-0933 current on the date up to 6 months before the docket date of the application and which are technically relevant to the design; (2) demonstrate how the operating experience insights have been incorporated into the plant design; and, (3) provide information necessary to demonstrate compliance with any technically relevant portions of the Three Mile Island requirements set forth in 10 CFR 50.34(f), except paragraphs (f)(1)(xii), (f)(2)(ix), and (f)(3)(v) for a DC application, and except paragraphs (f)(1)(xii), (f)(2)(ix), (f)(2)(xxv), and (f)(3)(v) for a COL application. These cross-cutting review areas should be addressed by the reviewer for each technical subsection and relevant conclusions documented in the corresponding safety evaluation report (SER) section.
3. The schematics and/or piping and instrument diagrams (P&IDs) reflect the source of sealing steam and the disposition of steam and noncondensables vented from the gland seal.
4. In conjunction with DSRS Section 11.3, and 11.5, the design provides for monitoring of releases of steam and non condensables from the TGS.
5. The TGS is designed such that interconnections between the TGS and other plant systems are designed to preclude TGS contamination of connecting systems, or the contamination of TGS by connections with interfacing radioactive systems (i.e. gaseous radwaste system).

For review of a DC application, the reviewer should follow the above procedures to verify that the design, including requirements and restrictions (e.g., interface requirements and site parameters), set forth in the final safety analysis report (FSAR) meets the acceptance criteria. DCs have referred to the FSAR as the design control document (DCD). The reviewer should also consider the appropriateness of identified COL action items. The reviewer may identify additional COL action items; however, to ensure these COL action items are addressed during a COL application, they should be added to the DC FSAR.

For review of a COL application, the scope of the review is dependent on whether the COL applicant references a DC, an early site permit (ESP) or other NRC approvals (e.g., manufacturing license, site suitability report or topical report).

For review of both DC and COL applications, SRP Section 14.3 should be followed for the review of ITAAC. The review of ITAAC cannot be completed until after the completion of this section.

IV. EVALUATION FINDINGS

The reviewer verifies that the applicant has provided sufficient information and that the staff's technical review and analysis support conclusions of the following type to be included in the staff's evaluation report. The reviewer also states the bases for those conclusions.

The TGS includes the equipment and instruments to provide a source of sealing steam to the annulus space where the turbine and large steam valve shafts penetrate their casings. The scope of our review included the source of sealing steam and the provisions incorporated to control releases of radioactive material in effluents. Programmatic requirements, including ITAAC and initial plant testing provide assurance that the TGS will be designed, installed, and tested as described in the DCD or FSAR.

The staff concludes that the TGS design is acceptable in that the applicant has met the requirements of GDC 60 and GDC 64 with respect to the design features in place to control and monitor releases of radioactive materials to the environment. The staff also concludes that the TGS design meets the requirements of 10CFR20.1406 in that it is designed to preclude TGS contamination of connecting systems, and thus minimize contamination of the associated systems, facility, and the environment.

For DC and COL reviews, the findings will also summarize the staff's evaluation of requirements and restrictions (e.g., interface requirements and site parameters) and COL action items relevant to this DSRS section.

In addition, to the extent that the review is not discussed in other SER sections, the findings will summarize the staff's evaluation of the ITAAC, including design acceptance criteria, as applicable.

V. IMPLEMENTATION

The regulations in 10 CFR 52.17(a)(1)(xii), 10 CFR 52.47(a)(9), and 10 CFR 52.79(a)(41) establish requirements for applications for ESPs, DCs, and COLs, respectively. These regulations require the application to include an evaluation of the site (ESP), standard plant design (DC), or facility (COL) against the Standard Review Plan (SRP) revision in effect six months before the docket date of the application. While the SRP provides generic guidance, the staff developed the SRP guidance based on the staff's experience in reviewing applications for construction permits and operating licenses for large light-water nuclear power reactors. The proposed small modular reactor (SMR) designs, however, differ significantly from large light-water nuclear reactor power plant designs.

In view of the differences between the designs of SMRs and the designs of large light-water power reactors, the Commission issued SRM- COMGBJ-10-0004/COMGEA-10-0001, "Use of Risk Insights to Enhance the Safety Focus of Small Modular Reactor Reviews," dated August 31, 2010 (ML102510405) (SRM). In the SRM, the Commission directed the staff to develop risk-informed licensing review plans for each of the SMR design reviews, including plans for the

associated pre-application activities. Accordingly, the staff has developed the content of the DSRS as an alternative method for the evaluation of a NuScale-specific application submitted pursuant to 10 CFR Part 52, and the staff has determined that each application may address the DSRS in lieu of addressing the SRP, with specified exceptions. These exceptions include particular review areas in which the DSRS directs reviewers to consult the SRP and others in which the SRP is used for the review. If an applicant chooses to address the DSRS, the application should identify and describe all differences between the design features (DC and COL applications only), analytical techniques, and procedural measures proposed in an application and the guidance of the applicable DSRS section (or SRP section as specified in the DSRS), and discuss how the proposed alternative provides an acceptable method of complying with the regulations that underlie the DSRS acceptance criteria.

The staff has accepted the content of the DSRS as an alternative method for evaluating whether an application complies with NRC regulations for NuScale SMR applications, provided that the application does not deviate significantly from the design and siting assumptions made by the NRC staff while preparing the DSRS. If the design or siting assumptions in a NuScale application deviate significantly from the design and siting assumptions the staff used in preparing the DSRS, the staff will use the more general guidance in the SRP as specified in 10 CFR 52.17(a)(1)(xii), 10 CFR 52.47(a)(9), or 10 CFR 52.79(a)(41), depending on the type of application. Alternatively, the staff may supplement the DSRS section by adding appropriate criteria in order to address new design or siting assumptions.

VI. REFERENCES

1. 10 CFR Part 20, "Standards for Protection Against Radiation."
2. 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities."
3. 10 CFR Part 52, "Early Site Permits; Standard Design Certifications; and Combined Licenses for Nuclear Power Plants."
4. GDC 61, "Fuel Storage and Handling and Radioactivity Control."
5. GDC 19, "Control Room."
6. GDC 4, "Environmental and Dynamic Effects Design Bases."
7. RG 1.7, "Control of Combustible Gas Concentrations in Containment Following a Loss-of-Coolant Accident."
8. RG 1.112, "Calculations of Releases of Radioactive Materials in Gaseous and Liquid Effluents from Light-Water-Cooled Power Reactors."
9. RG 1.183, "Alternative Radiological Source Terms for Evaluating Design Basis Accidents at Nuclear Power Reactors."
10. ANSI/ANS Standard 18.1-1999, "Source Term Specification," American National Standards Institute/American Nuclear Society."
11. NUREG-0737, "Clarification of TMI Action Plan Requirements."

12. 40 CFR Part 190, "Environmental Radiation Protection Standards For Nuclear Power Operations."
13. RG 1.89, "Environmental Qualification of Certain Electric Equipment Important to Safety for Nuclear Power Plants."
14. RG 1.143, "Design Guidance for Radioactive Waste Management Systems, Structures, and Components Installed in Light-Water-Cooled Nuclear Power Plants."
15. RG 1.26, "Quality Group Classifications and Standards for Water-, Steam-, and Radioactive-Waste-Containing Components of Nuclear Power Plants."
16. RG 1.29, "Seismic Design Classification."
17. RG 1.117, "Tornado Design Classification."
18. RG 1.206, "Combined License Applications for Nuclear Power Plants (LWR Edition)."
19. EPRI, "Pressurized Water Reactor Primary Water Chemistry Guidelines."
20. EPRI, "Pressurized Water Reactor Primary Water Zinc Application Guidelines."
21. EPRI, "Advanced Light Water Reactor Utility Requirements Document, Volume III, ALWR Passive Plant."
22. NUREG-1242, "NRC Review of Electric Power Research Institute's Advanced Light Water Reactor Utility Requirements Document, Passive Plant Designs" Volume 3, Part 1 and Volume 3, Part 2 (ADAMS Accession Nos. ML070600372 and ML070600373).
23. EPRI, "Cobalt Reduction Guidelines."
24. RG 8.8, "Information Relevant to Assuring that Occupational Radiation Exposures at Nuclear Power Stations Will Be as Low as is Reasonably Achievable."