Enclosure 2

MFN 15-044

GEH Response to Item #17

ABWR DCD DRAFT Revision 6 Markups

IMPORTANT NOTICE REGARDING CONTENTS OF THIS DOCUMENT
Please Read Carefully

Table 1.8-21 Industrial Codes and Standards* Applicable to ABWR (Continued)

Code or Standard Number	Year	Title
[*H-46855B*	*1979*	*Human Engineering Requirements for Military Systems, Equipment and Facilities*][5]
[*HDBK-217*	*Latest Edition*	*Reliability Prediction of Electronic Equipment*][3]
[*HDBK-251*	*Latest Edition*	*Reliability/Design: Thermal Applications*][3]
[*HDBK-759A*	*1981*	*Human Factors Engineering Design for Army Material*][5]
STD-282	1956	Filter Units, Protective Clothing Gas-Mask Components and Related Products: Performance-Test Methods
[*STD-461C*	*1987*	*Electromagnetic Emission and Susceptibility Requirements for the Control of Electromagnetic Interference*][3][4]
[*STD-462*	*1967*	*Measurement of Electromagnetic Interference Characteristics*][3][4]
[*STD-1472D*	*1989*	*Human Engineering Design Criteria for Military Systems, Equipment and Facilities*][5]
[*STD-1478*	*1991*	*Task Performance Analysis*][5]
Others		
ASCE 7	1988	Minimum Design Loads for Buildings and Other Structures
ERDA 76-21	1976	Testing of Ventilation Systems, Section 9 of Industrial Ventilation Systems
[*IEC 801-2*	*1991*	*Electronic Capability for Industrial-Process Measurement and Control Equipment*][3]
[*IEC 880*	*1986*	*Software for Computers in the Safety Systems of Nuclear Power* [3][4]
[*IEC 964*		ntral
[*ISO 7498*	*1984*	*Open Systems Interconnection-Basic Refence Model, as the Data Link Layer and Physical Layer*][3]
OSHA 1910.179	1990	Overhead and Gantry Cranes
NEI 12-02	2012	Industry Guidance for Compliance with NRC Order EA-12-051, "To Modify Licenses with Regard to Reliable Spent Fuel Pool
TEM		
UL-4		
UL-489	1991	Molded-Case Circuit Breakers and Circuit Breaker Enclosures
UL-845	1988	Standard for Safety Motor Control Centers - Low Voltage Circuit Breakers
--	--	Crane Manufacturers Association of America, Specification No. 70

NEI 91-04 R1	1994	Severe Accident Issue Closure Guidelines
NEI 06-12 R2	2006	B.5.b Phase 2 & 3 Submittal Guideline

NEI 12-06 R0, NEI 14-01 R0	2012 2014	Diverse and Flexible Coping Strategies (FLEX) Implementation Guide Emergency Response Procedures and Guidelines for Beyond Design Basis Events and Severe Accidents

13.5 Plant Procedures

13.5.1 Administrative Procedures

Out of ABWR Standard Plant scope.

13.5.2 Operating and Maintenance Procedures

Out of ABWR Standard Plant scope.

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- The procedure development will integrate the Emergency Operating Procedures (EOPs), Severe Accident Management Guidelines (SAMGs), FLEX Support Guidelines (FSGs) and Extensive Damage Mitigation Guidelines (EDMGs) by using the following guidance:
  - Industry (BWROG) guidance as endorsed by applicable NRC regulatory guides consistent with the Task Force recommendation as described in SECY-11-0124 (Reference 13.5-9).
  - Plant Specific Technical Guidelines (PSTGs), EOPs and SAMGs development activities using as inputs the standard ABWR guidelines (DCD) and generic industry guidance per NEI 91-04, Revision 1, Severe Accident Issue Closure Guidelines (Reference 13.5-10), which includes the industry commitment to incorporate severe accident strategies into the overall accident management program.
  - EDMGs development as described in NEI 06-12, Reference 13.5-11.
  - FSGs development as described in NEI 12-06, Reference 13.5-12.
  - The EOPs, EDMGs, FSGs and SAMGs will be integrated in a cohesive, effective and useable manner as described in NEI 14-01, Emergency Response Procedures and Guidelines for Beyond Design Basis Events and Severe Accidents (Reference 13.5-13).

13.5.3.2 Emergency Procedures Development

In addition to the above, for Emergency Procedures development, the plan shall establish:

- That a writer's guide shall be developed and implemented which defines the process for developing emergency procedures. The writer's guide shall contain objective criteria which will require that the emergency procedures developed are consistent in organization, style, content and usage of terms.

- The form and content of the documentation describing the emergency procedure development activity results which includes, but is not limited to: (1) the objectives of the emergency procedure development process, (2) the methods employed during emergency procedure development, (3) deviations from generic technical guidelines approved by the NRC and (4) discussion of any design change recommendations and/or negative implications that the current design may have on safe operation as a result of emergency procedures development plan implementation.

13.5.4 References

In addition to the sources cited previously, accepted methods and criteria for development of plant procedures are embodied in the following documents.

13.5-1 Gilmore, et al, "User-Computer Interface in Process Control: A Human Factors Engineering Handbook", Academic Press, San Diego, Ca, 1989

13.5-2 IEC 964, "Design for Control Rooms of Nuclear Power Plants", Bureau Central de la Commission Electrotechni

13.5-3 MIL-H-46855B, "Human Er Equipment and Facilities", D

13.5-4 MIL-STD-1472D, "Human F Equipment and Facilities", D

13.5-5 NUREG-0899, "Guidelines f Procedures", USNRC, 1982

13.5-6 NUREG-1358, "Lessons Lea Emergency Operating Proce

13.5-7 NUREG-1358, Supplement 1, "Lessons Learned From the Special Inspection Program for Emergency Operating Procedures", USNRC, 1992

13.5-8 NUREG/CR-5228, "Techniques for Preparing Flowchart Format Emergency Operating Procedures" (Vols. 1 & 2), USNRC, 1989

13.5-9 SECY-11-0124, "Recommended Actions to be Taken Without Delay from the Near-Term Task Force Report", USNRC, September 9, 2011.

13.5-10 NEI 91-04 Revision 1, "Severe Accident Issue Closure Guidelines", NEI, 1994.

13.5-11 NEI 06-12 Revision 2, "B.5.b Phase 2 & 3 Submittal Guideline", NEI, 2006.

13.5-12 NEI 12-06 Revision 0, " Diverse and Flexible Coping Strategies (FLEX) Implementation Guide", NEI, 2012.

13.5-13 NEI 14-01 Revision 0, "Emergency Response Procedures and Guidelines for Beyond Design Basis Events and Severe Accidents", NEI, 2014.

Table 1.8-22 Experience Information Applicable to ABWR (Continued)

No.	Issue Date	Title	Comment
1370	9/89	Resolution of USI A-48	Subsection 19B.2.18
1275	2/91	Volume 6, Operating Experience Feedback Report Solenoid Operated Valve Problems	
1339	6/90	Resolution of Generic Safety Issue 29: Bolting Degradation of Failure in Nuclear Power Plants	Subsection 19B.2.62
CR-3922	1/85	Survey and Evaluation of System Interaction Events and Sources, Vol. 1, 2	Subsection 19B.2.59
CR-4261	3/86	Assessment of Systems Interactions in Nuclear Power Plants	Subsection 19B.2.59
CR-4262	SECY-11-0124	9/11 Recommended Actions to be Taken Without Delay from the Near-Term Task Force Report	Subsection 13.5.3.2
CR-4381		Core-Melt Frequencies at a GE BWR	
CR-4470	5/86	Survey and Evaluation of Vital Instrumentation and Control Power Supply Events	
CR-5055	5/88	Atmospheric Diffusion for Control Room Habitability Assessment	Subsection 19B.2.40
CR-5088	1/89	Fire Risk Scoping Study: Investigation of Nuclear Power Plant Fire Risk, Including Previously Unaddressed Issues.	
CR-5230	4/89	Shutdown Decay Heat Removal Analysis: Plant Case Studies and Special Issues	
CR-5347	6/89	Recommendations for Resolution of Public Comments on USI A-40	Subsection 19B.2.14
CR-5458	12/89	Value-Impact Assess for Candidate Operating Procedure Upgrade Program	
CR-4674	84/89	Precusors to Potential Severe Core Damage Accidents: Series	
Commission Order			
EA-12-051	3/12	Issuance of Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instruments	
Interim Staff Guidance			
JLD-ISG-2012-03	8/12	Compliance with Order EA-12-051, Reliable Spent Fuel Pool Instrumentation	