

Response to Action Item 10-2 Section 10.4.6

DCD Tier 2, SECTION 10.4.6

Issue #1 (AI 10-2.8)

On page 10.4-34, the applicant states, “operational procedures and maintenance programs are either prepared or to be included as COL information items. Procedures and maintenance programs are to be completed before fuel is loaded for commissioning.” However, this is confusing since it makes contradictory statements.

Revise the statement in FSAR Section 10.4.6 to clearly specify that the COL applicant will complete the development of procedures and maintenance programs before fuel is loaded for commissioning.

Response

FSAR Section 10.4.6 will be updated to be consistent with the existing COL Item 10.4(1).

Impact on DCD

The DCD will be revised as shown in Attachment.

Impact on PRA

There is no impact on the PRA.

Impact on Technical Specification

There is no impact on the Technical Specification.

Impact on Technical/Topical/Environmental Report

There is no impact on any Technical, Topical and Environmental Reports.

APR1400 DCD TIER 2

- e. The process piping containing contaminated solids is properly sized to facilitate flow and maintain sufficient velocities to prevent settling of solids. The piping is designed to reduce fluid traps, thus reducing the decontamination needs and waste generation.
- f. Utility connections (sluice water and service air) are designed with a minimum of two barriers to prevent cross-contamination.

Decommissioning Planning

- a. The SSCs are designed for the full service life and are fabricated as individual packaged assemblies for easy removal.
- b. The CPS is designed with no embedded or buried piping.

Operations and Documentation

The COL applicant is to establish operational procedures and maintenance programs for leak detection and contamination control (COL 10.4(1)).

- a. The CPS polishing operation is designed for automated operations with manual initiation for the different modes of operation. Adequate instrumentation, including conductivity, level, flow, and pressure elements, is provided to monitor and control the operations to prevent undue interruption, thus minimizing the spread of contamination and waste generation.
- b. Operational procedures and maintenance programs are either prepared or to be included as COL information items. Procedures and maintenance programs are to be completed before fuel is loaded for commissioning.
- c. Complete documentation of design, construction, design modifications, field changes, and operations is to be maintained by the COL applicant. Documentation requirements are included as a COL information items.

Site Radiological Environmental Monitoring

The CPS is designed with a low level of contamination through leakage in the SG. Industry experience demonstrates that the integrity of the CPS is well maintained, resulting

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DCD Tier 2, SECTION 10.4.6

Issue #2 (AI 10-2.9)

On page 10.4-34, the applicant states “complete documentation of design, construction, design modifications, field changes, and operations is to be maintained by the COL applicant. Documentation requirements are included as a COL information items.” Contrary to this statement, the staff did not find specific COL Information Items identified in the DCD which indicate what information must be submitted by the COL applicant at the time of its application.

Revise the DCD as appropriate to include specific COL Information Items which require the submittal of information regarding the condensate cleanup system by the COL applicant.

Response

FSAR Section 10.4.6 will be updated to be consistent with the existing COL Item 10.4(2).

Impact on DCD

The DCD will be revised as shown in Attachment.

Impact on PRA

There is no impact on the PRA.

Impact on Technical Specification

There is no impact on the Technical Specification.

Impact on Technical/Topical/Environmental Report

There is no impact on any Technical, Topical and Environmental Reports.

APR1400 DCD TIER 2

- e. The process piping containing contaminated solids is properly sized to facilitate flow and maintain sufficient velocities to prevent settling of solids. The piping is designed to reduce fluid traps, thus reducing the decontamination needs and waste generation.
- f. Utility connections (sluice water and service air) are designed with a minimum of two barriers to prevent cross-contamination.

Decommissioning Planning

- a. The SSCs are designed for the full service life and are fabricated as individual packaged assemblies for easy removal.
- b. The CPS is designed with no embedded or buried piping.

Operations and Documentation

- a. The CPS polishing operation is designed for automated operations with manual initiation for the different modes of operation. Adequate instrumentation, including conductivity, level, flow, and pressure elements, is provided to monitor and control the operations to prevent undue interruption, thus minimizing the spread of contamination and waste generation.
- b. Operational procedures and maintenance programs are either prepared or to be included as COL information items. Procedures and maintenance programs are to be completed before fuel is loaded for commissioning.
- c. Complete documentation of design, construction, design modifications, field changes, and operations is to be maintained by the COL applicant. Documentation requirements are included as a COL information items.

Site Radiological Environmental Monitoring

The CPS is designed with a low level of contamination through leakage in the SG. Industry experience demonstrates that the integrity of the CPS is well maintained, resulting

The COL applicant is to maintain the complete documentation of system design, construction, design modifications, field changes, and operations (COL 10.4(2)).