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## REVISED RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

### APR1400 Design Certification

Korea Electric Power Corporation / Korea Hydro & Nuclear Power Co., LTD

Docket No. 52-046

RAI No.: 267-8301  
SRP Section: 03.07.03 – Seismic Subsystem Analysis  
Application Section: 3.7.3  
Date of RAI Issue: 10/22/2015

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### **Question No. 03.07.03-2**

In accordance with 10 CFR 50 Appendix S, the staff reviewed the seismic subsystem analysis for the APR1400 standard design. Out of 13 areas reviewed following the SRP 3.7.3 Rev. 4 guidance, four of them reference DCD sections other than DCD Section 3.7, as listed below:

Section 3.7.3.10, Basis for Selection of Frequencies, refers to Section 3.9.2.2.4, Basis for Selection of Frequencies

Section 3.7.3.11, Interaction of Other Systems with Seismic Category I System, refers to Section 3.12.3.7, Non-Seismic/Seismic Interaction (II/I)

Section 3.7.3.12, Multiply-Supported Equipment and Components with Distinct Inputs, refers to Section 3.9.2.2.8, Multiple-Supported Equipment Components with Distinct Inputs

Section 3.7.3.13, Torsional Effects of Eccentric Masses, refers to Section 3.9.2.2.10, Torsional Effects of Eccentric Masses

However, the scope of subsystems covered by these DCD 3.7.3 sections may be broader than the scope covered by the referenced sections. For example, in addition to the inconsistency between the titles of DCD Section 3.7.3.11 and Section 3.12.3.7, Section 3.7.3.11 covers the interaction of all (non-Seismic Category I) systems with Seismic Category I systems, while the text of DCD Section 3.12.3.7 covers only the II/I interaction of piping systems. The applicant is requested to resolve this inconsistency and also to confirm there are no other scope inconsistency issues for the other three sections.

### **Response - (Rev. 1)**

Based on the SRP sections applicable to each of the items mentioned above, each item will be revised as follows.

#### 3.7.3.10 Basis for Selection of Frequencies

The fundamental frequencies of components and equipment are selected to be less than one-half or more than twice the dominant frequencies of the support structure to avoid resonance. The equipment **must be** adequately designed for the applicable loads if the equipment frequencies are within this range.

#### 3.7.3.11 Interaction of Other Systems with Seismic Category I Systems

The non-seismic Category I subsystems are designed to be isolated by either a constraint or barrier or are remotely located from any seismic Category I SSC. Otherwise, adjacent non-seismic Category I subsystems are analyzed according to the same seismic criteria as applicable to seismic Category I SSC. **For non-seismic Category I subsystems attached to seismic Category I SSCs, the dynamic effects of the non-seismic Category I subsystems should be simulated in the modeling of the seismic Category I SSC. The attached non-seismic Category I subsystems, up to the first anchor beyond the interface, should also be designed in such a manner that during an earthquake of SSE intensity it will not cause a failure of the seismic Category I SSC.**

#### 3.7.3.12 Multiply-Supported Equipment and Components with Distinct Inputs

The seismic response of multiply-supported equipment and components with distinct inputs are obtained by either the response spectrum approach or the time history approach.

Of the response spectrum approaches, the uniform support motion (USM) method is applied with a uniform response spectrum (URS) that envelops all of the individual response spectra at the various support locations. In addition, the maximum relative support displacements are imposed on the supports in the most unfavorable combination. The final responses are obtained by the absolute summation of responses due to inertial effects and relative displacements. As an alternative to the USM method, the independent support motion (ISM) method can be employed such that all of the criteria presented in NUREG-1061 related to the ISM method are satisfied.

When the time history approach is applied, time histories of support motions may be used as input excitations to the subsystems.

#### 3.7.3.13 Torsional Effects of Eccentric Masses

To consider the torsional effects of eccentric masses in seismic Category I subsystems, the eccentric masses are included in the mathematical model as eccentric masses located in their center of gravity coupled by, as applicable, either rigid members or elastic members with their own properties.

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### **Impact on DCD**

DCD Tier 2, Subsections 3.7.3.10, 3.7.3.11, 3.7.3.12, and 3.7.3.13 will be revised, as indicated in the attachment associated with this response.

**Impact on PRA**

There is no impact on the PRA.

**Impact on Technical Specifications**

There is no impact on the Technical Specifications.

**Impact on Technical/Topical/Environmental Reports**

There is no impact on any Technical, Topical, or Environmental Report.

**APR1400 DCD TIER 2****3.7.3.10 Basis for Selection of Frequencies**

~~Basis for selection of frequencies is addressed in Subsection 3.9.2.2.4.~~

See No.1 of page 2.

**3.7.3.11 Interaction of Other Systems with Seismic Category I Systems**

~~Interaction of other systems with the seismic Category I system is addressed in Subsection 3.12.3.7.~~

See No.2 of page 2.

**3.7.3.12 Multiply-Supported Equipment and Components with Distinct Inputs**

~~Multiply supported equipment and components with distinct inputs are addressed in Subsection 3.9.2.2.8.~~

See No.3 of page 2.

**3.7.3.13 Torsional Effects of Eccentric Masses**

~~Torsional effects of eccentric masses are addressed in Subsection 3.9.2.2.10.~~

See No.4 of page 2.

**3.7.4 Seismic Instrumentation**

Appendix S, "Earthquake Engineering Criteria for Nuclear Power Plant," of 10 CFR Part 50 (Reference 2), requires that suitable instrumentation be provided so that the seismic response of nuclear power plant features important to safety can be evaluated promptly after an earthquake. It also requires shutdown of the nuclear power plant if vibratory ground motion exceeds the OBE ground motion.

The seismic monitoring system meets the relevant requirements of 10 CFR Part 50, Appendix S. The seismic monitoring system provides information on the vibratory ground motion and the resultant vibratory responses of the representative seismic Category I structures during a seismic event.

The seismic monitoring system is not a safety system and does not have any effect on safety systems or equipment. The seismic monitoring system is designed for high accuracy, reliability, and to minimize the maintenance and surveillance activities required to support the system.

1. The fundamental frequencies of components and equipment are selected to be less than one-half or more than twice the dominant frequencies of the support structure to avoid resonance. The equipment must be adequately designed for the applicable loads if the equipment frequencies are within this range.

2. The non-seismic Category I subsystems are designed to be isolated by either a constraint or barrier or are remotely located from any seismic Category I SSC. Otherwise, adjacent non-seismic Category I subsystems are analyzed according to the same seismic criteria as applicable to seismic Category I SSC. For non-seismic Category I subsystems attached to seismic Category I SSCs, the dynamic effects of the non-seismic Category I subsystems should be simulated in the modeling of the seismic Category I SSC. The attached non-seismic Category I subsystems, up to the first anchor beyond the interface, should also be designed in such a manner that during an earthquake of SSE intensity it will not cause a failure of the seismic Category I SSC.

3. The seismic response of multiply-supported equipment and components with distinct inputs are obtained by either the response spectrum approach or the time history approach. Of the response spectrum approaches, the uniform support motion (USM) method is applied with a uniform response spectrum (URS) that envelops all of the individual response spectra at the various support locations. In addition, the maximum relative support displacements are imposed on the supports in the most unfavorable combination. The final responses are obtained by the absolute summation of responses due to inertial effects and relative displacements. As an alternative to the USM method, the independent support motion (ISM) method can be employed such that all of the criteria presented in NUREG-1061 related to the ISM method are satisfied. When the time history approach is applied, time histories of support motions may be used as input excitations to the subsystems.

4. To consider the torsional effects of eccentric masses in seismic Category I subsystems, the eccentric masses are included in the mathematical model as eccentric masses located in their center of gravity coupled by, as applicable, either rigid members or elastic members with their own properties.

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### **Question No. 03.07.03-5**

In accordance with 10 CFR 50 Appendix S, the staff reviewed the modal combination method in response spectrum analysis of APR1400 subsystems, as described in DCD Subsection 3.7.3.5, Combination of Modal Responses. The DCD indicates that the SRSS method is used to combine the modal responses when the modal frequencies are well separated; otherwise, the modal responses are combined in accordance with NRC RG 1.92. However, the DCD does not provide the criteria to be used to determine whether the modal frequencies are well separated. Per SRP 3.7.3 II.7 guidance, an acceptable modal combination method in response spectrum analysis of subsystems is the same as described in SRP Section 3.7.2, Subsection II.7, which is consistent with the NRC RG 1.92, Rev. 3 including the definition of closely spaced modes. DCD Subsection 3.7.2.7 appears to be consistent with SRP 3.7.2 II.7 regarding the modal combination method. Since DCD Subsection 3.7.3.5 does not provide the necessary criteria, per 10 CFR 50 Appendix S, the applicant is requested to specify and justify the criteria to be used for the purpose of determining whether modal frequencies are well separated.

### **Response - (Rev. 1)**

DCD Tier 2, Subsection 3.7.3.5 will be revised to provide the criteria to be used to determine whether modal frequencies are well separated as follows:

1. "For combination of modal responses of subsystems, Subsection 3.7.2.7 **should** be referred for details."
2. "The criteria for determining how modal frequencies are separated are specified in RG 1.92, **Rev. 3** as the definition of modes with closely spaced frequencies."

The definition of modes with closely spaced frequencies is a function of the critical damping ratio and is as follows:

- (1) For critical damping ratios  $\leq 2\%$ , modes are considered closely spaced if the frequencies are within 10% of each other (i.e., for  $f_i < f_j$ ,  $f_j \leq 1.1 f_i$ )
  - (2) For critical damping ratio  $> 2\%$ , modes are considered closely spaced if the frequencies are within five times the critical damping ratio of each other (i.e., for  $f_i < f_j$  and 5% damping,  $f_j \leq 1.25 f_i$ , for  $f_i < f_j$  and 10% damping,  $f_j \leq 1.5 f_i$ )"
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**Impact on DCD**

DCD Tier 2, Subsection 3.7.3.5 will be revised, as indicated in the attachment associated with this response.

**Impact on PRA**

There is no impact on the PRA.

**Impact on Technical Specifications**

There is no impact on the Technical Specifications.

**Impact on Technical/Topical/Environmental Reports**

There is no impact on any Technical, Topical, or Environmental Report.

**APR1400 DCD TIER 2****3.7.3.3 Analysis Procedures for Damping**

The analysis procedure used to account for the damping in subsystems conforms with Subsections 3.7.1.2 and 3.7.2.15.

**3.7.3.4 Three Components of Earthquake Motion**

Seismic responses resulting from analysis of subsystems due to three components of earthquake motions are combined in the same manner as the seismic response resulting from the analysis of building structures as specified in Subsection 3.7.2.6.

**3.7.3.5 Combination of Modal Responses**

See No.1 of page 2.

When a response spectrum method of analysis is used to analyze a subsystem, the maximum responses such as accelerations, shears, and moments in each mode are calculated regardless of time. If the frequencies of the modes are well separated, the SRSS method of mode combination gives acceptable results; however, where the structural frequencies are not well separated, the modes are combined in accordance with NRC RG 1.92.



See No.2 of page 2.

**3.7.3.6 Use of Constant Vertical Static Factors**

In general, seismic Category I subsystems are analyzed in the vertical direction using the methods specified in Subsection 3.7.3.1. No constant vertical static factors are used for subsystems.

**3.7.3.7 Buried Seismic Category I Piping, Conduits, and Tunnels**

During an earthquake, buried structures such as piping, conduits, and tunnels respond to various seismic waves propagating through the surrounding soil as well as to the dynamic differential movements of the buildings to which the structures are connected. The various waves associated with earthquake motion are P (compression) waves, S (shear) waves, and Rayleigh waves. The stresses in the buried structure are governed by the velocity and angle of incidence of these traveling waves. However, the wave types and their directions during an earthquake are very complex. For design purposes, the seismic-



1. For combination of modal responses of subsystems, Subsection 3.7.2.7 **should** be referred for details.

2. The criteria for determining how modal frequencies are separated are specified in RG 1.92, **Rev. 3** as the definition of modes with closely spaced frequencies.

The definition of modes with closely spaced frequencies is a function of the critical damping ratio and is as follows;

(1) For critical damping ratios  $\leq 2\%$ , modes are considered closely spaced if the frequencies are within 10% of each other (i.e., for  $f_i < f_j$ ,  $f_j \leq 1.1f_i$ )

(2) For critical damping ratio  $> 2\%$ , modes are considered closely spaced if the frequencies are within five times the critical damping ratio of each other (i.e., for  $f_i < f_j$  and 5% damping,  $f_j \leq 1.25 f_i$ , for  $f_i < f_j$  and 10% damping,  $f_j \leq 1.5 f_i$ )