**U.S. NUCLEAR REGULATORY COMMISSION**

# STANDARD REVIEW PLAN

**OFFICE OF NUCLEAR REACTOR REGULATION**

## 5.2.1.1 COMPLIANCE WITH THE CODES AND STANDARDS RULE, 10 CFR ~~§~~ 50.55a[1] [1-2]

REVIEW RESPONSIBILITIES

Primary - Mechanical Engineering Branch ~~(MEB)~~(EMEB)[3]

Secondary - None

## I. AREAS OF REVIEW

In order to establish that pressure-retaining components of the reactor coolant pressure boundary (RCPB)[4] and other fluid systems important to safety of water-cooled nuclear power plants are in compliance with the Codes and Standards Rule 10 CFR ~~§~~ 50.55a, an applicant is required to provide a table in ~~his~~the[5] safety analysis report (SAR) identifying pressure vessels, piping, pumps and valves, and the component Code, Code Edition, applicable Addenda, and ~~component~~[6] order date (where applicable) for each component. 10 CFR ~~§~~ 50.55a requires that pressure-retaining components of the ~~reactor coolant pressure boundary be designated as~~RCPB

[1]This section is used to verify that the acceptable component Codes (i.e., applicable ASME Code Class), Code editions, and addenda required by 10 CFR 50.55a are identified for component construction. The review performed under this section is closely coordinated with the review described in SRP Section 3.2.2. More detailed review of compliance with ASME Code requirements for the component Code Class (e.g., component welds verified to meet requirements applicable for the Code Class) is performed in many other SRP sections. The applicant's framework for compliance with 10 CFR 50.55a requirements for application of codes during the inservice phase of the component life is also reviewed in many other SRP sections (e.g., 3.9.6, 5.2.4, 6.6, etc.).

meet requirements for Class 1[2] components and thereby be constructed[3] in accordance with the corresponding[7] rules of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section III, Division 1 (Reference 4, hereafter the Code)[8], except for components which meet the exclusion requirements of ~~footnote 2 of the rule~~10 CFR 50.55a(c).[9] Components of the reactor coolant pressure boundary which meet the exclusion requirements of ~~footnote 2~~10 CFR 50.55a(c)[10] may be classified as Quality Group B in accordance with Regulatory Guide 1.26 and constructed as Class 2 components in accordance with the Code.

The Codes and Standards Rule also requires that pressure-retaining components of other fluid systems important to safety ~~be~~ designated as Quality Group B~~Class 2,~~[11] or Quality Group C ~~Class 3, and Class MC[‡] components and constructed in accordance with the rules of the~~meet Code requirements for Class 2[4] or Class 3 components, respectively.[12]

To meet these requirements, components of other fluid systems important to safety may be classified as Quality Group ~~B or C~~B, C, or D[13] in accordance with the guidance provided in Regulatory Guide 1.26, which is an acceptable method for determining the appropriate Code Class for most non-RCPB pressure-retaining components.[14] ~~This review of Quality Group B and Quality Group C~~A review of Quality Group B, C, or D[15] components of other fluid systems important to safety is performed under ~~SRP~~Standard Review Plan (SRP)[16] Section 3.2.2.

For construction permit (CP), standard design certification,[17] and operating license (OL) applications, the ~~M~~EMEB[18] will determine the acceptability of the information presented in the SAR to ~~assure~~ensure[19] that the applicant is in compliance with the rules of ~~Section~~10 CFR[20] 50.55a.

In the event there are cases where conformance with the Codes and Standards Rule would result in hardships or unusual difficulties without a compensating increase in the level of safety and quality, the applicant must provide a complete description of the circumstances and the basis for proposed alternate requirements. The applicant must describe how an equivalent and acceptable level of safety and quality will be provided by the proposed alternate requirements. The SAR should identify differences between the specific portions of the Code and Code Addenda to which each component has been constructed and that which is required for conformance with ~~Section~~10 CFR[21] 50.55a.

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[2]Editions of the Code prior to 1971 use the term Class A in lieu of Class 1.

[3]Constructed, as used herein, is an all-inclusive term comprising material certification, design, fabrication, examination, testing, inspection, and certification required in the manufacture and installation of components.

~~[‡]Editions of the Code prior to 1971 use the term Class B in lieu of Class MC.~~[d]

[4]Editions of the Code prior to 1971 use the term Class C in lieu of Class 2.

Review Interfaces[22]

The ~~MTEB~~EMCB[23] verifies, upon request of ~~MEB~~the EMEB,[24] the compatibility of the materials of construction with service conditions and, as required, ~~will provide~~provides[25] assistance in establishing acceptability in the event an applicant ~~invokes the "hardship" clause~~proposes alternatives in accordance with 10 CFR 50.55a(a)(3)[26] and does not conform in all respects with ~~Section~~10 CFR[27] 50.55a.

## II. ACCEPTANCE CRITERIA

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

1. 10 CFR Part 50, Appendix A, General Design Criterion 1, as it relates to the requirement that structures, systems, and components important to safety shall be designed, fabricated, erected, and tested to quality standards commensurate with the importance of the safety function to be performed.

2. 10 CFR ~~Section~~[28] 50.55a as it relates to establishing minimum quality standards for the design, fabrication, erection, construction, testing, and inspection of components within the reactor coolant pressure boundary and other fluid systems important to safety of boiling and pressurized water reactor nuclear power plants by requiring conformance with appropriate editions of specified published industry codes and standards.

To meet the requirements of General Design Criterion 1 and 10 CFR ~~Section~~[29] 50.55a, Regulatory Guide 1.26, "Quality Group Classification and Standards for Water-, Steam-, and Radioactive-Waste-Containing Components of Nuclear Power Plants,"[30] is used. This regulatory guide describes an acceptable method for determining quality standards for Quality Group B, C, and D water- and steam-containing components important to safety of water-cooled nuclear power plants.

Technical Rationale

The technical rationale for application of the acceptance criteria for compliance with General Design Criterion 1 and 10 CFR 50.55a is discussed in the following paragraphs:[31]

A. Compliance with General Design Criterion 1 requires that components be designed, fabricated, erected, and tested to quality standards commensurate with the importance of the safety function to be performed.

SRP Section 5.2.1.1 cites Regulatory Guide 1.26 to provide quality group classifications for water, steam, and radioactive waste containing components (pressure vessels, piping, pumps, valves, and storage tanks) that are commensurate with the importance of the safety function to be performed. Conformance with these quality group classifications requires that components of the RCPB and other specified components intended to contain radioactive materials meet the requirements of Section III of the ASME Code. The Code imposes specific requirements[32] to ensure that these components will perform

acceptably, commensurate with their intended safety function, when designed in accordance with ASME Code provisions.

The staff considers these requirements adequate to provide assurance that these components will perform acceptably, commensurate with the importance of their safety function, and will contain radioactive materials.[33]

B. Section 50.55a of 10 CFR requires that components be designed, fabricated, erected, constructed, tested, and inspected to quality standards commensurate with the importance of the safety function to be performed.

10 CFR 50.55a[34] specifies that components of the RCPB and Quality Group B and C components (as defined in Regulatory Guide 1.26) must meet the requirements of Section III of the ASME Code. The Code imposes specific requirements[35] to ensure that these components will perform acceptably, commensurate with their intended safety function, when designed in accordance with ASME Code provisions.

The staff considers these requirements adequate to provide assurance that these components will perform acceptably, commensurate with the importance of their safety function, and will contain radioactive materials.[36]

## III. REVIEW PROCEDURES

The table provided by the applicant identifying pressure vessel components, piping, pumps and valves, and the corresponding component Code, Code Edition, applicable Addenda, and, when required, the ~~component~~ order date of each ASME Section III, Class 1 ~~and 2 component within the reactor coolant pressure boundary~~, 2, and 3 component[37] is checked for compliance with ~~Section 50.55a of 10 CFR Part 50~~10 CFR 50.55a.[38] The evaluation of the ASME Code Class requirements to be applied for non-RCPB components is based on the acceptable component Quality Group classifications verified under SRP Section 3.2.2.[39] This review is applicable to CP, standard design certification,[40] and OL applications.

For those components ~~within the reactor coolant pressure boundary~~[41] that are not in compliance with the rules of ~~Section~~10 CFR[42] 50.55a, a review of the Code, Code Addenda, and SAR is performed to identify the specific sections of the Code with which the component does not comply. ~~A decision to accept a component which is not fully in compliance with the rules is based on a judgment of the relative importance of the specific provisions in the Code or Code Addenda not complied with, and a determination that any noncompliance will not result in an unacceptable level of safety and quality.~~Proposed alternatives to the requirements of 10 CFR 50.55a(c), (d), (e), (f), (g), and (h) may be used when authorized by the Director of the Office of Nuclear Reactor Regulation. Where so proposed, the staff evaluates whether the applicant has demonstrated one of the following:

1. The proposed alternatives would provide an acceptable level of quality and safety; or

2. Compliance with the specified requirements of 10 CFR 50.55a would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.[43]

If the staff's concerns are not resolved in a satisfactory manner, a staff position is taken ~~requiring conformance with the rules of Section~~in conformance with 10 CFR[44] 50.55a.

For standard design certification reviews under 10 CFR Part 52, the procedures above should be followed, as modified by the procedures in SRP Section 14.3 (proposed), to verify that the design set forth in the standard safety analysis report, including inspections, tests, analysis, and acceptance criteria (ITAAC), site interface requirements and combined license action items, meet the acceptance criteria given in subsection II. SRP Section 14.3 (proposed) contains procedures for the review of certified design material (CDM) for the standard design, including the site parameters, interface criteria, and ITAAC.[45]

## IV. EVALUATION FINDINGS

The reviewer should verify that sufficient information is contained in the SAR and amendments and that his evaluation supports conclusions of the following type, which are to be included in the staff's safety evaluation report:

The staff concludes that system components are in compliance with 10 CFR 50.55a and meet the requirements of General Design Criterion 1. This conclusion is based on the following:

> The applicant has met the requirements of 10 CFR ~~§~~ 50.55a and General Design Criterion 1 with respect to the construction of structures, systems, and components important to safety to quality standards. The requirements have been met by ~~assuring~~ensuring[46] that the components of the reactor coolant pressure boundary, as defined by the rules of 10 CFR ~~§~~ 50.55a, have been properly classified in Table x.x-x of the SAR as ASME Section III, Class 1 (Quality Group A) components, except for those reactor coolant pressure boundary components which meet the exclusion requirements of ~~footnote 2 of the rule~~10 CFR 50.55a(c).[47] These reactor coolant pressure boundary components are classified Quality Group B in accordance with the guidance provided in Regulatory Position C.1 of Regulatory Guide 1.26 and are constructed as ASME Section III, Class 2 components. Table x.x-x identifies the component Code, Code Edition, ~~and Code Addenda~~applicable Addenda, and, when required, the order date[48] for each Quality Group A component such as: reactor vessel, steam generators (primary side), pressurizer, reactor coolant pumps, pressurizer relief valves, control valves, block valves, other reactor coolant pressure boundary valves, and interconnecting piping of the reactor coolant pressure boundary and each Quality Group B component such as: steam generators (secondary side) and interconnecting piping and valves of the reactor coolant pressure boundary which meet the exclusion requirements of ~~footnote 2 of the rule~~10 CFR 50.55a(c).[49]
>
> The requirements of 10 CFR 50.55a have been met by ensuring that components defined therein that are not part of the reactor coolant pressure boundary have been properly classified in Table x.x-x of the SAR as ASME Section III, Class 2 (Quality Group B) or Class 3 (Quality Group C). These components are acceptably classified as Quality Group B or C based upon the staff's guidance for component quality group classification described in SRP Section 3.2.2 and are constructed as ASME Section III, Class 2 or 3 components. Table x.x-x identifies the component Code, Code Edition, applicable

Addenda, and, when required, the order date for each Quality Group B and C component.[50]

~~We~~The staff[51] reviewed the component Code, Code Edition, and Addenda as applied to each of these ~~reactor coolant pressure boundary~~[52] components ~~and we find~~and finds that[53] they are constructed in accordance with the requirements of the applicable Codes and Addenda that are specified by the rules of 10 CFR 50.55a. ~~Our~~The staff's[54] review of ~~Quality Group B (ASME Section III, Class 2) and Quality Group C (ASME Section III, Class 3)~~quality group classifications for[55] components of other fluid systems important to safety is ~~performed~~described[56] in Section 3.2.2 of the ~~SER~~safety evaluation report (SER).[57]

The applicant has met the requirements of General Design Criterion 1 with respect to components ~~of the reactor coolant pressure boundary~~[58] being designed to ~~assure~~ensure[59] that component quality is commensurate with the importance of the safety function ~~of the reactor coolant pressure boundary~~. The provisions of the ASME Code ~~has~~and the staff's guidance regarding component quality group classification described in SRP Section 3.2.2 have[60] been met, which constitutes an acceptable basis for satisfying the requirements of General Design Criterion 1.

For design certification reviews, the findings will also summarize, to the extent that the review is not discussed in other safety evaluation report sections, the staff's evaluation of inspections, tests, analyses, and acceptance criteria (ITAAC), including design acceptance criteria (DAC), site interface requirements, and combined license action items that are relevant to this SRP section.[61]

## V. IMPLEMENTATION

The following is intended to provide guidance to applicants and licensees regarding the NRC staff's plans for using this SRP section.

This SRP section will be used by the staff when performing safety evaluations of license applications submitted by applicants pursuant to 10 CFR 50 or 10 CFR 52.[62] Except in those cases in which the applicant proposes an acceptable alternative method for complying with specified portions of the Commission's regulations, the method described herein will be used by the staff in its evaluation of conformance with Commission regulations.

The provisions of this SRP section apply to reviews of applications docketed six months or more after the date of issuance of this SRP section.[63]

Implementation schedules for conformance to parts of the method discussed herein are contained in the referenced regulation regarding use of Codes and Standards ~~Rule~~,[64] 10 CFR ~~Section~~[65] 50.55a, and the regulatory guide.

## VI. REFERENCES

~~2~~1[66]. 10 CFR ~~Section~~[67] 50.55a, "Codes and Standards ~~Rule~~."[68]

~~1~~2[69]. 10 CFR Part 50, Appendix A, General Design Criterion 1, "Quality Standards and Records."

~~4~~3[70]. Regulatory Guide 1.26, "Quality Group Classifications and Standards for Water-, Steam-, and Radioactive-Waste-Containing Components of Nuclear Power Plants."[71]

~~3~~4. ASME Boiler and Pressure Vessel Code, ~~1980 Edition,~~[72] Section III, "Nuclear Power Plant Components," American Society of Mechanical Engineers ~~(1980)~~.[73]

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## SRP Draft Section 5.2.1.1
Attachment A - Proposed Changes in Order of Occurrence

Item numbers in the following table correspond to superscript numbers in the redline/strikeout copy of the draft SRP section.

| Item | Source | Description |
|---|---|---|
| 1. | Editorial correction | Corrected CFR citation to 10 CFR 50.55a (global change for entire SRP section). |
| 2. | Editorial | Added a footnote for clarification that this SRP section does not provide a complete review of compliance with 10 CFR 50.55a as might be inferred from the title of the SRP section and the numerous aspects of component construction asserted to be included herein in footnote 3. Discussion and examples of further reviews in other SRP sections relating to 10 CFR 50.55a requirements were also added.Since, as indicated in the added footnote, the SRP Section does not address compliance with all current 10 CFR 50.55a requirements, the PRB may wish to evaluate whether a change to the title of this SRP section should be made. |
| 3. | Current primary review branch abbreviation | Changed "MEB" to "EMEB" under REVIEW RESPONSIBILITIES. |
| 4. | Editorial | Established a commonly used acronym at the point of first use of the associated term. |
| 5. | Editorial modification | Changed word "his" to "the plant's" to remove reference to gender. |
| 6. | Editorial modification | Deleted redundant use of "component." |
| 7. | Editorial | Revised to reflect the requirements of 10 CFR 50.55a(c). 10 CFR 50.55a(c) does not require that any components be "designated as Class 1." Instead, 10 CFR 50.55a(c) requires that reactor coolant pressure boundary components meet Code requirements for Class 1 components. |
| 8. | SRP-UDP format item | Added identification by reference number for the first full citation of the ASME Code, Section III. |
| 9. | Implementation of 10 CFR 50.55a(c) requirements | Cited applicable section in revised CFR. In an amendment to the regulation, the previously cited footnote was deleted and its former text incorporated as now cited. |
| 10. | Implementation of 10 CFR 50.55a(c) requirements | Cited applicable section in revised CFR. In an amendment to the regulation, the previously cited footnote was deleted and its former text incorporated as now cited. |

| Item | Source | Description |
|---|---|---|
| 11. | Editorial | Revised to reflect the requirements of 10 CFR 50.55a(d). 10 CFR 50.55a(d) does not require that any components be "designated as Class 2." Instead, 10 CFR 50.55a(d) requires that components classified as Quality Group B meet Code requirements for Class 2 components. |
| 12. | **Integrated Impact No. 232**, Editorial | Deleted "and Class MC" from sentence because 10 CFR 50.55a does not address this class of components. Also eliminated footnote 4, which refers to Class MC components. Also revised to reflect the current requirements of 10 CFR 50.55a(d) and (e) which require that components classified as Quality Group B or C meet Code requirements for Class 2 or 3 components. |
| 13. | **Integrated Impact No. 232** | Cited quality groups B, C, and D to describe the provisions of Regulatory Guide 1.26 accurately. |
| 14. | Editorial | Revised to clarify that some staff positions regarding use of Code Class components in certain applications are not covered in RG 1.26. |
| 15. | **Integrated Impact No. 232** | Substituted "A review of Quality Group B, C, or D" for "This review of Quality Group B and Quality Group C" to describe the review under SRP Section 3.2.2 relative to the review of "other components important to safety." |
| 16. | Editorial modification | Defined "SRP" as "Standard Review Plan." |
| 17. | SRP-UDP format item | Added the phrase "standard design certification" in the sentence to update the scope of the review. |
| 18. | Current primary review branch abbreviation | Substituted "EMEB" for "MEB." |
| 19. | Editorial correction | Substituted "ensure" for "assure" to correct usage. |
| 20. | Editorial modification | Substituted "10 CFR" for "Section" for completeness and consistency. |
| 21. | Editorial modification | Substituted "10 CFR" for "Section" for completeness and consistency. |
| 22. | SRP-UDP format item | Added "Review Interfaces" subheading to AREAS OF REVIEW. |
| 23. | Current interfacing review branch abbreviation | Substituted "EMCB" for "MTEB." |
| 24. | Current primary review branch abbreviation | Substituted "EMEB" for "MEB." |
| 25. | Editorial correction | Substituted "provides" for "will provide" to maintain parallel sentence construction. |

| Item | Source | Description |
|---|---|---|
| 26. | Editorial modification | Substituted "proposes alternatives in accordance with 10 CFR 50.55(a)(3)(i) or (ii)" for "invokes the hardship clause" to provide a clear citation of the relevant provisions of the regulation. |
| 27. | Editorial modification | Substituted "10 CFR" for "Section" for completeness and consistency. |
| 28. | Editorial modification | Deleted "Section" for consistency. |
| 29. | Editorial modification | Deleted "Section" for consistency. |
| 30. | Reference Verification | Added current full title for RG 1.26. |
| 31. | SRP-UDP format item | Added "Technical Rationale" subsection and introductory paragraph to ACCEPTANCE CRITERIA to describe the bases for the criteria applied. |
| 32. | Resolution of PRB Comments | As recommended in PRB comments, the word used in draft A was revised from "restrictions" to "requirements." |
| 33. | SRP-UDP format item, Resolution of PRB Comments | Added paragraph to describe the safety benefits of conforming to GDC 1. The paragraph has been modified with respect to draft A to reflect the PRB's suggested text. It should be noted that since the review described in this SRP section appears to exclusively cover components, language regarding structures and systems has been omitted from the Technical Rationale for consistency with the review performed/described herein. |
| 34. | Resolution of PRB Comments | As recommended in PRB comments, the phrase "To this end" used in draft A was deleted. |
| 35. | Resolution of PRB Comments | As recommended in PRB comments, the word used in draft A was revised from "restrictions" to "requirements." |
| 36. | SRP-UDP format item, Resolution of PRB Comments | Added paragraph to describe the safety benefits of conforming to 10 CFR 50.55a. The paragraph has been modified with respect to draft A to reflect the PRB's suggested text. It should be noted that since the review described in this SRP section appears to exclusively cover components, language regarding structures and systems has been omitted from the Technical Rationale for consistency with the review performed/described herein. |
| 37. | **Integrated Impact No. 232** | Substituted "2 and 3 component" for "and 2 component within the reactor coolant pressure boundary" to conform to the current revision of 10 CFR 50.55a. Deleted redundant use of "component." |

| Item | Source | Description |
|---|---|---|
| 38. | Editorial modification | Substituted "10 CFR 50.55a" for "Section 50.55a of 10CFR Part 50" for consistency. |
| 39. | **Integrated Impact 232** | Added reference to SRP Section 3.2.2 as the starting point for the review since acceptable Quality Group classification for each component is verified in SRP Section 3.2.2. It should be noted that SRP Section 3.2.2 includes evaluation of component classification based on Regulatory Guide 1.26 and on some guidance supplemental to Regulatory Guide 1.26 for certain components. |
| 40. | SRP-UDP format item | Added the phrase "standard design certification" to update the scope of the review. |
| 41. | **Integrated Impact No. 232** | Deleted "within the reactor coolant pressure boundary" to reflect to the current requirements of 10 CFR 50.55a. |
| 42. | Editorial modification | Substituted "10 CFR" for "Section" for consistency. |
| 43. | **Integrated Impact No. 1335** | Deleted the sentence "A decision to . . . safety and quality." and substituted the wording of 10 CFR 50.55a(a)(3), conforming to the current requirements of the CFR. |
| 44. | Editorial | Deleted "requiring conformance with the rules of Section" and substituted "in conformance with 10 CFR" to be consistent throughout the SRP section. |
| 45. | SRP-UDP Guidance, Implementation of 10 CFR 52 | Added standard paragraph to address application of Review Procedures in design certification reviews. |
| 46. | Editorial correction | Substituted "ensuring" for "assuring" to correct usage. |
| 47. | Editorial modification | Substituted "10 CFR 50.55a(c)" for "footnote 2 of the rule" to cite text correctly. The text formerly in footnote 2 was incorporated in 10 CFR 50.55a(c) in an amendment to the regulation. |
| 48. | Editorial modification | Substituted "applicable Addenda, and, when required, the order date" for "and Code Addenda" to ensure that the table description will be complete. |
| 49. | Editorial modification | Substituted "10 CFR 50.55a(c)" for "footnote 2 of the rule" to cite text correctly. The text formerly in footnote 2 was incorporated in 10 CFR 50.55a(c) in an amendment to the regulation. |
| 50. | **Integrated Impact No. 232** | Added paragraph to EVALUATION FINDINGS describing the bases for concluding that non-RCPB ASME Code Class 2 components and Class 3 components are properly classified by quality group. |
| 51. | Editorial modification | Substituted "The staff" for "We" to identify reviewers. |

| Item | Source | Description |
|---|---|---|
| 52. | **Integrated Impact No. 232** | Deleted "reactor coolant pressure boundary" to reflect the current scope of 10 CFR 50.55a. |
| 53. | Editorial modification | Substituted "and finds" for "we find that" since "we" is identified as "the staff" earlier in the sentence. |
| 54. | Editorial modification | Substituted "The staff's" for "Our" to identify reviewers. |
| 55. | **Integrated Impact No. 232** | Substituted "quality group classifications" for "Quality Group B (ASME Section III, Class 2) and Quality Group C (ASME Section III, Class 3)" to describe the review in SRP Section 3.2.2 relative to the review described in SRP Section 5.2.1.1. |
| 56. | Editorial | Revised to clarify that SER Section 3.2.2 describes, rather than performs the staff's review of quality group classification. |
| 57. | Editorial modification | Defined "SER" as "safety evaluation report." |
| 58. | **Integrated Impact No. 232** | Deleted "reactor coolant pressure boundary" to reflect the current scope of 10 CFR 50.55a. |
| 59. | Editorial correction | Substituted "ensure" for "assure" to correct usage. |
| 60. | **Integrated Impact No. 232** | Substituted "and staff's guidance regarding component quality group classification..." for "has" to reflect information currently provided in 10 CFR 50.55a, including identification of SRP Section 3.2.2 as guidance for component quality group classification. It should be noted that RG 1.26 guidance discussed in 10 CFR 50.55a is encompassed by citing SRP Section 3.2.2 which applies RG 1.26 and other supplemental guidance for component classification. |
| 61. | Implementation of 10 CFR Part 52, Subpart C, Combined Licenses | To address design certification reviews a new paragraph was added to the end of the Evaluation Findings. This paragraph addresses design certification specific items including ITAAC, DAC, site interface requirements, and combined license action items. |
| 62. | SRP-UDP Guidance, Implementation of 10 CFR 52 | Added standard sentence to address application of the SRP section to reviews of applications filed under 10 CFR Part 52, as well as Part 50. |
| 63. | SRP-UDP Guidance | Added standard paragraph to indicate applicability of this section to reviews of future applications. |
| 64. | Resolution of PRB Comment | Revised to eliminate use of the word "Rule" as recommended by the PRB. |
| 65. | Editorial modification | Deleted "Section" for consistency. |
| 66. | SRP-UDP format item | Reordered the listing of references to properly sequence CFR references. |

| Item | Source | Description |
|---|---|---|
| 67. | Editorial modification | Deleted "Section" for consistency. |
| 68. | Editorial correction | Deleted "Rule" to correct title. |
| 69. | SRP-UDP format item | Reordered the listing of references to properly sequence CFR references. |
| 70. | SRP-UDP format item | Reordered reference listing so that NRC regulations and publications precede non-NRC publications. |
| 71. | Reference Verification | Added current full title for RG 1.26. |
| 72. | **Integrated Impact No. 231** | Deleted reference to 1980 ASME Code in accordance with provisions of 10 CFR 50.55a. |
| 73. | **Integrated Impact No. 231.** | Deleted reference to 1980 ASME Code in accordance with provisions of 10 CFR 50.55a. |

## SRP Draft Section 5.2.1.1
Attachment B - Cross Reference of Integrated Impacts

| Integrated Impact No. | Issue | SRP Subsections Affected |
|---|---|---|
| 231 | Revise references in SRP Section 5.2.1.1 so that citations of the ASME Code are not version-specific. | Reference 3. |
| 232 | Revise SRP Section 5.2.1.1 to reflect a review of component Code, Code Edition, applicable Addenda, and order date (where applicable) for all ASME Class 1, 2, and 3 components. | AREAS OF REVIEW, 2nd and 3rd paragraph.<br><br>REVIEW PROCEDURES, 1st and 2nd paragraph.<br><br>EVALUATION FINDINGS, new 5th paragraph added.<br><br>EVALUATION FINDINGS, 6th and 7th paragraphs. |
| 233 | Revise SRP Section 5.2.1.1 to accommodate 10 CFR Part 52. Specifically, include a review of the applicant's justification of Code Editions and Addenda in the AREAS OF REVIEW, REVIEW PROCEDURES, and EVALUATION FINDINGS sections. | No changes were made to SRP Section 5.2.1.1 based on Integrated Impact No. 233.<br><br>(Note that standard paragraphs regarding design certification reviews were added at the end of the REVIEW PROCEDURES and EVALUATION FINDINGS sections to address 10 CFR Part 52 reviews.) |
| 234 | Revise 10 CFR Part 52, 10 CFR 50.55a, and/or the ASME Code to accommodate COL licensing actions. | No changes were made to SRP Section 5.2.1.1 based on Integrated Impact No. 234. |
| 1335 | Revise SRP Section 5.2.1.1 to comply with 10 CFR 50.55a(3) regarding components that are not in compliance with the rule. | REVIEW PROCEDURES, 2nd and 3rd paragraphs |