

United States Nuclear Regulatory Commission **Protecting People and the Environment**

Briefing on Design Acceptance Criteria

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Design Acceptance Criteria

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Agenda

- Recent developments
- Background on design acceptance criteria (DAC)
- DAC and digital instrumentation and controls (I&C)
- DAC closure process
- Conclusions

ACRS Letter August 9, 2010

- Underlying concerns with DAC
 - Leaving DAC open until post-Combined License (COL)
 - Relationship between level of design detail and safety
 - DAC lack specificity and over-used
 - Digital I&C systems have changed since DAC conceived
 - Require expertise and judgment to close

ACRS Letter (cont'd)

- Recommendation 1
 - Expertise required for DAC inspections
 - Independent assessment by ACRS
- Recommendation 2
 - Limit DAC resolved post-COL issuance
 - Consistent scope and depth of evaluation regardless of when DAC closed

Staff Response - October 7, 2010

- Recommendation 1
 - Agree technical expertise required
 - Propose role for ACRS in DAC closure consistent with past practice
- Recommendation 2
 - Agree preferable to close DAC early
 - Agree to consistent scope and depth of evaluation

Staff Response (cont'd)

- Assessment of other issues:
 - Safety finding made on entire application, not just DAC
 - Continue to allow use of DAC where appropriate
 - Use technical expertise and sound procedures to verify DAC implementation

DAC Policy

- Consistent over past 20 years
 - DAC should be objective
 - Design certification, including one that relies on DAC, is final safety determination
 - Additional design detail developed to satisfy DAC will not alter safety conclusion
 - Limited to a few areas
- DAC policy periodically reaffirmed

Use of DAC for Digital I&C

- Used in all four certified designs
- Used in all but one design certification under review
- Design flexibility is desirable
- Use appears to be declining
- Newer designs may not be amenable to DAC

DAC Closure Verification Process

- Verify completion of the licensee's activities to meet DAC
- Resultant design must meet both:
 - Acceptance criteria in DAC
 - Licensing basis

DAC Inspections

- All DAC are inspected
- Use inspection procedures developed specifically for DAC
- Use subject matter experts for DAC inspections
- Digital I&C inspection procedures being tested with South Texas Project (STP) applicant

Staff Proposal to ACRS

- ACRS involvement in inspection program for DAC
 - Similar to approach for Reactor
 Oversight Process (ROP)
 - Discuss strategy for program
 - Review inspection procedures
 - Review first implementation of STP

Conclusion

- Safety finding made on entire application, not just DAC
- Continue to allow use of DAC where appropriate
- Use technical expertise and sound procedures to verify DAC implementation

Acronyms

- ACRS Advisory Committee on Reactor Safeguards
- COL Combined License
- DAC Design Acceptance Criteria
- I&C Digital Instrumentations and Controls
- ROP Reactor Oversight Process
- STP South Texas Project