The requirements of *proposed* 10CFR52.80(b) specify that the contents of a combined license application must include the proposed inspections, tests, and analyses, including those applicable to emergency planning, that the licensee shall perform, and the acceptance criteria which are necessary and sufficient to provide reasonable assurance that, if the inspections, tests, and analyses are performed and the acceptance criteria met, the facility has been constructed and will operate in conformity with the combined license, the provisions of the Atomic Energy Act , and the NRCs regulations.

Combined license (COL) applications may incorporate by reference early site permits (ESPs), design certification documents (DCDs), neither, or both. The requirements for inclusion of ITAAC in an ESP are specific to emergency planning ITAAC (EP-ITAAC) and are contained in *proposed* 10 CFR 52.17(b)(3). The requirements for inclusion of ITAAC in a DCD are contained in 10 CFR 52.47(a)(vi). Since the requirement for including ITAAC in an ESP has not existed since Part 52 was first promulgated, there may be ESPs issued by the NRC and referenced in a COL application that do not contain ITAAC. Based on the above requirements, the following variations for a COL application, with respect to the inclusion of ITAAC, may exist:

- 1. COL that **does not** reference either an ESP or a DCD
- 2. COL that references an ESP which **does not** contain ITAAC and that **does not** reference a DCD
- 3. COL that references an ESP which **does** contain ITAAC and that **does not** reference a DCD
- 4. COL that references an ESP which **does not** contain ITAAC and that **does** reference a DCD
- 5. COL that references an ESP which **does** contain ITAAC and that **does** reference a DCD

Since COL applications may incorporate by reference early site permits (ESPs), design certification documents (DCDs), neither, or both, the scope of ITAAC development for a COL applicant will differ, as shown by the COL application scenarios above, and are dependent on the documents that are referenced in the COL application. **However, the COL applicant must propose a complete set of ITAAC that addresses the entire facility, including ITAAC on emergency planning and ITAAC on physical security hardware.** That is, the entire set of ITAAC for the facility as described in the COL application (i.e., COL-ITAAC) is comprised of the following ITAAC:

- a. Design Certification ITAAC (DC-ITAAC)
- b. Emergency Planning ITAAC (EP-ITAAC)
- c. Physical Security hardware ITAAC (PS-ITAAC)
- d. Site-specific ITAAC (SS-ITAAC)

The entire set of ITAAC for the facility described in a COL Application can be represented as follows:

$$COL$$
-ITAAC = (DC + EP + PS + SS) ITAAC

COL Application Scenarios 1 and 2

COL application scenarios 1 and 2, described above, requires the COL applicant to develop the same scope of ITAAC. That is, the COL applicant needs to develop design-ITAAC for the entire facility, including EP-ITAAC and PS-ITAAC. In these two scenarios, the design-ITAAC includes the equivalent ITAAC normally associated with certified designs and the site-specific design portions (not certified) of the facility. The applicable guidance for development of appropriate ITAAC for the design portions of the facility is provided in Section C.II.2 of this regulatory guide.

COL Application Scenario 3

COL application scenario 3, described above, requires the COL applicant to develop the same scope of ITAAC as in scenarios 1 and 2, with the exception of EP-ITAAC. The COL applicant in scenario 3 that references an ESP may only include the generic emergency planning (EP) ITAAC as described in Section C.I.13.3 of this regulatory guide. The EP-ITAAC may need to be modified, as necessary, by the COL applicant to accommodate any site-specific impacts to the emergency plan. For generic EP-ITAAC that have already been modified to accommodate site-specific impacts, further modifications may be necessary to incorporate site design specific impacts, as needed. In addition, the remaining ITAAC for the facility, including the physical security hardware, should be developed in accordance with the guidance contained Sections C.II.2 and C.I.13.6 of this regulatory guide.

COL Application Scenario 4

The COL application described in scenario 4, above, requires the COL applicant to develop ITAAC for the site specific design portions of the facility (SS-ITAAC) that are not included in the certified design. In addition, the COL applicant must develop and/or modify, as necessary, physical security ITAAC (PS-ITAAC) for the design and the facility (Note: some physical security ITAAC may have been included in the certified design that is referenced in the COL application). The COL applicant in scenario 4 that references an ESP should incorporate and modify, as necessary to accommodate site-specific impacts, the generic EP-ITAAC provided in Section C.I.13.3 of this regulatory guide. This will complete the entire set of facility ITAAC that is required for the COL application.

COL Application Scenario 5

The COL application described in scenario 5, above, requires the COL applicant to develop ITAAC for the site specific design portions of the facility (SS-ITAAC) that are not included in the certified design. In addition, the COL applicant must develop and/or modify physical security ITAAC (PS-ITAAC) for the design and the facility (Note: some physical security ITAAC may have been included in the certified design that is referenced in the COL application). Also, the COL applicant in this scenario may only have included the generic EP-ITAAC provided in Section C.I.13.3 of this regulatory guide as part of the ESP referenced in the application. These generic EP-ITAAC should be modified to accommodate site specific and design specific impacts. For generic EP-ITAAC that have already been modified to accommodate site-specific impacts, further modifications may be necessary to incorporate design specific impacts, as needed. This will complete the entire set of ITAAC for the facility that is required for the COL application.

Design Certification ITAAC (DC-ITAAC)

Design certification ITAAC correspond to the top level design and performance criteria established for a standard certified design. DC-ITAAC are found in the Tier 1 portion of the generic design control document (DCD) referenced in the appendix to 10 CFR Part 52 that is applicable to the certified design referenced in the COL application. As identified in *proposed* 10 CFR 52.80(b)(2), if the COL application references a standard certified design, the ITAAC contained in the certified design must apply to those portions of the facility design which are approved in the design certification. Certified designs do not typically include EP-ITAAC because site-specific features, which are not included in a certified design, must be considered in the development of emergency plans for the facility. A discussion on EP-ITAAC is provided later in this section and guidance for COL applicants on development and inclusion of EP-ITAAC is provided in Section C.I.13.3 of this regulatory guide. Some certified designs may also include physical security ITAAC, however, the requirements for including physical security aspects in standard certified designs have been a development-in-progress. In conjunction with these regulatory developments, guidance on the development of physical security ITAAC is also a development-in-progress. Further discussion on security ITAAC is provided later in this section and guidance on security ITAAC is provided in Section C.I.13.6.

As with any other requirement of a design certification, a COL applicant may seek an exemption from the NRC to modify an ITAAC included in the Tier 1 document in the DCD. The process for seeking exemption from a design certification requirement is discussed in Section VIII of the appendix to 10 CFR Part 52 that is applicable to the certified design referenced in the COL application. Further discussion and guidance on the change process associated with the information contained in a DCD is provided in Section C.IV.3 of this regulatory guide.

Site-specific ITAAC (SS-ITAAC)

Each system that is outside the scope of the standard certified design should be addressed by site-specific ITAAC (SS-ITACC). ITAAC should be developed for the site-specific systems which are designed to meet the interface requirements of the standard certified design. That is, the site-specific systems that are needed for operation of the plant (e.g., offsite power, circulating water system, etc.). The SS-ITAAC need not address ancillary buildings and structures on the site, such as administrative buildings, parking lots, warehouses, training facilities, etc.

Based upon the selection methodology identified by the COL applicant as per Section C.II.2 of this regulatory guide, the extent to which each site-specific system is included in an ITAAC should be dependent upon the importance of the functions performed by the system. In particular, a system with safety-related functions, safety-significant functions, or risk-significant functions should have entries in ITAAC for those functions. In contrast, for a site-specific system that does not have any functions that meet the Section C.II.2 screening criteria (e.g., cooling towers), the ITAAC table would not identify any specific inspections, tests or analyses and should simply state "No entry for this system."

SS-ITAAC should also be established, as appropriate, by the COL applicant that references a certified design, to demonstrate compliance with the **significant interface requirements**, if any, established in Tier 1 of the generic DCD. Interface requirements are required by 10 CFR § 52.47(b)(3) and are required to be verifiable through ITAAC by 10 CFR 52.47(b)(4). Tier 1 interface requirements describe the significant design provisions for interfaces between the certified design and structures, systems, and components of the facility that are wholly or partially outside the scope of the certified design. Tier 1 interface requirements also define the significant attributes and performance characteristics that the portion of the facility that is outside the scope of the design certification must have in order to support the in-scope (standard) portion of the design.

The extent of SS-ITAAC to be included in a COL application to address interface requirements will depend on which certified design is referenced in the application. For example, Section 4.0 of the DCD for the Advanced Boiling Water Reactor lists eight systems with Tier 1 interface requirements which must be addressed by a COL applicant referencing the ABWR certified design. They include, among other things, the capacity of the ultimate heat sink and voltage and frequency stability of the offsite power system.

In order to maintain consistency, the format and content of site-specific design ITAAC developed for a COL application should be similar to the design certification ITAAC that is included in the application. The ABWR Tier 1 Interface Requirements and sample ITAAC for the Ultimate Heat Sink (UHS) and offsite power system are identified in **Tables C.III.7-1 and C.III.7-2**. These ITAAC were established on a generic basis. As such, the COL applicant should provide more

specific acceptance criteria that reflect site-specific design information and/or site-specific features.

The complete set of ABWR Tier 1 interface requirements are identified in Table C.III.7-3.

In contrast, because the certified design for the AP1000 has passive safety functions and does not rely upon systems outside the scope of the certified design to perform any safety-related or safety significant functions, Tier 1 of the AP1000 DCD does not contain any interface requirements for site-specific elements of the facility outside the scope of the certified design. Therefore, because there are no Tier 1 interface requirements for the AP1000, the set of ITAAC required for a COL application referencing the AP1000 certified design would consist only of those ITAAC from the design certification plus ITAAC on emergency planning and physical security hardware. Provided no site-specific system function meets the criteria specified in Section 14.3 of the AP 1000 DCD, there would be no site-specific design ITAAC in a COL application referencing the AP1000 design certification.

Site specific design ITAAC are proposed by the COL applicant and are subject to NRC review and a hearing with respect to whether they satisfy the "necessary and sufficient" requirement of 10 CFR 52.80(b). The complete set of COL-ITAAC will be incorporated into the COL as a license condition to be satisfied prior to fuel load. As such, a COL holder may request a change in one or more of the site-specific design ITAAC via the license amendment process applicable to Part 52.

Emergency Planning ITAAC (EP-ITAAC)

COL applications must include ITAAC on emergency planning, as required by the Energy Policy Act (EPACT) of 1992 and conforming Part 52 amendments. This requirement responds to the singularly contentious and disruptive role played by the late treatment of emergency planning issues in operating license proceedings on completed Part 50 facilities. The requirements for inclusion of ITAAC in an ESP are specific to emergency planning ITAAC (EP-ITAAC) and are contained in *proposed* 10 CFR 52.17(b)(3). The requirements for including EP-ITAAC in a COL application are contained in *proposed* 10 CFR 52.80(b). In SRM-SECY-05-0197, the NRC Commission approved emergency planning ITAAC for use in combined license applications. In this SRM, the Commission approved a set of generic EP-ITAAC for use by ESP and COL applicants and these generic EP-ITAAC are contained in Section C.I.13.3 of this regulatory guide.

The scope and general content of the generic EP-ITAAC approved in SRM-SECY-05-0197 and that should be included in a COL application was established through a series of industry – NRC interactions. These EP-ITAAC were established on a generic basis; they are not associated with any particular site or design. As such, several of the generic EP-ITAAC require the COL

applicant to provide more specific acceptance criteria that reflect the plant-specific design and site-specific emergency response plans and facilities. These generic EP-ITAAC are included in Section C.I.13.3 of this regulatory guide.

The generic EP-ITAAC represent the complete scope of EP-ITAAC required for a COL application, including ITAAC on emergency response facilities that are within the scope of the design certification. COL applications referencing a certified design must include the design certification ITAAC on emergency response facilities.

EP-ITAAC are proposed by the COL applicant and, except for EP-ITAAC from the referenced design certification or ESP, are subject to NRC review and a hearing with respect to whether they satisfy the "necessary and sufficient" requirement of 10 CFR 52.80(b). The complete set of COL-ITAAC will be incorporated into the COL as a license condition to be satisfied prior to fuel load. As such, a COL holder may request a change in one or more of the EP-ITAAC, except those provided in the referenced certified design, via the license amendment process applicable to Part 52.

Physical Security ITAAC (PS-ITAAC)

COL applicants must include physical security ITAAC as part of the COL-ITAAC that are required in the COL license application. Certified designs have typically included very minimal or no information related to physical security features of the design, however, any physical security hardware ITAAC contained in a DCD must be included in a COL application that references a DCD and should be supplemented, as necessary. In addition, in SRM-SECY-05-0120, the Commission provided direction to the staff to proceed with rulemaking to establish security design requirements for new reactor licensing (i.e., in certified designs). Several security related rulemakings are in progress and it is expected that further guidance related to the development of physical security ITAAC will be developed in conjunction with these security rulemakings. At the present time, the staff anticipates that a set of generic physical security ITAAC that may be modified by each COL applicant to accommodate site-specific design impacts and site-specific features, similar to the EP-ITAAC approach, will be proposed for future NRC endorsement. COL applications that do not reference a certified design must develop the entire set of PS-ITAAC for the facility. The following discussion assumes that a generic PS-ITAAC approach would be endorsed by the NRC and is similar to the approach for EP-ITAAC.

The generic PS-ITAAC represent the complete scope of PS-ITAAC required for a COL application, including ITAAC on physical security features that are within the scope of the design certification. COL applications referencing a certified design must include the design certification ITAAC on physical security features.

PS-ITAAC are proposed by the COL applicant and, except for PS-ITAAC from the referenced

design certification, are subject to NRC review and a hearing with respect to whether they satisfy the "necessary and sufficient" requirement of 10 CFR 52.80(b). The complete set of COL-ITAAC will be incorporated into the COL as a license condition to be satisfied prior to fuel load. As such, a COL holder may request a change in one or more of the PS-ITAAC, except those provided in the referenced certified design, via the license amendment process applicable to Part 52

Terminology

Definitions of terminology used in certified designs are provided in the specific appendices of Part 52 which are applicable to the certified design. The certified design terminology such as generic DCD, plant-specific DCD, Tier 1, Tier 2*, and Tier 2 are not applicable to COL applications that do not reference a certified design. As such, these terms do not have any meaning for a COL application that does not reference a certified design.

The COL application references a certified design must incorporate the entire DCD, and therefore, the terms above have significant meaning for the certified design portion of the COL application. ITAAC for the certified design are included in the Tier 1 portion of the DCD. However site-specific ITAAC, emergency planning ITAAC, and physical security ITAAC that are developed as part of the COL application are not contained in a document similar to the Tier 1 document. The significance of the terminology denotes the origin of information and the origin of the information contained in the COL application determines the change process that applies to the information. The change process for COL application information that originates in a DCD is governed by Section VIII of the appendix of 10 CFR Part 52 that is applicable to the certified design. For COL information the does not originate in a DCD, a separate change process applies. More detailed guidance on the change processes applicable to COL applicants is provided in Section C.IV.3 of this regulatory guide.

In addition, as the terminology associated with the ITAAC denotes is origin, the origin of the ITAAC will also determine the "active life" of the ITAAC. The ITAAC for the entire facility (COL-ITAAC) will be subject to a license condition that requires successful completion of the ITAAC to obtain Commission approval for fuel load. Compliance with that license condition renders the ITAAC inactive (i.e., the ITAAC have been successfully completed and are no longer applicable as they are a one-time requirement). However, because ITAAC contained in the DCD have been codified by rulemaking in appendices to Part 52, they will not be removed from the rule following completion by a COL applicant.

COL applicants that reference a certified design should seek to use terminology and definitions in the development of ITAAC that are consistent with that used in the Tier 1 information included in the certified design. For example, the term "basic configuration" used in the ABWR certified design and "functional arrangement" used in the AP1000 certified design, although apparently

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similar, have very different definitions. COL applicants developing site-specific ITAAC should thoroughly consider the use of appropriate definitions for their site-specific ITAAC. "Basic configuration" for a system, as used in an ITAAC, includes verifying the functional arrangement, verifications of welding, environmental qualification, seismic qualification, and motor-operated valves. "Functional arrangement" for a system, as used in an ITAAC, includes verification that the system is constructed as depicted in the Tier 1 design drawings, including equipment and instrument location. Additional guidance on ITAAC terminology is provided in Section C.II.2 of this regulatory guide.

Table C.III.7-1 ULTIMATE HEAT SINK

ABWR Tier 1 Interface Requirement	Draft Generic ITAAC			
	Design Requirement	Inspections, Tests, Analyses	Acceptance Criteria	
(a) Provide cooling water to the RSW system for normal plant operation and to permit safe shutdown and cooldown of the plant and maintain the plant in a safe shutdown condition for design basis events. (Interface 4.1(1))	1.(a) The UHS has sufficient cooling water to supply the RSW system for normal plant operation and to permit safe shutdown and cooldown of the plant and maintain the plant in a safe shutdown condition for design basis events.	Inspections will be performed of the configuration of the UHS.	1.(a) The suction lines from the UHS are located at elevation	
(b) Makeup water to the UHS shall not be required for at least 30 days following a design basis accident. (Interface 4.1(2))	1.(b) Makeup water to the UHS shall not be required for at least 30 days following a design basis accident.		1.(b) The minimum surface area and capacity of the UHS above the suction lines are, respectively. [Note: ITAAC (b) is only needed for those UHS that do not utilize natural bodies of water].	
Any active safety-related SSCs within the UHS shall have 3 divisions powered by their respective Class 1E divisions. Each division shall be physically separated and electrically independent of the other divisions. (Interface 4.1(3))	2.(a) Active safety-related SSCs within the UHS shall have 3 divisions powered by their respective Class 1E divisions. 2.(b) Each division shall be physically separated and	2.(a) Tests will be performed on the UHS System by providing a test signal to only one Class 1E division at a time. 2.(b) Inspections of the as-built UHS mechanical system components shall be performed	2.(a) The test signal exists in only the Class 1E division under test in the UHS system. 2.(b) Each mechanical division of the UHS system is physically separated from other mechanical divisions of the UHS system by structural and/or fire barriers.	

Table C.III.7-1 ULTIMATE HEAT SINK

ABWR Tier 1 Interface Requirement	Draft Generic ITAAC		
	Design Requirement	Inspections, Tests, Analyses	Acceptance Criteria
	2.(c) electrically independent of the other divisions. [Note: this ITAAC is not needed if there are no active safety-related SSCs in the UHS.]	2.(c) Inspections of the as-built UHS electrical system components shall be performed.	2.(c) Electrical isolation exists between Class 1E divisions.
UHS system divisions A and B components shall have control interfaces with the Remote Shutdown System (RSS) as required to support UHS operation during RSS design basis conditions. (Interface 4.1(4))	3. Displays and controls in the main control room and RSS are provided for required functions of the UHS system.	3. Inspections will be performed on the main control room and RSS displays and controls for the UHS system.	3. Displays and controls exist in the main control room and RSS sufficient to support UHS operation during remote shutdown design basis conditions. [The COL applicant will identify the specific displays and controls.]
{The UHS shall] be classified as Seismic Category 1. (Interface 4.1(5))	4. The UHS is able to withstand the structural design basis loads. [Note: this only applies to onsite man-made features of the UHS, and does not apply to natural features, such as oceans, lakes, and rivers.]	4. A structural analysis will be performed which reconciles the as-built data with the structural design basis.	4. A structural analysis exists which concludes that the as-built UHS is able to withstand the structural design basis loads.

Table C.III.7-2 Off-Site Power System

ABWR Tier 1 Interface Requirement	Draft Generic ITAAC			
	Design Requirement	Inspections, Tests, Analyses	Acceptance Criteria	
A minimum of 2 independent offsite transmission circuits from the transmission network (TN)	There is redundancy and independence in the offsite power system.	1.(a) Inspections of the as-built offsite power supply transmission system will be performed. 1.(b) Tests of the as-built offsite power system will be conducted by providing a test signal in only one offsite power circuit/system at a time.	1.(a)(i) Two or more offsite transmission circuits exist. (ii)The offsite transmission circuits are separated by a minimum distance of (iii) The offsite transmission lines do not have a common takeoff structure or use a common structure for support. 1.(b) A test signal exists in only the circuit under test.	
Voltage variations of the offsite TN during steady state operation shall not cause voltage variations at the loads of more than plus or minus 10% of the loads nominal ratings	Site loads are protected from offsite voltage variations during steady state operation.	2. Analyses of TN voltage variability and steady state load requirements for as-built SSCs will be performed.	2. A report exists which concludes that voltage variations of the offsite TN during steady state operation will not cause voltage variations at the loads of more than plus or minus 10% of the loads nominal ratings.	
The normal steady state frequency of the offsite TN shall be within plus or minus 2 hertz of 60 hertz during recoverable periods of system instability.	3. Site loads are protected from offsite frequency variations.	3. Analyses of as-built site loads on the TN and TN frequency variability during normal steady state conditions and periods of instability will be performed.	3. A report exists which concludes that the normal steady state frequency of the offsite TN will be within plus or minus 2 hertz of 60 hertz during recoverable periods of system instability.	

Table C.III.7-2 Off-Site Power System

ABWR Tier 1 Interface Requirement	Draft Generic ITAAC			
	Design Requirement	Inspections, Tests, Analyses	Acceptance Criteria	
The offsite transmission circuits from the TN through and including the main step-up power transformers and RATs shall be sized to supply their load requirements, during all design operating modes, of their respective Class 1E divisions and non-Class 1E load groups.	4. The offsite power system is adequately sized to supply necessary load requirements, during all design operating modes.	4. Analyses of the as-built 1E divisions and non-Class 1E load groups will be performed to determine their load requirements during all design operating modes.	4. A report exists which concludes that the offsite transmission circuits from the TN through and including the main step-up power transformers and RATs are sized to supply their load requirements, during all design operating modes, of their respective Class 1E divisions and non-Class 1E load groups.	
The impedance of the main step-up transformer and RATs shall be compatible with the interrupting capability of the plant's circuit interrupting devices.	5. The impedance of the offsite power system shall be compatible with interrupting capability of the plant's circuit interrupting devices.	5. Analyses of the impedance of the as-built main step-up transformer and RATs will be performed.	5. A report exists which concludes that the impedance of the main step-up transformer and RATs are compatible with the interrupting capability of the plant's circuit interrupting devices.	
The independence of offsite transmission power, instrumentation, and control circuits shall be compatible with the portion of the offsite transmission power, instrumentation, and control circuits with GE's design scope.	6. The offsite transmission power, instrumentation and control circuits are independent.	6. Tests of the as-built offsite power, instrumentation, and control system will be conducted by providing a test signal in only one offsite power circuit/system at a time.	6. A test signal exists in only the circuit under test.	

I	Instrumentation and control system loads	7. Instrumentation and	7. Analyses of offsite power control	7. A repo
	shall be compatible with the capacity and	control system loads shall	system and instrumentation loads	that the
	capability design requirements of DC	be compatible with the	shall be conducted.	system a
	systems within GE's design scope.	capacity and capability		are com
		design ramts of the DC		and capa
		systems.		

Table C.III.7-3 ABWR TIER 1 INTERFACE REQUIREMENTS

1. Ultimate Heat Sink

- (a) Provide cooling water to the RSW system for normal plant operation and to permit safe shutdown and cooldown of the plant and maintain the plant in a safe shutdown condition for design basis events.
- (b) Makeup water to the UHS shall not be required for at least 30 days following a design basis accident.
- (c) Any active safety-related SSCs within the UHS shall have 3 divisions powered by their respective Class 1E divisions. Each division shall be physically separated and electrically independent of the other divisions.
- (d) UHS system divisions A and B components shall have control interfaces with the Remote Shutdown System (RSS) as required to support UHS operation during RSS design basis conditions.
- (e) Be classified as Seismic Category 1.

6. Offsite Power System (Table 2-1)

- a. A minimum of 2 independent offsite transmission circuits from the transmission network (TN)
- b. Voltage variations of the offsite TN during steady state operation shall not cause voltage variations at the loads of more than plus or minus 10% of the loads nominal ratings
- c. The normal steady state frequency of the offsite TN shall be within plus or minus 2 hertz of 60 hertz during recoverable periods of system instability.
- d. The offsite transmission circuits from the TN through and including the main step-up power transformers and RATs shall be sized to supply their load requirements, during all design operating modes, of their respective Class 1E divisions and non-Class 1E load groups.
- e. The impedance of the main step-up transformer and RATs shall be compatible with the interrupting capability of the plant's circuit interrupting devices.
- f. The independence of offsite transmission power, instrumentation, and control circuits shall be compatible with the portion of the offsite transmission power, instrumentation, and control circuits with GE's design scope.
- g. Instrumentation and control system loads shall be compatible with the capacity and capability design requirements of DC systems within GE's design scope.

4. Makeup Water Preparation System

(a) Makeup water supply to the makeup water purified system (MUWP).

6. Reactor Service Water System

- (a) Design features to limit maximum flooding height to 5 meters in each RCW heat exchanger room
- (b) The design shall have three physically separated divisions. Each division shall be powered by its respective Class 1E division. Each division shall be capable of removing the design heat capacity of the RCW heat exchangers in that division. Any structures housing RSW components shall have interdivisional boundaries (walls, floors, doors, and penetrations) with a three hour fire rating.

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Table C.III.7-3 ABWR TIER 1 INTERFACE REQUIREMENTS

Interdivisional flood control shall be provided to preclude flooding in more than one division.

- (c) Upon receipt of a LOCA signal, components in the standby mode shall start and/or realign to the operating mode.
- (d) RSW Divisions A and B shall have control interfaces with the RSS as required to support RSW operation during RSS design basis conditions.
- (e) If required by the elevation relationships between the UHS and RWS system components in the Control Building (CB), the RSW system shall have antisiphon capability to prevent a CB flood after an RSW system break and after the RSW pumps have stopped.
- (f) RSW system pumps in any division shall be tripped on receipt of a signal indicating flooding in that division of the CB basement.
- (g) Any tunnel structures used to route the RSW system piping to the CB shall be Seismic Category
- 1. Tunnel flooding due to site flood conditions shall be precluded.

5. Communication System

(a) Offsite emergency communication

6. Site Security (none specified)

7. Circulating Water System

(a) Design features to limit flooding in the turbine building

8. Heating, Ventilating and Air Conditioning Systems

- (a) Control Room habitability area HVAC system toxic gas monitoring
- (b) Clean Area HVAC system toxic gas monitoring

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