



U.S. NUCLEAR REGULATORY COMMISSION
STANDARD REVIEW PLAN

3.6.1 PLANT DESIGN FOR PROTECTION AGAINST POSTULATED PIPING FAILURES IN FLUID SYSTEMS OUTSIDE CONTAINMENT

REVIEW RESPONSIBILITIES

Primary - Organization responsible for the review of cooling water systems associated with the balance of plant

Secondary - None

I. AREAS OF REVIEW

The plant design for protection against piping failures outside containment is reviewed to ensure that environmental effects of such failures would not cause the loss of needed functions of safety-related systems and to ensure that the plant could be safely shut down in the event of such failures. The review includes high energy and moderate energy fluid system piping located outside of containment. If such a system penetrates containment (except for the auxiliary feedwater system) the review starts with the first isolation valve outside of containment. The review boundary for auxiliary feedwater systems extends either to the steam generator or to the feedwater (or steam) line, as appropriate. This section includes a reviews of the plant design to ensure conformance with the requirements of 10 CFR 52.47(b)(1), 10 CFR 52.80(a), and 10 CFR Part 50, Appendix A, General Design Criteria (GDC) 2, and GDC 4.

The specific areas of review are as follows:

1. Reviews of the general layout of high and moderate energy piping systems with respect to the plant arrangement criteria of Section B.1. of Branch Technical Position (BTP) SPLB 3-1, which is attached to this Standard Review Plan (SRP) section. Three

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USNRC STANDARD REVIEW PLAN

This Standard Review Plan, NUREG-0800, has been prepared to establish criteria that the U.S. Nuclear Regulatory Commission staff responsible for the review of applications to construct and operate nuclear power plants intends to use in evaluating whether an applicant/licensee meets the NRC's regulations. The Standard Review Plan is not a substitute for the NRC's regulations, and compliance with it is not required. However, an applicant is required to identify differences between the design features, analytical techniques, and procedural measures proposed for its facility and the SRP acceptance criteria and evaluate how the proposed alternatives to the SRP acceptance criteria provide an acceptable method of complying with the NRC regulations.

The standard review plan sections are numbered in accordance with corresponding sections in Regulatory Guide 1.70, "Standard Format and Content of Safety Analysis Reports for Nuclear Power Plants (LWR Edition)." Not all sections of Regulatory Guide 1.70 have a corresponding review plan section. The SRP sections applicable to a combined license application for a new light-water reactor (LWR) are based on Regulatory Guide 1.206, "Combined License Applications for Nuclear Power Plants (LWR Edition)."

These documents are made available to the public as part of the NRC's policy to inform the nuclear industry and the general public of regulatory procedures and policies. Individual sections of NUREG-0800 will be revised periodically, as appropriate, to accommodate comments and to reflect new information and experience. Comments may be submitted electronically by email to NRR_SRP@nrc.gov.

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arrangement situations are covered by the criteria and all three may be encountered in a single plant. They are:

- a. Arrangements where protection of safety-related plant features is provided by separation of high and moderate energy systems from essential systems and components.
 - b. Arrangements where protection of safety-related plant features is provided by enclosing either the high and moderate energy systems or the safety-related features in protective structures.
 - c. Arrangements where neither separation nor protective enclosures are practical and special protective measures are taken to ensure the operability of safety-related features.
2. Review of portions of high and moderate energy fluid system piping between containment isolation valves that are subject to the recommendations of item B.2.c. of BTP SPLB 3-1.
 3. Review of analyses and environmental effects of postulated piping failures with respect to the guidelines of Section B.3. of BTP SPLB 3-1.
 4. Reviews of the assumptions made in the analyses with regard to:
 - a. The availability of offsite power.
 - b. The failure of a single active component in systems used to mitigate the consequences of the piping failure.
 - c. The special provisions applicable to certain dual purpose systems.
 - d. The use of available systems to mitigate the consequences of the piping failure.
 5. Review of the effects of postulated failures on the habitability of the control room and access to areas important to safe control of post-accident operations.
 6. Review of the effects of piping failures in systems not designed to seismic Category I standards on essential systems and components.
 7. Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC). For design certification (DC) and combined license (COL) reviews, the staff reviews the applicant's proposed ITAAC associated with the structures, systems, and components (SSCs) related to this SRP section in accordance with SRP Section 14.3, "Inspections, Tests, Analyses, and Acceptance Criteria." The staff recognizes that the review of ITAAC cannot be completed until after the rest of this portion of the application has been reviewed against acceptance criteria contained in this SRP section. Furthermore, the staff reviews the ITAAC to ensure that all SSCs in this area of review are identified and addressed as appropriate in accordance with SRP Section 14.3.
 8. COL Action Items and Certification Requirements and Restrictions. For a DC application, the review will also address COL action items and requirements and restrictions (e.g., interface requirements and site parameters).

For a COL application referencing a DC, a COL applicant must address COL action items (referred to as COL license information in certain DCs) included in the referenced

DC. Additionally, a COL applicant must address requirements and restrictions (e.g., interface requirements and site parameters) included in the referenced DC.

Review Interfaces

Other SRP sections interface with this section as follows:

1. The acceptability of seismic classification is evaluated in accordance with SRP Sections 3.2.1 and 3.2.2.
2. The acceptability of design of protective structures (such as those used for protection against piping failures) in connection with the review of other Category I structures is evaluated in accordance with SRP Section 3.8.4.
3. The acceptability of the locations and types of piping failures to be considered, the design of piping restraints and other protective measures, and the resultant dynamic effects is evaluated in accordance with SRP Section 3.6.2.
4. The adequacy of internal flood protection system from piping failures is evaluated in accordance with SRP Section 3.4.1.
5. The evaluation of the environmental effects of pipe rupture, (e.g., temperature, humidity, and spray-wetting) with respect to the functional performance of essential electrical equipment and instrumentation is in accordance with SRP Section 3.11.
6. Review of leak-before-break technology to exclude the dynamic effects of postulated pipe ruptures from the design basis of plant SSCs is in accordance with SRP Section 3.6.3.
7. The acceptability of inservice inspection criteria of piping within protective structures or guard pipes, between containment isolation valves is evaluated in accordance with SRP Section 6.6.
8. The acceptability of environmental effects of piping failures inside containment is evaluated in accordance with SRP Sections 6.2.1 and 3.11.

The specific acceptance criteria and review procedures are contained in the referenced SRP sections.

II. ACCEPTANCE CRITERIA

Requirements

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

1. 10 CFR Part 50, Appendix A, GDC 2, as it relates to protection against natural phenomena, such as seismically-induced failures of non-seismic piping. The application of 10 CFR Part 50, Appendix A, GDC 2 to this section is to incorporate environmental effects of full-circumferential ruptures of non-seismic moderate energy piping in areas where effects are not already bounded by failures of high energy piping. Acceptance is based on conformance to BTP SPLB 3-1, which is attached to this SRP Section.

2. GDC 4, as it relates to SSCs important to safety being designed to accommodate the effects of and to be compatible with the environmental conditions associated with postulated pipe rupture. Acceptance is based on conformance to BTP SPLB 3-1.
3. 10 CFR 52.47(b)(1), which requires that a DC application contain the proposed inspections, tests, analyses, and acceptance criteria (ITAAC) that are necessary and sufficient to provide reasonable assurance that, if the inspections, tests, and analyses are performed and the acceptance criteria met, a plant that incorporates the design certification is built and will operate in accordance with the design certification, the provisions of the Atomic Energy Act, and the NRC's regulations;
4. 10 CFR 52.80(a), which requires that a COL application contain the proposed inspections, tests, and analyses, including those applicable to emergency planning, that the licensee shall perform, and the acceptance criteria that 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 NRC's regulations.

SRP Acceptance Criteria

Specific SRP acceptance criteria acceptable to meet the relevant requirements of the NRC's regulations identified above are as follows for the review described in this SRP section. The SRP is not a substitute for the NRC's regulations, and compliance with it is not required. However, an applicant is required to identify differences between the design features, analytical techniques, and procedural measures proposed for its facility and the SRP acceptance criteria and evaluate how the proposed alternatives to the SRP acceptance criteria provide acceptable methods of compliance with the NRC regulations.

Technical Rationale

The technical rationale for application of these acceptance criteria to the areas of review addressed by this SRP section is discussed in the following paragraphs:

1. Compliance with 10 CFR Part 50, Appendix A, GDC 2 requires that SSCs important to safety be designed to withstand the effects of natural phenomena such as earthquakes, tornadoes, hurricanes, floods, tsunamis, and seiches without loss of capability to perform their safety function.

Meeting the requirements of 10 CFR 50, Appendix A, GDC 2 is necessary to ensure that environmental effects due to failures of non-seismic piping do not affect the ability of the plant to shut down safely and remain in safe shutdown condition. The application of 10 CFR 50, Appendix A, GDC 2 to this SRP Section is to ensure that consideration is given to full-circumferential ruptures of non-seismic moderate energy piping. Such ruptures are not postulated for dynamic considerations under SRP Section 3.6.2 since that section only applies for normal plant conditions, not seismic events; however, environmental effects from these ruptures should be considered. In many cases, the limiting bound on environmental effects will be from failures of high-energy piping in the same area. However, the applicant should consider the effects on safety-related SSCs in areas where moderate energy failures may be the source of the most extreme postulated environmental effects.

2. Compliance with 10 CFR Part 50, Appendix A, GDC 4 requires that SSCs important to safety shall be designed to accommodate the effects of, and be compatible with, environmental conditions associated with normal operations, maintenance, testing, and postulated accidents, including loss-of-coolant accidents. These SSCs should be appropriately protected against dynamic effects (including those of missiles, pipe whipping, and discharge fluids) that may result from equipment failures and from events outside the nuclear power unit. However, dynamic effects associated with postulated pipe ruptures in nuclear power units may be excluded from the design basis when analyses reviewed and approved by the Commission demonstrate that the probability of fluid system piping rupture is extremely low under conditions consistent with the design basis for piping.

10 CFR Part 50, Appendix A, GDC 4 requirements are applicable to this SRP section because the reviewer verifies that a suitable and controlled operating environment will be provided for SSCs during normal operations, during anticipated operational occurrences, and during and after postulated accidents, including loss-of-coolant accidents. These requirements are imposed to ensure (a) that piping failures in fluid systems outside the containment will not cause the loss of needed function in safety-related systems and (b) that the plant could be safely shut down in the event of such a failure.

Meeting the requirements of 10 CFR Part 50, Appendix A, GDC 4 provides assurance that safety-related SSCs will be able to maintain their safety-related functions in the environmental conditions resulting from a postulated piping failure.

III. REVIEW PROCEDURES

The reviewer will select material from the procedures described below, as may be appropriate for a particular case.

These review procedures are based on the identified SRP acceptance criteria. For deviations from these acceptance criteria, the staff should review the applicant's evaluation of how the proposed alternatives provide an acceptable method of complying with the relevant NRC requirements identified in Subsection II.

All the systems of concern in this section have been reviewed under other SRP sections with respect to design functions for normal operation and for the prevention or mitigation of accidents. The review under this SRP section does not deal with individual system design criteria necessary to ensure that each system performs as intended, but rather considers the protection necessary to ensure the operation of such systems in the event of nearby piping failures.

The review procedure consists of:

1. A review of the information presented in the Safety Analysis Report (SAR) identifying all high and moderate energy fluid systems, and verification of individual system temperatures and pressures to ensure that they have been correctly identified. The reviewer evaluates for adequacy the system descriptions of the high and moderate energy piping runs and by reviewing the appropriate system arrangement and piping drawings, examine the plant arrangement measures that were taken to ensure protection from the effects of postulated pipe breaks of high energy systems and non-seismic moderate energy systems, or of leakage cracks for seismically-designed

moderate energy systems. The reviewer will determine from the SAR that the following configurations, either by itself or in combination, have been used by the applicant to achieve this protection:

- a. High and moderate energy fluid systems are separated from essential systems and components, as described in Appendix B to BTP SPLB 3-1. The reviewer inspects plant arrangement drawings and other information to verify conformance to Appendix B to BTP SPLB 3-1.
 - b. High and moderate energy fluid systems, or portions thereof, are enclosed within structures or compartments designed to protect nearby essential systems or components, or the essential systems and components are enclosed in protective structures. The reviewer traces the routing of the systems identified in the SAR as high or moderate energy systems on appropriate plant arrangement drawings, locates the postulated break locations specified in the applicant's analyses, and determines all locations where the effects from the breaks or leaks interface with safety-related equipment. The reviewer then determines that at these locations enclosures have been provided that protect the safety-related equipment. Any questions related to the location of the break are conveyed to the organization responsible for the review of SRP Section 3.6.2 for a determination of the proper locations.
 - c. For cases where neither physical separation nor protective enclosures are considered practical by the applicant, the reviewer will analyze the SAR information to verify the following:
 - i. The reasons for which the applicant judged both physical separation and system enclosure to be impractical as means of protection are consistent with item B.1.c. of BTP SPLB 3-1.
 - ii. Redundant design features or additional protections (assuming a single active failure in any required system) have been provided such that failure modes and effects analyses for all failure situations ensure the performance of safety features. These analyses are done under the criteria and assumptions of item B.3. of BTP SPLB 3-1. Special measures taken to provide additional protection are reviewed on a case by case basis, with assistance from other staff as needed.
2. Review the information presented in the SAR that identifies the principal design features. The reviewer performs the evaluation by comparing the design basis information given in the SAR with that described in item B.2. of BTP SPLB 3-1. By this comparison of individual design features, the reviewer verifies that the following necessary measures have been provided by the applicant's design.
- a. Design features provided for protective structures or compartments and other protective measures are reviewed as described in item B.2.b. of BTP SPLB 3-1. The reviewer compares the design features and bases given in the SAR with the stated item in BTP SPLB 3-1. The comparative review may include the use of plant arrangement and layout drawings as necessary to clarify the design intentions and implementation. In the majority of case reviews, SAR statements and drawings indicating that the design meets the intent of the acceptance criteria are accepted. However, there may be cases where engineering

judgment and independent staff analyses are needed to verify the capability of structures and components to withstand the effects of a pipe rupture.

- b. SAR information, as supplemented by engineering sketches or drawings where necessary, is reviewed to determine that fluid system piping between containment isolation valves conforms to item B.2.c. of BTP SPLB 3-1. This includes piping penetrations between single and dual barrier containments that may have enclosing protective structures. The review is mainly performed on a comparative basis in this SRP Section. These piping details are reviewed to verify the design limits, break locations, and dynamic effects under SRP Section 3.6.2 and the attached Appendix A of SRP Section 3.6.2.
3. The results of the applicant's evaluation of the environmental consequences of postulated piping failures of high and moderate energy fluid piping systems are reviewed. The type and location of each postulated piping failure (i.e., longitudinal or circumferential) in either a high or moderate energy system will be reviewed by the organization responsible for the mechanical engineering reviews on the basis of Appendix A of SRP Section 3.6.2; however, full-circumferential breaks in non-seismic moderate energy piping should be considered in addition to the breaks postulated in Appendix A of SRP Section 3.6.2. The review will be based upon the information provided by applicants in the SAR concerning the effects of postulated failures on essential equipment and the ability of the plant to be safely shut down, as described in item B.3. of BTP SPLB 3-1.

The reviewer verifies that the applicant's evaluation has properly considered the following points, and in certain cases, as necessary, performs an independent evaluation, especially with regard to single failure analyses.

- a. The reviewer verifies the applicant's plant arrangements and design features using layout drawings to ensure that all potentially affected essential systems and components have been considered with respect to the effects of an assumed pipe break.
- b. The reviewer evaluates the effects of postulated piping failures as determined from the information given in the SAR. The reviewer will confirm the results of the applicant's evaluations by performing a comparative, but abbreviated as appropriate, failure modes and effects analysis that includes the considerations given in item B.3.b. of BTP SPLB 3-1 for the following effects:
 - i. The availability of offsite power.
 - ii. The effects of a single active component failure in systems necessary to mitigate consequences of the postulated piping break.
 - iii. Permissible exclusions to (ii.) above based upon the provision given in item B.3.b.(3) of BTP SPLB 3-1 for certain dual purpose moderate energy systems.
 - iv. The considerations involved in the selection of available systems to mitigate the consequences of the piping failure.

- c. The reviewer will verify from a review of arrangement drawings that control room habitability or access to necessary surrounding areas is not jeopardized as a consequence of the postulated piping failure.
 - d. The reviewer evaluates the applicant's analysis of the postulated failure of non-seismic Category I piping systems by performing a failure modes and effects analysis using SAR information and engineering sketches as necessary.
4. Systems defined in Appendix A to BTP SPLB 3-1 as "essential systems" are those that are needed to shut down the reactor and mitigate the consequences of the pipe break for a given postulated piping break without offsite power. However, depending upon the type and location of the postulated pipe break, certain safety equipment may not be classified as "essential" for that particular event (e.g., emergency power system or high and low pressure core spray systems). On the other hand, some safety equipment will be "essential" for almost all cases (e.g., service water to ultimate heat sink). Table 3.6.1-1 is a list of those essential systems generally in the latter category.
5. For review of a DC application, the reviewer should follow the above procedures to verify that the design, including requirements and restrictions (e.g., interface requirements and site parameters), set forth in the final safety analysis report (FSAR) meets the acceptance criteria. DCs have referred to the FSAR as the design control document (DCD). The reviewer should also consider the appropriateness of identified COL action items. The reviewer may identify additional COL action items; however, to ensure these COL action items are addressed during a COL application, they should be added to the DC FSAR.

For review of a COL application, the scope of the review is dependent on whether the COL applicant references a DC, an ESP or other NRC approvals (e.g., manufacturing license, site suitability report or topical report).

For review of both DC and COL applications, SRP Section 14.3 should be followed for the review of ITAAC. The review of ITAAC cannot be completed until after the completion of this section.

TABLE 3.6.1-1

SYSTEMS USUALLY REQUIRED FOR SAFE SHUTDOWN

<u>PWR</u>	<u>BWR</u>
Service Water System	Service Water System
Auxiliary Feedwater System	Reactor Coolant Injection System
Volume Control System	Automatic Depressurization System
Decay Heat Removal System	Residual Heat Removal System
Component Cooling Water System	Component Cooling Water System (if provided)

Table 3.6.1-2 is a listing of systems typically classified as either high or moderate energy systems that are located outside the primary containment in pressurized water reactor (PWR) and boiling water reactor (BWR) plants.

TABLE 3.6.1-2

TYPICAL HIGH ENERGY SYSTEMS OUTSIDE CONTAINMENT

<u>PWR</u>	<u>BWR</u>
Main Steam Line System	Main Steam Line System
Main Feedwater Line System	Main Feedwater Line System
Auxiliary Feedwater System	High Pressure Core Spray System
Volume Control System	Process Sampling System
Process Sampling System	Condensate System
Condensate System	Reactor Cleanup System
Steam Generator Blowdown Line	Standby Liquid Control System

TYPICAL MODERATE ENERGY SYSTEMS OUTSIDE CONTAINMENT

<u>PWR</u>	<u>BWR</u>
Service Water System	Service Water System
Decay Heat Removal System (outside of reactor coolant pressure boundary)	Residual Heat Removal System (outside of reactor coolant pressure boundary)
Circulating Water System	Circulating Water System
Fire Protection System	Fire Protection System
Component Cooling Water System	Component Cooling Water System

IV. EVALUATION FINDINGS

The reviewer verifies that the applicant has provided sufficient information and that the review and calculations (if applicable) support conclusions of the following type to be included in the staff's safety evaluation report. The reviewer also states the bases for those conclusions.

The review of the plant design for protection against postulated piping failures outside containment included all high and moderate energy piping systems located outside containment. The review of these high and moderate energy systems for the _____ plant included layout drawings, piping and instrumentation diagrams, and descriptive information.

The staff concludes that the facility design for protection against postulated piping failures outside containment is acceptable and therefore meets the requirements of 10 CFR Part 50, Appendix A, GDC 2, GDC 4, 10 CFR 52.47(b)(1), and 10 CFR 52.80(a) with respect to accommodating the environmental effects of postulated pipe ruptures. The applicant has met the requirement of GDC 2 by considering the environmental effects from the rupture of non-seismic piping, and the applicant has met the requirement of GDC 4 with respect to postulated pipe ruptures by conforming to BTP SPLB 3-1.

For DC and COL reviews, the findings will also summarize the staff's evaluation of requirements and restrictions (e.g., interface requirements and site parameters) and COL action items relevant to this SRP section.

In addition, to the extent that the review is not discussed in other SER sections, the findings will summarize the staff's evaluation of the ITAAC, including design acceptance criteria, as applicable.

V. IMPLEMENTATION

The staff will use this SRP section in performing safety evaluations of DC applications and license applications submitted by applicants pursuant to 10 CFR Part 50 or 10 CFR Part 52. Except when the applicant proposes an acceptable alternative method for complying with specified portions of the Commission's regulations, the staff will use the method described herein to evaluate 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, unless superseded by a later revision.

Implementation schedules for conformance to parts of the method discussed herein are contained in the referenced Branch Technical Positions.

VI. REFERENCES

1. 10 CFR Part 50, Appendix A, General Design Criterion 4, "Environmental and Dynamic Effects Design Bases."
2. 10 CFR Part 50, Appendix A, General Design Criterion 2, "Design Bases for Protection Against Natural Phenomena."
3. Branch Technical Position SPLB 3-1, "Protection Against Postulated Piping Failures in Fluid Systems Outside Containment," attached to this SRP section.
4. Branch Technical Position EMEB 3-1, "Postulated Break and Leakage Locations in Fluid System Piping Outside Containment," attached to Standard Review Plan Section 3.6.2.
5. 10 CFR 52.47, "Contents of applications." U.S. Nuclear Regulatory Commission.
6. 10 CFR 52.80, "Issuance of combined licenses." U.S. Nuclear Regulatory Commission.

PAPERWORK REDUCTION ACT STATEMENT

The information collections contained in the Standard Review Plan are covered by the requirements of 10 CFR Part 50 and 10 CFR Part 52, and were approved by the Office of Management and Budget, approval number 3150-0011 and 3150-0151.

PUBLIC PROTECTION NOTIFICATION

The NRC may not conduct or sponsor, and a person is not required to respond to, a request for information or an information collection requirement unless the requesting document displays a currently valid OMB control number.

BRANCH TECHNICAL POSITION SPLB 3-1

PROTECTION AGAINST POSTULATED PIPING FAILURES IN FLUID SYSTEMS OUTSIDE CONTAINMENT

A. BACKGROUND

General Design Criterion (GDC) 4, "Environmental and Dynamic Effects Design Bases," of Appendix A to 10 CFR Part 50, "General Design Criteria for Nuclear Power Plants," requires that structures, systems, and components important to safety "be designed to accommodate the effects of and to be compatible with the environmental conditions associated with normal operation, maintenance, testing, and postulated accidents, including loss-of-coolant accidents." Guidance on acceptable design approaches to meet GDC 4 for existing plants and for plants for which applications for construction permits (CP) were then under review was provided in letters to applicants and licensees from A. Giambusso, Deputy Director of Licensing for Reactor Projects, most of which were dated in December 1972. The guidance document from these letters is attached as Appendix B to this position. Similar interim guidance for new plants was provided in a letter to applicants, prospective applicants, reactor vendors, and architect-engineers from J. F. O'Leary, Director of Licensing, dated July 12, 1973. This document is attached as Appendix C to this Branch Technical Position (BTP).

Reviews of nuclear power plant designs have indicated that the functional or structural integrity of systems and components required for safe shutdown of the reactor and maintenance of cold shutdown conditions could be endangered by fluid system piping failures at locations outside containment. The staff has evolved an acceptable approach for the design, including the arrangement, of fluid systems located outside of containment to ensure that the plant can be safely shut down in the event of piping failures outside containment. This approach is set forth in this position and in the companion Appendix A of SRP Section 3.6.2.

General Design Criterion (GDC) 2, "Design Bases for Protections Against Natural Phenomena," requires that SSCs important to safety be designed to withstand the effects of natural phenomena such as earthquakes. The Branch Technical Position Appendix A of SRP Section 3.6.2 does not consider full-circumferential breaks in moderate-energy piping, only through-the-wall cracks. Full circumferential breaks in non-seismic piping should be considered in addition to all breaks postulated in Appendix A of SRP section 3.6.2.

It is the intent of this design approach that postulated piping failures in fluid systems should not cause a loss of function of essential safety-related systems and that nuclear plants should be able to withstand postulated failures of any fluid system piping outside containment, taking into account the direct results of such failure and the further failure of any single active component, with acceptable offsite consequences.

The detailed provisions of the position below and of Appendix A of SRP Section 3.6.2 are intended to implement this intent with due consideration of the special nature of certain dual purpose systems and the need to define and to limit to a finite number the types and locations of piping failures to be analyzed. Although various measures for the protection of safety-related systems and components are outlined in this position, the preferred method of protection is based upon separation and isolation by plant arrangement.

Past applications for CP & Operating Licenses (OL) contained plant layouts where safety-related equipment or structures were located near the main steam and feedwater high energy lines on the basis of utilization of the "break exclusion" design basis in these lines. In

consideration of the large magnitude of potential energy stored in these (main steam and feed) systems during normal plant operation, BTP SPLB 3-1 is intended to give clear guidance on acceptable methods for protecting essential equipment from the effects of postulated failures in these systems.

B. BRANCH TECHNICAL POSITION

1. Plant Arrangement

Protection of essential systems and components¹ against postulated piping failures in high or moderate energy fluid systems that operate during normal plant conditions and that are located outside of containment, should be provided by items a, b, or c below in order of their preference.

- a. Plant arrangements should separate fluid system piping from essential systems and components. Separation should be achieved by plant physical layouts that provide sufficient distances between essential systems and components and fluid system piping such that the environmental effects of any postulated piping failure therein cannot impair the integrity or operability of essential systems and components. The following considerations should also be made:
 - (1) Even though portions of the main steam and feedwater lines meet the break exclusion requirements of item 2.A(ii) of Appendix A of SRP Section 3.6.2, they should be separated from essential equipment. Designers are cautioned to avoid concentrating essential equipment in the break exclusion zone. Essential equipment must be protected from the environmental effects of an assumed nonmechanistic longitudinal break of the main steam and feedwater lines. Each assumed nonmechanistic longitudinal break should have a cross sectional area of at least one square foot and should be postulated to occur at a location that has the greatest effect on essential equipment.
 - (2) The main steam and feedwater lines should not be routed around or in the vicinity of the control room.
- b. Fluid system piping or portions thereof not satisfying the provisions of item B.1.a should be enclosed within structures or compartments designed to protect nearby essential systems and components. Alternatively, essential systems and components may be enclosed within structures or compartments designed to withstand the effects of postulated piping failures in nearby fluid systems.
- c. Plant arrangements or system features that do not satisfy the provisions of either item B.1.a or item B.1.b should be limited to those for which the above provisions are impractical because of the stage of design or construction of the plant; because the plant design is based upon that of an earlier plant accepted by the staff as a base plant under the Commission's standardization and replication policy; or for other substantive reasons such as particular design features of the fluid systems. Such cases may arise, for example, (1) at interconnections between fluid systems and essential systems and components, or (2) in fluid

¹Underlined terms are defined in Appendix A

systems having dual functions (i.e., required to operate during normal plant conditions as well as to shut down the reactor). In these cases, redundant design features that are separated or otherwise protected from postulated piping failures, or additional protection, should be provided so that the effects of postulated piping failures are shown by the analyses and guidelines of Section B.3 to be acceptable. Additional protection may be provided by designing or testing essential systems and components to withstand the environmental effects associated with postulated piping failures.

2. Design Features

- a. Essential systems and components should be designed to meet the seismic design requirements of Regulatory Guide (RG) 1.29.
- b. Protective structures or compartments, and other protective measures should be designed in accordance with the following:

Protective structures or compartments needed to implement Section B.1 should be designed to seismic Category I requirements. The protective structures should be designed to withstand the effects of a postulated piping failure (i.e., pipe whip, jet impingement, pressurization of compartments, water spray, and flooding, as appropriate) in combination with loadings associated with the design basis earthquake within the respective design load limits for structures.

- c. Fluid system piping in containment penetration areas should be designed to meet the break exclusion provisions contained in item 2.A(ii) of Appendix A of SRP Section 3.6.2.
- d. Piping classification as recommended by RG 1.26 should be maintained without change until beyond the outboard restraint. If the restraint is located at the isolation valve, a classification change at the valve interface is acceptable.

3. Analyses and Effects of Postulated Piping Failures

- a. To show that the plant arrangement and design features provide the necessary protection of essential systems and components, piping failures should be postulated in accordance with Appendix A of SRP Section 3.6.2 (attached to SRP Section 3.6.2) and postulated to include full-circumferential ruptures of non-seismic moderate energy piping (since Appendix A of SRP Section 3.6.2 only applies during normal conditions, not seismic events). Each longitudinal or circumferential break or leakage crack should be considered separately as a single postulated initial event occurring during normal plant conditions. An analysis should be made of the effects of each such event, taking into account the provisions Appendix A of SRP Section 3.6.2 and of the system and component operability considerations of item B.3.b. below. The effects of each postulated piping failure should be shown to result in offsite consequences within the guidelines of 10 CFR Part 100 and to meet the provisions of items B.3.c. and d. below.
- b. In analyzing the effects of postulated piping failures, the following assumptions should be made with regard to the operability of systems and components:

- (1) Offsite power should be assumed to be unavailable if a trip of the turbine-generator system or reactor protection system is a direct consequence of the postulated piping failure. Also, offsite power should be assumed unavailable following seismic events.
 - (2) A single active component failure should be assumed in systems used to mitigate consequences of the postulated piping failure and to shut down the reactor, except as noted in item B.3.b.(3) below. The single active component failure is assumed to occur in addition to the postulated piping failure and any direct consequences of the piping failure, such as unit trip and loss of offsite power.
 - (3) Where the postulated piping failure is assumed to occur in one of two or more redundant trains of a dual-purpose moderate-energy essential system (e.g., one required to operate during normal plant conditions as well as to shut down the reactor and mitigate the consequences of the postulated piping failure), single active failures of components in the other train or trains of that system or other systems necessary to mitigate the consequences of the piping failure and shut down the reactor, need not be assumed provided the systems are designed to seismic Category I standards, are powered from both offsite and onsite sources, and are constructed, operated, and inspected to quality assurance, testing, and inservice inspection standards appropriate for nuclear safety systems. Examples of systems that may, in some plant designs, qualify as dual-purpose essential systems are service water systems, component cooling systems, and residual heat removal systems.
 - (4) All available systems, including those actuated by operator actions, may be employed to mitigate the consequences of a postulated piping failure. In judging the availability of systems, account should be taken of the postulated failure and its direct consequences such as unit trip and loss of offsite power, and of the assumed single active component failure and its direct consequences. The feasibility of carrying out operator actions should be judged on the basis of ample time and adequate access to equipment being available for the proposed actions. For breaks in non-seismic piping systems, only seismically-qualified systems should be assumed to be available to mitigate the consequences of the failure since a seismic event may have caused the pipe break.
- c. The environmental effects of a postulated piping failure should not preclude habitability of the control room or access to surrounding areas important to the safe control of reactor operations needed to cope with the consequences of the piping failure.
 - d. The functional capability of essential systems and components should be maintained after a failure of piping not designed to seismic Category I standards, assuming a concurrent single active failure.
 - e. The considerations related to the leak-before-break approach should conform with the provisions of SRP Section 3.6.3.

4. Implementation

- a. Designs of plants for which CP applications are tendered after July 1, 1975 should conform to the provisions of this position.
- b. Designs of plants for which CP applications are tendered after July 1, 1973 and before July 1, 1975 should conform to the provisions of either (a) the letter of July 12, 1973 from J. F. O'Leary, Appendix C to this position, or (b) this position, at the option of the applicants.
- c. Designs of plants for which CP applications were tendered before July 1, 1973 and operating licenses are issued after July 1, 1975 should follow the guidance provided in the December 1972 letter from A. Giambusso, Appendix B to this position and provide analyses of moderate energy lines made in conformance with Section B.3 of this position, as part of the operating license application for these plants to demonstrate that acceptable protection against the effects of piping failures outside containment has been provided. Alternately, this position may be used in its entirety as an acceptable basis for this finding.

For plants in this category for which CP are not issued as of February 1, 1975, a commitment by the applicant to either (a) follow the guidance of Appendix B and submit Section B.3 analyses of moderate energy lines with the plant final safety analysis report (FSAR), or (b) conform the plant design to the provisions of this position, should provide an acceptable basis for issuance of the construction permit with regard to effects of piping failures outside containment.

- d. Designs of plants for which OL are issued before July 1, 1975 are considered acceptable with regard to effects of piping failures outside containment on the basis of the analyses made and measures taken by applicants and licensees in response to the December 1972 letter from A. Giambusso, and the staff review and acceptance of these analyses and measures.

For plants in this category for which the staff review and acceptance of protection against the effects of piping failures outside containment is not substantially complete as of February 1, 1975, a commitment by the applicant to carry out analyses according to Section B.3 of this position, to submit them for staff review, and to carry out any system modifications found necessary before extended operation of the plant at power levels above one-half the license power level, should provide an acceptable basis for issuance of the operating license.

C. REFERENCES

1. 10 CFR Part 50, Appendix A, General Design Criterion 4, "Environmental and Dynamic Effects Design Bases."
2. 10 CFR Part 50, Appendix A, General Design Criterion 2, "Design Bases for Protection Against Natural Phenomena."
3. Regulatory Guide 1.29, "Seismic Design Classification."
4. Letter from A. Giambusso, Deputy Director for Reactor Projects, Directorate of Licensing, to applicants and licensees, December 1972, and attachment entitled

"General Information Required for Consideration of the Effects of a Piping System Break Outside Containment." The corrected attachment is Appendix B to this position.

5. Letter from J. F. O'Leary, Director of Licensing, to applicants, reactor vendors, and architect-engineers, July 12, 1972, and attachment entitled "Criteria for Determination of Postulated Break and Leakage Locations in High and Moderate Energy Fluid Piping Systems Outside of Containment Structures." The letter and attachment is Appendix C to this position.

APPENDIX A

BRANCH TECHNICAL POSITION SPLB 3-1 DEFINITIONS

Essential Systems and Components. Systems and components required to shut down the reactor and mitigate the consequences of a postulated piping failure, without offsite power.

Fluid Systems. High and moderate energy fluid systems that are subject to the postulation of piping failures outside containment against which protection of essential systems and components is needed.

High Energy Fluid Systems. Fluid systems that, during normal plant conditions are either in operation or maintained pressurized under conditions where either or both of the following are met:

- a. Maximum operating temperature exceeds 95 °C (200 °F), or
- b. Maximum operating pressure exceeds 1900 kPa (275 psig).

Moderate Energy Fluid Systems. Fluid systems that, during normal plant conditions, are either in operation or maintained pressurized (above atmospheric pressure) under conditions where both of the following are met:

- a. Maximum operating temperature is 95 °C (200 °F) or less, and
- b. Maximum operating pressure is 1900 kPa (275 psig) or less

Normal Plant Conditions. Plant operating conditions during reactor startup, operation at power, hot standby, or reactor cooldown to cold shutdown condition.

Upset Plant Conditions. Plant operating conditions during system transients that may occur with moderate frequency during plant service life and are anticipated operational occurrences, but not during system testing.

Postulated Piping Failures. Longitudinal and circumferential breaks in high energy fluid system piping and through-wall leakage cracks in seismically-designed moderate energy fluid system piping postulated according to the provisions Appendix A of SRP Section 3.6.2, attached to SRP Section 3.6.2. Also, full circumferential breaks in non-seismic moderate energy piping should be considered (since these breaks are not considered in Appendix A of SRP Section 3.6.2 because it only applies during normal operation, not seismic events).

Single Active Component Failure. Malfunction or loss of function of a component of electrical or fluid systems. The failure of an active component of a fluid system is considered to be a loss of component function as a result of mechanical, hydraulic, pneumatic, or electrical malfunction, but not the loss of component structural integrity. The direct consequences of a single active component failure are considered to be part of the single failure.

APPENDIX B

BRANCH TECHNICAL POSITION SPLB 3-1

This appendix consists of the attachment to the letters sent by A. Giambusso, Deputy Director for Reactor Projects, Directorate of Licensing, in December 1972 to applicants and licensees on the subject of postulated piping failures outside containment. The attachment provided guidance on measures to be taken and on information to be submitted. An errata sheet for the attachment was sent in January 1973 to recipients of the original letters. The attachment as given here has been corrected for the errata.

General Information Required for Consideration of the Effects of a Piping System Break Outside Containment

The following is a general list of information required for AEC review of the effects of a piping system break outside containment, including the double-ended rupture of the largest pipe in the main steam and feedwater systems, and for AEC review of any proposed design changes that may be found necessary. Since piping layouts are substantially different from plant to plant, applicants and licensees should determine on an individual plant basis the applicability of each of the following items for inclusion in their submittals.

1. The systems (or portions of systems) for which protection against pipe whip is required should be identified. Protection from pipe whip need not be provided if any of the following conditions will exist:
 - a. Both of the following piping system conditions are met:
 1. the service temperature is less than 200°F; and
 2. the design pressure is 275 psig or less; or
 - b. The piping is physically separated (or isolated) from structures, systems, or components important to safety by protective barriers, or restrained from whipping by plant design features, such as concrete encasement; or
 - c. Following a single break, the unrestrained pipe movement of either end of the ruptured pipe in any possible direction about a plastic hinge formed at the nearest pipe whip restraint cannot impact any structure, system, or component important to safety; or
 - d. The internal energy level¹ associated with the whipping pipe can be demonstrated to be insufficient to impair the safety function of any structure, system or component to an unacceptable level.

¹Footnotes are collected at the end of this appendix.

2. Design basis break locations should be selected in accordance with the following pipe whip protection criteria: however, where pipes carrying high energy fluids are routed in the vicinity of structures and systems necessary for safe shutdown of the nuclear plant, supplemental protection of those structures and systems shall be provided to cope with the environmental effects (including the effects of jet impingement) of a single postulated open crack at the most adverse location(s) with regard to those essential structures and systems, the length of the crack being chosen not to exceed the critical crack size. The critical crack size is taken to be 1/2 the pipe diameter in length and 1/2 the wall thickness in width.

The criteria used to determine the design basis piping break locations in the piping systems should be equivalent to the following:

- a. ASME Section III Code Class I piping² breaks should be postulated to occur at the following locations in each piping run³ or branch run:
 1. The terminal ends;
 2. Any intermediate locations between terminal ends where the primary plus secondary stress intensities S (circumferential or longitudinal) derived on an elastically calculated basis under the loadings associated with one-half safe shutdown earthquake and operational plant conditions⁴ exceeds $2.0 S_m$ ⁵ for ferritic steel, and $2.4 S_m$ for austenitic steel;
 3. Any intermediate locations between terminal ends where the cumulative usage factor (U)⁶ derived from the piping fatigue analysis and based on all normal, upset, and testing plant conditions exceeds 0.1; and
 4. At intermediate locations in addition to those determined by (1) and (2) above, selected on a reasonable basis as necessary to provide protection. As a minimum, there should be two intermediate locations for each piping run or branch run.
 - b. ASME Section III Code Class 2 and 3 piping breaks should be postulated to occur at the following locations in each piping run or branch run:
 1. The terminal ends;
 2. Any intermediate locations between terminal ends where either the circumferential or longitudinal stresses derived on an elastically calculated basis under the loadings associated with seismic events and operational plant conditions exceed $0.8 (S_h + S_A)$ ⁷ or the expansion stresses exceed $0.8 S_A$; and
 3. Intermediate locations in addition to these determined by (2) above, selected on a reasonable basis as necessary to provide protection. As a minimum, there should be two intermediate locations for each piping run or branch run.
3. The criteria used to determine the pipe break orientation at the break locations as specified under (2) above should be equivalent to the following:

- a. Longitudinal⁸ breaks in piping runs and branch runs, 4 inches nominal pipe size and larger, and/or
 - b. Circumferential⁹ breaks in piping runs and branch runs exceeding 1 inch nominal pipe size.
4. A summary should be provided of the dynamic analyses applicable to the design of Category I piping and associated supports which determine the resulting loadings as a result of a postulated pipe break including:
- a. The locations and number of design basis breaks on which the dynamic analyses are based.
 - b. The postulated rupture orientation, such as a circumferential and/or longitudinal break(s), for each postulated design basis break location.
 - c. A description of the forcing functions used for the pipe whip dynamic analyses, including the direction, rise time, magnitude, duration, and initial conditions that adequately represent the jet stream dynamics and the system pressure difference.
 - d. Diagrams of mathematical models used for the dynamic analysis.
 - e. A summary of the analyses which demonstrates that unrestrained motion of ruptured lines will not damage to an unacceptable degree, structures, systems, or components important to safety, such as the control room.
5. A description should be provided of the measures, as applicable, to protect against pipe whip, blowdown jet and reactive forces, including:
- a. Pipe restraint design to prevent whip impact;
 - b. Protective provisions for structures, systems, and components required for safety against pipe whip and blowdown jet and reactive forces;
 - c. Separation of redundant features;
 - d. Provisions to separate physically piping and other components of redundant features; and
 - e. A description of the typical pipe whip restraints and a summary of number and location of all restraints in each system.
6. The procedures that will be used to evaluate the structural adequacy of Category I structures and to design new seismic Category I structures should be provided including:
- a. The method of evaluating stresses, e.g., the working stress method and/or the ultimate strength method that will be used;
 - b. The allowable design stresses and/or strains; and

- c. The load factors and the load combinations.
7. The structural design loads, including the pressure and temperature transients, the dead, live and equipment loads and the pipe and equipment static, thermal, and dynamic reactions should be provided.
 8. Seismic Category I structural elements such as floors, interior walls, exterior walls, building penetrations and the buildings as a whole should be analyzed for eventual reversal of loads due to the postulated accident.
 9. If new openings are to be provided in existing structures, the capabilities of the modified structures to carry the design loads should be demonstrated.
 10. Verification that failure of any structure, including non-seismic Category I structures, caused by the accident, will not cause failure of any other structure in a manner to adversely affect:
 - a. Mitigation of the consequences of the accidents; and
 - b. Capability to bring the unit(s) to a cold shutdown condition.
 11. Verification that rupture of a pipe carrying high energy fluid will not directly or indirectly result in:
 - a. Loss of required redundancy in any portion of the protection system (as defined in IEEE-279), Class IE electric system (as defined in IEEE-308), engineered safety feature equipment, cable penetrations, or their interconnecting cables required to mitigate the consequences of that accident and place the reactor(s) in a cold shutdown condition; or
 - b. Environmentally induced failures caused by a leak or rupture of the pipe which would not of itself result in protective action but does disable protection functions. In this regard, a loss of redundancy is permitted; but a loss of function is not permitted. For such situations, plant shutdown is required.
 12. Assurance should be provided that the control room will be habitable and its equipment functional after a steam line or feedwater line break or that the capability for shutdown and cooldown on the unit(s) will be available in another habitable area.
 13. Environmental qualification should be demonstrated by test for that electrical equipment required to function in the steam-air environment resulting from a high energy line break. The information required for our review should include the following:
 - a. Identification of all electrical equipment necessary to meet requirements of (11) above. The time after the accident in which they are required to operate should be given.
 - b. The test conditions and the results of test data showing that the systems will perform their intended function in the environment resulting from the postulated accident and time interval of the accident. Environmental conditions used for the tests should be selected from a conservative evaluation of accident conditions.

- c. The results of a study of steam systems identifying locations where barriers will be required to prevent steam jet impingement from disabling a protection system. The design criteria for the barriers should be stated and the capability of the equipment to survive within the protected environment should be described.
 - d. An evaluation of the capability for safety-related electrical equipment in the control room to function in the environment that may exist following a pipe break accident should be provided. Environmental conditions used for the evaluation should be selected from conservative calculations of accident conditions.
 - e. An evaluation to assure that the onsite power distribution system and onsite sources (diesels and batteries) will remain operable throughout the event.
14. Design diagrams and drawings of the steam and feedwater lines including branch lines showing the routing from containment to the turbine building should be provided. The drawings should show elevations and include the location relative to the piping runs of safety-related equipment including ventilation equipment, intakes, and ducts.
 15. A discussion should be provided of the potential for flooding of safety-related equipment in the event of failure of a feedwater line or any other line carrying high energy fluid.
 16. A description should be provided of the quality control and inspection programs that will be required or have been utilized for piping systems outside containment.
 17. If leak detection equipment is to be used in the proposed modifications, a discussion of its capabilities should be provided.
 18. A summary should be provided of the emergency procedures that would be followed after a pipe break accident, including the automatic and manual operations required to place the reactor unit(s) in a cold shutdown condition. The estimated times following the accident for all equipment and personnel operational actions should be included in the procedure summary.
 19. A description should be provided of the seismic and quality classification of the high energy fluid piping systems including the steam and feedwater piping that run near structures, systems, or components important to safety.
 20. A description should be provided of the assumptions, methods, and results of analyses, including steam generator blowdown, used to calculate the pressure and temperature transients in compartments, pipe tunnels, intermediate buildings, and the turbine building following a pipe rupture in these areas. The equipment assumed to function in the analyses should be identified and the capability of systems required to function to meet a single active component failure should be described.
 21. A description should be provided of the methods or analyses performed to demonstrate that there will be no adverse effects on the primary and/or secondary containment structures due to a pipe rupture outside these structures.

¹ The internal fluid energy level associated with the pipe break reaction may take into account any line restrictions (e.g., flow limiter) between the pressure source and break location, and

the effects of either single-ended or double-ended flow conditions, as applicable. The energy level in a whipping pipe may be considered as insufficient to rupture an impacted pipe of equal or greater nominal pipe size and equal or heavier wall thickness.

- ² Piping is a pressure retaining component consisting of straight or curved pipe and pipe fittings (e.g., elbows, tees, and reducers).
- ³ A piping run interconnects components such as pressure vessels, pumps, and rigidly fixed valves that may act to restrain pipe movement beyond that required for design thermal displacement. A branch run differs from a piping run only in that it originates at a piping intersection, as a branch of the main pipe run.
- ⁴ Operational plant conditions include normal reactor operation, upset conditions (e.g., anticipated operational occurrences) and testing conditions.
- ⁵ S_m is the design stress intensity as specified in Section III of the ASME Boiler and Pressure Vessel Code, "Nuclear Plant Components."
- ⁶ S_A is the cumulative usage factor as specified in Section III of the ASME Boiler and Pressure Vessel Code, Nuclear Power Plant Components."
- ⁷ S_n is the stress calculated by the rules of NC-3600 and ND-3600 for Class 2 and 3 components, respectively, of the ASME Code Section III Winter 1972 Addenda. S_A is the allowable stress range for expansion stress calculated by the rules of NC-3600 of the ASME Code, Section III, or the USA Standard Code for Pressure Piping, ANSI B31.1.0-1967.
- ⁸ Longitudinal breaks are parallel to the pipe axis and oriented at any point around the pipe circumference. The break area is equal to the effective cross-sectional flow area upstream of the break location. Dynamic forces resulting from such breaks are assumed to cause lateral pipe movements in the direction normal to the pipe axis.
- ⁹ Circumferential breaks are perpendicular to the pipe axis, and the break area is equivalent to the internal cross-sectional area of the ruptured pipe. Dynamic forces resulting from such breaks are assumed to separate the piping axially, and cause whipping in any direction normal to the pipe axis.

APPENDIX C

BRANCH TECHNICAL POSITION SPLB 3-1

This appendix consists of the letter and attachment sent by J. F. O'Leary, Director of Licensing, to applicants, reactor vendors, and architect-engineers on the subject of postulated piping failures outside containment. The letter was dated July 12, 1973.

Late last year, the Atomic Energy Commission's Regulatory staff requested those utilities that operate nuclear power plants, have applied for operating licenses, or have plants whose construction permit review was essentially complete, to assess the effects and consequences of a postulated rupture of piping containing high-energy fluids and located outside of the containment structure. These requests were issued by Mr. A. Giambusso, Deputy Director for Reactor Projects, Directorate of Licensing, in letters, most of which were dated in December 1972.

Because these plants were either in operation or in advanced stages of engineering design and construction, the request included guidance for corrective modifications that could be implemented by in-situ measures. Such modifications included relocation or rerouting of piping, installation of impingement barriers and encapsulation sleeves around high-stressed piping regions, provisions for venting of compartments subject to pressurization, addition of piping restraints, and strengthening of structural components of buildings.

From our review of responses submitted to the Regulatory staff, and from discussions with architect-engineering firms, we have learned that some of these organizations have inferred that the criteria contained in Mr. A. Giambusso's letter pertaining to corrective modifications for plants in advanced stages of construction and operation are applicable for the design of high-energy fluid systems outside the containment in new designs of nuclear power plants. It was not our intent that the criteria for corrective plant modifications be applied to new power plants that are in the initial design stages. We believe that a more direct approach, involving a rearrangement of the physical plant layout with a view to relocation of essential safety systems and components is appropriate for the new plants.

For the present, pending issuance of a planned AEC Regulatory Guide "Protection Against Postulated Events and Accidents Outside Containment," an acceptable implementation of Criterion 4 of the Commission's General Design Criteria listed in Appendix A of 10 CFR Part 50, as applied to new plants with respect to the design of structures, systems and components important to safety and located outside of containment is as follows:

- I. PIPING SYSTEMS CONTAINING HIGH-ENERGY FLUIDS* DURING NORMAL REACTOR OPERATION
 - a. The piping systems are isolated by adequate physical separation and remotely located from safety systems and components that are required to shut down the reactor safely and maintain the plant in a cold shutdown condition.
 - b. Where isolation by remote location is impracticable, systems containing high-energy fluids, or portions of the systems, are enclosed within the structures suitably designed to protect adjoining safety systems and components required

*Refer to Appendix A for identification of high-energy fluid systems.

to shut down the reactor safely and maintain the plant in a cold shutdown condition from postulated pipe failures within the enclosure.

- c. Where both isolation by remote location (as specified in I.a) and enclosure in protective structures (as specified in I.b) are impracticable, systems containing high-energy fluids, or portions of the systems, are provided with restraints and protective measures such that the operability and integrity of structures, safety systems and components that are required to shut down condition are not impaired.
- d. Protective enclosures for the piping systems containing high-energy fluids are designed as Seismic Category I structures to withstand the combined effects of a postulated pipe break, the dynamic effects of pipe whipping, the jet impingement forces, and the compartment pressurization as a consequence of discharging fluids in combination with the specified seismic event of the Safe Shutdown Earthquake and normal operating loads.
- e. Piping systems containing high-energy fluids are designed so that the effects of a single postulated pipe break cannot, in turn, cause failures of other pipes or components with unacceptable consequences.

In addition, any systems, or portions of systems, that are designed to mitigate the consequences of a postulated pipe failure, and to place the reactor in the cold shutdown condition, are provided with design features that will assure the performance of their safety function, assuming a single active component failure.

- f. For a postulated pipe failure, the escape of steam, water, and heat from structures enclosing the high-energy fluid containing piping does not preclude: 1) the accessibility to surrounding areas important to the safe control of reactor operations, 2) the habitability of the control room, 3) the ability of instrumentation, electric power supplies, and components and controls to initiate, actuate and complete a safety action. In this regard, a loss of redundancy is permissible but not the loss of function.
 - g. The criteria for determination of postulated break locations are contained in the attached Appendix A, "Criteria for Determination of Postulated Pipe Break or Leakage Locations in Fluid Piping Systems Outside Containments."
- II. PIPING SYSTEMS CONTAINING MODERATE-ENERGY FLUIDS** DURING REACTOR OPERATION
- a. Piping systems containing moderate-energy fluids are designed to comply with the criteria applied to high-energy fluid piping systems as listed under I., above, except that the piping is postulated to develop a limited-size through-wall leakage crack instead of a pipe break.

** Refer to Appendix A for identification of moderate-energy fluid systems.

- (b) For each postulated leakage, design measures are included that provide protection from the effects of the resulting water spray and flooding to the same extent required to satisfy criterion I(e).
- (c) The criteria for determination of postulated leakage locations are contained in Appendix A.

The measures taken for the protection of structures, systems and components important to safety should not preclude the conduct of inservice examinations of ASME Class 2 and 3 pressure-retaining components as required by the rules of ASME Boiler and Pressure Vessel Code - Section XI, "Inservice Inspection of Nuclear Power Plant Components."

Although compliance with the design criteria listed above should be accomplished by plant arrangement and layouts utilizing the separation concept to the extent practicable, special consideration will be necessary to provide adequate protection where interconnection is unavoidable between high-energy fluid containing piping and piping of systems important to safety.

We are prepared to discuss with you these guidelines for the design of new nuclear power plants with regard to protection required against postulated breaks of high and moderate energy piping outside of containment, particularly for those plants with construction permit applications currently under consideration.

Sincerely,

John F. O'Leary, Director
Directorate of Licensing

Enclosure:
Appendix A

APPENDIX A TO J. F. O'LEARY LETTER OF JULY 12, 1972

CRITERIA FOR DETERMINATION OF POSTULATED BREAK AND LEAKAGE LOCATIONS
IN HIGH¹ AND MODERATE² ENERGY FLUID PIPING SYSTEMS
OUTSIDE OF CONTAINMENT STRUCTURES^c

A. High-Energy Fluid Systems

1. For piping systems that by plant arrangement and layout are isolated by remote location for structures, systems, and components important to safety³, pipe breaks⁴ need not be postulated provided the requirements of A.4 are satisfied.
2. For piping systems that are enclosed in suitably designed concrete structures or compartments to protect structures, systems, and components important to safety, pipe break should be postulated at the following locations in each piping or branch run within the protective structure:
 - a. the terminal ends⁹ of the piping or branch run (except as exempted by the provisions of A.4), if located within the protective structure or compartment, and
 - b. each fitting (i.e., elbow, tee, cross, non-standard fitting), and
 - c. a minimum of one break selected in each piping or branch run within the protective structure or compartment at a location that results in the maximum loading from the impact of the postulated ruptured pipe and jet discharge force on wall, floor, and roof of the structure or compartment, including internal pressurization, and taking into account any piping restraints provided to limit pipe motions.
3. For portions of piping systems that can neither be isolated as specified in A.1, nor enclosed in protective structures as specified in A.2, pipe breaks should be postulated at the following locations in each piping or branch run within the confines of the structures or compartments that enclose or adjoin areas containing systems and components important to safety:
 - a. the terminal ends⁹ of piping or branch run (except as exempted by A.4), if located within the boundary of the confining structure or each compartment within the structure; and
 - b. any intermediate location within the boundary of the confining structure or each compartment within the structure where the stresses⁵ under the loadings associated with specified seismic events⁶ and operational plant conditions⁷ exceed $0.8 (S_h + S_A)^8$ or, in lieu of these calculated stress-related locations, at each fitting (i.e., elbow, tree, cross, non-standard fitting); and
 - c. a minimum of two separated locations within the boundary of the confining structure of each compartment within the structure in piping or branch runs exceeding twenty pipe diameters in length; a minimum of one location in piping or branch runs twenty pipe-diameters or less in length except that no intermediate locations need to be postulated in

branch runs that are three pipe-diameters or less in length. Intermediate break locations should be selected such that the maximum pipe whip and jet impingement will result, assuming for this purpose an unrestrained ruptured pipe.

4. For those portions of the piping passing through primary containment penetrations and extending to the first outside isolation valve, pipe breaks need not be postulated provided such piping is conservatively reinforced and restrained beyond the valve such that, in the event of a postulated pipe break outside containment, the transmitted pipe loads will neither impair the operability of the valve nor the integrity of the piping or the containment penetration. (A terminal end of such piping is considered to originate at this restraint location.)

B. Moderate-Energy Fluid Systems

1. For piping systems that by plant arrangement and layout are isolated and physically separated and remotely located from systems and components important to safety, through-wall leakage cracks need not be postulated.
2. For piping systems that are located in the same areas as high-energy fluid systems which, by the criteria of A.1 to A.3 have postulated pipe break locations, through-wall leakage cracks need not be postulated.
3. For piping systems that are located in areas containing systems and components important to safety, but where no high-energy fluid systems are present, through-wall leakage cracks should be postulated at the most adverse location to determine the protection needed to withstand the effects of the resulting water spray and flooding.

C. Size and Types of Pipe Breaks and Cracks

1. The following types of breaks should be postulated at the locations specified by the criteria listed under A. High-Energy Fluid Systems:
 - a. longitudinal breaks in piping runs and branch runs with nominal pipe sizes of 4 inches and larger,
 - b. circumferential breaks in piping runs and branch runs exceeding a nominal pipe size of 1 inch.
2. The following leakage cracks are postulated at the locations specified by the criteria listed under B. Moderate-Energy Fluid Systems:
 - a. through-wall leakage cracks in piping and branch runs exceeding a nominal pipe size of 1 inch, where the crack opening is assumed as 1/2 the pipe diameter in length and 1/2 the pipe wall thickness in width.

FOOTNOTES

- ¹ High-energy systems include those systems where either of the following conditions are met:
 - (a) the maximum operating temperature exceeds 200°F, and
 - (b) the maximum operating pressure exceeds 275 psig.
- ² Moderate energy systems include those systems where both of the following conditions are met:
 - (a) the maximum operating temperature is 200°F or less, and
 - (b) the maximum operating pressure is 275 psig or less.
- ³ Structures, systems, and components important to safety, as specified herein refer to those plant features required to shut down the reactor safely and maintain the plant in the cold shutdown condition.
- ⁴ Break in piping means (a) a complete circumferential pipe severance and, (b) a longitudinal split opening an area equal to the pipe area, but without pipe severance. Such breaks are assumed to occur at each specified break location, but not concurrently.
- ⁵ Either circumferential or longitudinal stresses derived on an elastically-calculated basis.
- ⁶ Specified seismic events are earthquakes that produce at least 50 percent of the vibratory motion of the Safe Shutdown Earthquake (SSE).
- ⁷ Operational plant conditions include normal reactor operation, upset conditions, (e.g., anticipated operational occurrences) and testing conditions.
- ⁸ S_h is the allowable stress at maximum temperature, and S_A is the allowable stress range for expansion stresses for Class 2 and 3 piping as permitted by the rules of ASME Code Section III.
- ⁹ Terminal ends of pipe runs originate at points of maximum constraint (e.g., connections to vessels, pumps, valves, fittings that are rigidly anchored to structures). Terminal ends of branch runs originate at pipe intersections and components that act as rigid constraints.
- ¹⁰ These criteria are intended for the purpose of designing piping restraints and do not preclude consideration of other aspects of the AEC General Design Criteria, such as single failure criteria and other additional protective measures required to provide protection against environmental conditions incident to postulated accidents.

SRP Section 3.6.1 Description of Changes

This SRP section affirms the technical accuracy and adequacy of the guidance previously provided in (Draft) Revision 3, dated April 1996 of this SRP. See ADAMS accession number ML052070312.

In addition this SRP section was administratively updated in accordance with NRR Office Instruction, LIC-200, Revision 1, "Standard Review Plan (SRP) Process." The revision also adds standard paragraphs to extend application of the updated SRP section to prospective submittals by applicants pursuant to 10 CFR Part 52.

The technical changes are incorporated in Revision 2, dated [Month] 2007:

Review Responsibilities - Reflects changes in review branches resulting from reorganization and branch consolidation. Change is reflected throughout the SRP.

The following summarizes the changes in this proposed Revision 3 of SRP Section 3.6.1. The draft Revision 3 of SRP Section 3.6.1, dated April 1996, was considered a source of potential changes, and some of those changes were incorporated into this proposed revision. However, all identified changes are made in reference to the last official revision (Revision 2, October 1990).

1. General changes included editorial and formatting changes.
2. Standard language was added throughout the SRP section to extend the applicability to licensing and design certification reviews submitted under 10 CFR Part 52, including the applicability of the Combined License Applications for Nuclear Power Plants (LWR Edition) - Regulatory Guide DG-1145 as superceded by the final guide expected December 2006.
3. Language was added to the boilerplate on the front page, acceptance criteria and review procedures to clarify that the SRP represents an acceptable approach for meeting the Commission's regulations and that applicants are required to identify deviations from this criteria and evaluate how the alternative approaches meet the Commission's regulations.
4. The 1996 draft of this section proposed to modify Appendix B (Letter from A. Giambusso, Deputy Director for Reactor Projects, Directorate of Licensing, in December 1972) and Appendix C (Letter from J. F. O'Leary, Director of Licensing, dated July 12, 1973). These are historical documents, and should be kept in their original form. These letters were returned to their original wording.
5. The 1996 draft also proposed to eliminate most of the Implementation subsection of the Branch Technical Position. Since this subsection describes which guidance applies to which plants by date, it should not be removed as it is important for reviews of existing plants. The Implementation subsection was retained in its Revision 2 (1990) wording.
6. Specific changes are identified by section of the SRP as follows:

I. AREAS OF REVIEW

Language was added throughout this SRP Section to clarify that this review deals with environmental effects of pipe failures. SRP Section 3.4.1 addresses the related internal flood protection, and SRP Section 3.6.1 addresses the related dynamic effects of piping failures.

A standard paragraph and references for ITAAC were added to the Areas of Review.

A reference to General Design Criterion 2 was added to reflect the corresponding change in the acceptance criteria section. See "Acceptance Criteria" below for explanation.

The Review Interfaces subsection was reorganized and updated to provide a consistent format between all SRP Sections. Also, branch acronyms were removed as part of the standard format revision.

II. ACCEPTANCE CRITERIA

General Design Criterion 2 was added to the Acceptance Criteria of this SRP Section to reflect the regulatory basis for considering full-circumferential breaks of non-seismic moderate-energy piping. The Branch Technical Position Appendix A of SRP Section 3.6.2 does not consider full-circumferential breaks in moderate-energy piping, only through-the-wall cracks. Full-circumferential breaks in non-seismic piping should be considered in addition to all breaks postulated in Appendix A of SRP Section 3.6.2. This addition of GDC 2 to the Acceptance Criteria does not reflect a new staff position, it only provides clarification on a commonly misinterpreted position.

Acceptance criteria were added for ITAAC as part of the common SRP format update.

A Technical Rationale subsection was added to explain the basis for including each General Design Criterion.

III. REVIEW PROCEDURES

The review procedures were modified to ensure inclusion of effects from full-circumferential breaks in non-seismic moderate-energy piping systems, as described in the "Acceptance Criteria" section above.

A standard paragraph was added to address COL applications under 10 CFR Part 52.

IV. EVALUATION FINDINGS

The Evaluation Findings were modified to reflect the inclusion of GDC 2, as described in the "Acceptance Criteria" section, above.

V. IMPLEMENTATION

Standard language was added to address applications under 10 CFR Part 52.

VI. REFERENCES

References were updated to include the relevant ITAAC requirements.

BRANCH TECHNICAL POSITION SPLB 3-1

A. Background

Language was modified to clarify that this review covers the environmental effects of piping failures outside of containment. Dynamic effects are covered under SRP Section 3.6.2. This change is reflected throughout the BTP SPLB 3-1.

B. Branch Technical Position

Guidance was removed from this section that contained recommendations on design for protection of dynamic effects of this section. This guidance was removed because dynamic effects are covered more completely under SRP Section 3.6.2 and its attached Appendix A of SRP Section 3.6.2.

Clarification was added to state that offsite power should not be assumed to be available after a seismic event.

Clarification was added in regards to system availability for mitigating the effects of a non-seismic pipe break. Only seismically-qualified systems should be assumed available after the failure of a non-seismic pipe break since a seismic event may have caused the failure.

Appendix A: Definitions

The definition for Postulated Piping Failures was modified to ensure that consideration was given for full-circumferential ruptures on non-seismic moderate-energy piping as considered by the inclusion of GDC 2 in the Acceptance Criteria.

Appendix B: Giambusso Letter

No changes made. This letter is provided in its original form.

Appendix C: O'Leary Letter

No changes made. This letter is provided in its original form.