

GE Energy Nuclear

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Revision **0**

LICENSING TOPICAL REPORT

Advanced Boiling Water Reactor (ABWR) Hydrogen Recombiner Requirements Elimination

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1.0 Introduction

The purpose of this Licensing Topical Report (LTR) is to obtain US Nuclear Regulatory Commission (USNRC) approval of a generic change in the design certification for the U.S. Advanced Boiling Water Reactor (ABWR) design, in accordance with planned revisions to 10 CFR 52.63. This LTR specifically requests approval for changes to Tier 1 of the Design Control Document (DCD) and the generic Technical Specifications to reflect deletion of the hydrogen recombiners and the relaxation of the safety classification of the hydrogen and oxygen monitors from safety-related to non-safety-related.

After issuance of the design certification for the ABWR, the Nuclear Regulatory Commission approved a revision to 10 CFR 50.44 "Standards for Combustible Gas Control System in Light-Water-Cooled Power Reactors," to amend its standards for combustible gas control in lightwater-cooled power reactors. The amended rule eliminates the requirements for hydrogen recombiners and relaxes the requirements for hydrogen and oxygen monitoring. This LTR updates the current ABWR certified design to incorporate the amended regulations.

Another purpose of this LTR is to address COL License Information Item 6.2 on providing a comparison of costs and benefits for alternate hydrogen control in accordance with DCD subsection 6.2.7.1.

NRC review of the technical content of this LTR is requested with the understanding that this LTR and subsequent discussions between GE and NRC staff may form the basis for sitespecific departures requested in one or more future Combined Operating License Applications.

2.0 Description **Of** Design Certification

The ABWR design employs hydrogen recombiners. The hydrogen recombiners and associated equipment comprise the Flammability Control System (FCS). The function of the hydrogen recombiners is to eliminate the potential breach of containment due to a hydrogen and oxygen buildup and subsequent explosion. Hydrogen recombiners reduce the hydrogen concentration in the containment following a design basis loss-of-coolant (LOCA) or main steam line break accident. The recombiners accomplish this by recombining hydrogen and oxygen to form water vapor. The vapor remains in the containment, thus eliminating any potential for a hydrogen explosion. The hydrogen recombiners are manually initiated since hydrogen and oxygen buildup beyond the flammability limits would not be reached until several days after a design basis accident (DBA).

Two 100% capacity independent hydrogen recombiners systems are provided as part of the certified design. Each consists of controls located in the control room, a power supply and a recombiner. Recombination is accomplished by heating the nitrogen, hydrogen, and oxygen mixture above 1150 °F. The resulting water vapor and discharge gases are cooled prior to discharge from the recombiner. A single recombiner is capable of maintaining the hydrogen concentration below the 4.1 volume percent (v/p) flammability limit as defined in Regulatory Guide 1.7 for the worst case DBA. Two recombiners are provided for redundancy and independence. Each recombiner is powered from a separate engineered safety feature (ESF) bus, and is provided with a separate power panel and control panel. Operation with at least one hydrogen recombiner ensures that the post LOCA and steamline break accident hydrogen concentrations can be prevented from exceeding the flammability limit.

The Containment Atmospheric Monitoring System (CAMS) is used for post accident monitoring of the primary containment. The system monitors radiation levels as well as the hydrogen and oxygen gas concentration levels in the drywell and in the suppression chamber, displays the measurements in the main control room (MCR), and activates alarms in the MCR upon detection of high levels of radiation and/or gas concentrations.

The CAMS consists of two independent divisions and each division is composed of two radiation channels and a local oxygen and hydrogen gas monitor.

The hydrogen and oxygen monitoring equipment of each CAMS division analyze the hydrogen and oxygen gas concentration levels in the drywell or in the suppression chamber and provide separate gas concentration displays in the MCR.

Each CAMS division is powered from its respective divisional Class 1E power source. In the CAMS, independence is provided between the Class **lE** divisions, and also between the Class **I** E divisions and non-Class **I** E equipment.

3.0 Description **Of** Proposed Departure

The proposed departure eliminates the requirements for hydrogen recombiners from the ABWR certified design and reclassifies the hydrogen and oxygen monitors from safety-related to nonsafety-related. Exemption from the generic Technical Specifications associated with the hydrogen recombiner elimination is requested. Tier 2 design departures associated with the Tier **I** departures are also identified.

4.0 Justification **Of** Proposed Departure

The proposed changes to the certified design are applicable to both the Flammability Control System and the Containment Atmospheric Monitoring System. The basis for the proposed departures are separately addressed.

The proposed change to eliminate the hydrogen recombiners is justified based on the following:

- The revised 10 CFR 50.44 does not require light water reactors which operate with inerted containments to have hydrogen recombiners. The primary containment of the ABWR certified design is inerted with nitrogen.
- The revised 10 CFR 50.44 requires that containments have a capability for ensuring a mixed atmosphere. The ABWR certified design uses the Atmospheric Control System, and containment sprays to ensure that the primary containment atmosphere is well mixed.
- The revised 10 CFR 50.44 requires that equipment be provided for monitoring hydrogen in the containment. The ABWR design provides equipment to continuously measure the concentration of hydrogen in the containment atmosphere following a significant beyond design-basis accident for combustible gas control and accident management, including emergency planning.
- The revised 10 CFR 50.44 requires that equipment be provided for monitoring oxygen in containments that use an inerted atmosphere for combustible gas control. The ABWR design provides equipment to continuously measure the concentration of oxygen in the containment atmosphere following a significant beyond design-basis accident for combustible gas control and accident management, including emergency planning.

The proposed changes to the design certification to downgrade the hydrogen monitors from safety-related to non-safety-related are justified based on the following:

- * Hydrogen recombiners, and therefore, monitors, are no longer required to mitigate design basis accidents, and, therefore, the hydrogen monitors do not meet the definition of a safety-related component as defined in 10 CFR 50.2.
- **"** As part of the rulemaking to revise 10 CFR 50.44, the Commission concluded that hydrogen monitoring is not the primary means of monitoring of beyond design basis accidents.
- Section 4 of Attachment 2 to SECY-00-0198, "Status Report on Study of Risk-Informed Changes to 10 CFR 50.44 (Combustible Gas Control for Nuclear Power Plants)" found that hydrogen monitors were not risk significant.
- The hydrogen monitoring equipment requirements no longer meet any of the four criteria in 10 CFR 50.36 (c)(2)(ii) for retention in the Technical Specifications and, therefore, may be relocated to other licensee-controlled documents.

The proposed changes to the design certification to downgrade the oxygen monitors from safety-related to non-safety-related are justified based on the following:

- Recombiners, and therefore, oxygen monitors, are no longer required to mitigate design basis accidents, and, therefore, the oxygen monitors do not meet the definition of a safety-related component as defined in 10 CFR 50.2.
- As part of the rulemaking to revise 10 CFR 50.44, the Commission found that Category 2, as defined in Regulatory Guide 1.97, is an appropriate classification for the oxygen monitors because the monitors are required to verify the status of the inert containment.
- Oxygen monitoring is not the primary means of indicating a significant abnormal degradation of the inert containment.
- **"** Oxygen monitors have not been shown in PRA to be risk significant.
- The oxygen monitoring equipment requirements no longer meet any of the four criteria in 10 CFR 50.36 (c)(2)(ii) for retention in the Technical Specifications and, therefore, may be relocated to other licensee-controlled documents.

The proposed changes revise the generic Technical Specifications in Chapter 16 of Tier 2 of the ABWR DCD to reflect changes in the applicable regulatory requirements and criteria in 10 CFR 50.44. With the elimination of the Flammability Control System, hydrogen recombiners are no longer required and the safety classification of the hydrogen and oxygen monitors is changed to non-safety-related.

COL License Information Item 6.2 states that the costs and benefits of alternate hydrogen control in accordance with DCD subsection 6.2.7.1 shall be. provided. In the statement of consideration for the 2003 revision to its requirements for combustible gas control in containment in 10CFR50.44, the Commission made the following statement:

In plants with Mark I and II containments, the containment atmosphere is required to be maintained with a low concentration of oxygen, rendering it inert to combustion. Mark I and II containments can be challenged beyond 24 hours by the long-term generation of oxygen through radiolysis. The regulatory analysis for this proposed rulemaking found the cost of maintaining the recombiners exceeded the benefit of retaining them to prevent containment failure sequences that progress to the very late time frame. The NRC believes that this conclusion would also be true for the backup hydrogen purge system even though the cost of the hydrogen purge system would be much lower because the system also is needed to inert the containment.

68 Fed. Reg. 54123, 54126 (Sept. 16, 2003). Based, in part, on this analysis, the NRC approved an amendment to 10 CFR § 52.47(a)(1)(ii) stating that in applications for design certifications the required demonstrations of compliance with the Three Mile Island requirements are not required to evaluate alternative hydrogen control systems. Although this amendment did not apply directly to the certification of the ABWR, the ABWR containment, like the Mark I and II containments, is inerted. Consequently, the NRC's conclusion regarding the cost-benefit balance for recombiners should also apply to the ABWR. Similarly, the Commission found that combustible gas generated during a severe accident is not risk-significant for inerted containments. 68 Fed. Reg. at 54125. Therefore, deletion of the recombiners will not affect the results of the evaluation of Severe Accident Mitigation Design Alternatives (SAMDAs).

The DCD Tier **I** changes and exemption from the generic Technical Specifications have been evaluated under the criteria in Section VIII.A.4 of the ABWR design certification rule. The proposed departures and exemptions meet the criteria as stated in Section VIII of the design certification rule and 10 CFR 50.12 (a)(1) that establish the basis for NRC approval. This evaluation is summarized in Appendix A.

5.0 Nuclear Safety Review

The elimination of the hydrogen recombiner (Flammability Control System) and relaxation of the classification of the hydrogen and oxygen monitors, including the removal of these requirements from generic Technical Specifications, is acceptable in light of existing plant equipment, instrumentation, procedures, and programs that provide effective mitigation of and recovery from reactor accidents.

In addition, the ABWR certified design provides for the Atmospheric Control System to provide and maintain an inert atmosphere in the primary containment during plant operation. Atmospheric mixing of hydrogen releases is achieved by natural processes. Mixing will be enhanced by operation of the containment sprays, which are used to control pressure in the primary containment. Ensuring the containment atmosphere is well mixed is a major tenet of the revised 10 CFR 50.44.

Maintenance and surveillance/inspection requirements will be reduced because of the reduced number of active components.

The revised 10 CFR 50.44 eliminates requirements for hydrogen control systems to mitigate hydrogen releases. The installation of hydrogen recombiners and/or vent or purge systems required by 10 CFR 50.44(b)(3) was intended to address the limited quantity and rate of hydrogen generation that was postulated from a design basis LOCA. The Commission has found that this hydrogen release is not risk-significant because the design basis LOCA hydrogen release does not contribute to the conditional probability of a large release up to approximately 24 hours after the onset of core damage. In addition, these systems were ineffective at mitigating hydrogen releases from risk-significant accident sequences that would threaten containment integrity.

With the elimination of the hydrogen recombiners, hydrogen and oxygen monitors are no longer required to mitigate design basis accidents and, therefore, the hydrogen monitors do not meet the definition of a safety-related component as defined in 10 CFR 50.2. The hydrogen and oxygen monitors no longer meet the definition of Category **I** in Regulatory Guide 1.97 for post accident monitoring. As part of the rulemaking to revise 10 CFR 50.44, the Commission found that Category 3, as defined in Regulatory Guide 1.97, is an appropriate categorization for the hydrogen monitors because the monitors are not required to diagnose the course beyond design basis accidents. The Commission also determined that Category 2, as defined in Regulatory Guide 1.97, is an appropriate categorization for the oxygen monitors, because the monitors are required to verify the status of the inert containment.

The hydrogen recombiner and hydrogen and oxygen monitoring equipment are not considered accident precursors, nor does their existence or elimination have any adverse impact on the preaccident state of the reactor core or post accident confinement of radionuclides within the containment building.

The regulatory requirements for the hydrogen and oxygen monitors can be relaxed without degrading the plant emergency response. The emergency response in this sense, refers to the methodologies used in ascertaining the condition of the reactor core, mitigating the consequences of an accident, assessing and projecting offsite releases of radioactivity, and establishing protective action recommendations to be communicated to offsite authorities. Classification of the hydrogen monitors as Category 3, classification of the oxygen monitors as Category 2 and removal of the hydrogen and oxygen monitors from generic Technical Specifications will not prevent an accident management strategy through the use of the Severe Accident Management Guidelines (SAMGs), the Emergency Plan (EP), the Emergency Operating Procedures (EOP), and site survey monitoring that support modification of emergency plan Protective Action Recommendations (PARs).

6.0 Consistency With ABWR Design Control Document

The changes described in this LTR are to Tier 1 and Tier 2 of the ABWR DCD Revision 4. This includes the piping and instrumentation diagram (Figure 6.2-40) changes that are marked in Appendix C.

A further detailing of changes to the DCD are described in the next section.

7.0 Descriptions **Of DCD** Markups

Appendix B contains Tier **I** markups to the DCD to account for the changes discussed in this LTR. Appendix C contains Tier 2 markups to the DCD to account for the changes discussed in this LTR. Appendix C also contains a markup of the generic Technical Specifications.

8.0 Conclusion

The proposed change to the certified design to eliminate the Flammability Control System is based on implementation of a revision to 10 CFR 50.44 regulations for combustible gas control. The primary containment of the ABWR certified design is inerted with nitrogen. The revised

10 CFR 50.44 no longer requires light water reactors which operate with inerted containments to have hydrogen recombiners.

The proposed changes to the design certification to downgrade the Containment Atmospheric Monitoring System hydrogen and oxygen monitors from safety-related to non-safety-related are based on the elimination of the hydrogen recombiners and that hydrogen and oxygen monitors are no longer required to mitigate design basis accidents. Therefore, the hydrogen and oxygen monitors do not meet the definition of a safety-related component as defined in 10 CFR 50.2. As part of the rulemaking to revise 10 CFR 50.44, the Commission concluded that hydrogen monitoring is not the primary means of monitoring beyond design basis accidents. The Commission also determined that Category 2, as defined in Regulatory Guide 1.97, is an appropriate classification for the oxygen monitors because the monitors are required to verify the status of the inert containment. Oxygen monitoring is not the primary means of indicating a significant abnormal degradation of the inert containment. Section 4 of Attachment 2 to SECY-00-0198, "Status Report on Study of Risk-Informed Changes to 10 CFR 50.44 (Combustible Gas Control for Nuclear Power Plants)" found that hydrogen monitors were not risk significant. In addition, oxygen monitors have not been shown in PRA to be risk significant. The hydrogen and oxygen monitoring equipment requirements no longer meet any of the four criteria in 10 CFR 50.36 (c)(2)(ii) for retention in the generic Technical Specifications and, therefore, may be relocated to other licensee-controlled documents.

9.0 References

- (1). Regulatory Guide 1.7, Revision 3, "Control of combustible gas concentrations in containment," March 2007.
- (2). 10 CFR 50.44, "Combustible gas control for nuclear power reactors," October 16, 2003.
- (3). SECY-00-0198, "Status Report on Study of Risk-Informed Changes to the Technical Requirements of 10 CFR Part 50 (Option 3) and Recommendations on Risk-Informed Changes to 10 CFR 50.44 (Combustible Gas Control)," September 14, 2000.
- (4). Regulatory Guide 1.97, Revision 4, "Criteria for Accident Monitoring Instrumentation for Nuclear Power Plants," June 2006.

Appendix A

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Justification for Changes to the Generic DCD

Justification for Changes to the Generic DCD

As discussed in this Licensing Topical Report (LTR), the proposed departures pertain to certified design material in Tier 1. This LTR also includes exemptions to generic Technical Specifications (TS) changes, and associated Tier 2 changes to the ABWR DCD. The changes to Tier 1 and the exemption to generic TS require NRC approval. This LTR demonstrates that the proposed changes meet the requirements for a design certification amendment per the proposed revision to 10 CFR 52.63(a).

10 CFR 52.63(a)(1)(vi) (as proposed in SECY-06-220) allows for a change to a generic DCD if the change "Contributes to increased standardization of the certification information." As discussed below, the proposed changes to the generic DCD satisfy this criterion.

The proposed changes involve the implementation of a revision to 10 CFR 50.44 requirements and are intended to be generic and applicable to all COL applicants that reference the ABWR design certification. The changes permitted by the revision to 10 CFR 50.44 were not available during the ABWR design certification. In particular, the revised regulations permit eliminating the hydrogen recombiners and modifying requirements applicable to containment atmosphere monitoring. As discussed in this Licensing Topical Report, the proposed changes comply with the revision to 10 CFR 50.44 regulations. At least one prospective COL applicant (i.e., the COL applicant for South Texas Project Units 3 and 4) intends to implement the proposed departures from the ABWR DCD. Furthermore, it may be expected that other COL applicants will also desire to implement the proposed departures.

Given the generic nature of these proposed changes and the fact that at least one COL applicant intends to make the changes, it would contribute to increased standardization if the NRC were to make a generic change to the DCD to incorporate these proposed changes. Therefore, the proposed changes satisfy the criteria in 10 CFR 62.63(a)(1)(vi).

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Appendix B

ABWR DCD Tier 1 Marked Changes

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2.12.13 Emergency Diesel Generator System

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2.12.14 Vital AC Power Supply

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- 2.12.15 Instrument and Control Power Supply
- 2.12.16 Communication System
- 2.12.17 Lighting and Servicing Power Supply
- 2.13 Power Transmission
	- 2.13.1 Reserve Auxiliary Transformer (2.12.1)
- 2.14 Containment and Environmental Control Systems
	- 2.14.1 Primary Containment System
	- 2.14.2 Containment Internal Structures (2.14.1)
	- 2.14.3 Reactor Pressure Vessel Pedestal (2.14.1)
	- 2.14.4 Standby Gas Treatment System
	- 2.14.5 PCV Pressure and Leak Testing Facility
	- 2.14.6 Atmospheric Control System
	- 2.14.7 Drywell Cooling System
	- 2.14.8 Flammability-Control-System
	- 2.14.9 Suppression Pool Temperature Monitoring System
- 2.15 Structures and Servicing Systems
	- 2.15.1 Foundation Work (2.15.10)
	- 2.15.2 Turbine Pedestal (2.15.11)
	- 2.15.3 Cranes and Hoists
	- 2.15.4 Elevator
	- 2.15.5 Heating, Ventilating and Air Conditioning
	- 2.15.6 Fire Protection System
	- 2.15.7 Floor Leakage Detection System
	- 2.15.8 Vacuum Sweep System
	- 2.15.9 Decontamination System
	- 2.15.10 Reactor Building
	- 2.15.11 Turbine Building
	- 2.15.12 Control Building
	- 2.15.13 Radwaste Building
	- 2.15.14 Service Building
- 2.16 Yard Structures and Equipment
	- 2.16.1 Stack
	- 2.16.2 Oil Storage and Transfer System
- 2.17 Emergency Planning
	- 2.17.1 Emergency Response Facilities

10CFR50.44 was revised on October **16,** 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

2.2.6 Remote Shutdown System

Design Description

The Remote Shutdown System (RSS) provides remote manual control of safety-related systems to bring the reactor to hot shutdown and subsequent cold shutdown conditions from outside the main control room (MCR). Figure 2.2.6 shows the basic system configuration and scope.

The RSS has two divisional panels and associated controls and indicators for interfacing with the following systems:

- (1) Residual Heat Removal (RHR) System
- (2) High Pressure Core Flooder (HPCF) System
- (3) Nuclear Boiler System (NBS)
- (4) Reactor Service Water (RSW) System
- (5) Reactor Building Cooling Water (RCW) System
- (6) Electrical Power Distribution (EPD) System
- (7) Atmospheric Control (AC) System
- (8) Emergency Diesel Generator **(DG)**
- (9) Make-up Water System (Condensate), (MUWC)
- (10)-Flammability-Gontrol-System-(FCS)-
- (11) Suppression Pool Temperature Monitoring (SPTM) System

RSS controls and indicators are hard-wired direct to the interfacing components and sensors.

The RSS is classified as a Class **IE** safety-related system.

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Operation of transfer switches on the RSS panel overrides and isolates the controls from the MCR and transfers control to the RSS. Transfer switch actuation causes alarms in the MCR. Indications required for plant shutdown are provided on the RSS panels as shown on Figure 2.2.6.

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1OCFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

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Figure 2.4.1b Residual Heat Removal System (RHR-B) **0-**

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Residual Heat Removal System

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(4) Isolation of Reactor Building Heating, Ventilating and Air Conditioning (HVAC) System on a signal indicating high drywell pressure, low reactor water level, high radiation in the secondary containment or high radiation in the fuel handling area.

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- (5) Isolation of containment purge and vent lines on a signal indicating high drywell pressure, low reactor water level, high radiation in the secondary containment or high radiation in the fuel handling area.
- (6) Isolation of the Reactor Building Cooling Water (RCW) System and of the HVAC Normal Cooling Water (HNCW) System lines on a signal indicating high drywell pressure or low reactor water level.
- (7) Isolation of the Residual Heat Removal (RHR) System shutdown cooling system loops on a signal indicating high reactor pressure or low reactor water level. Also, each RHR shutdown cooling division is individually isolated on a signal indicating high ambient temperature in its respective equipment area.
- (8) Isolation of the Reactor Core Isolation Cooling (RCIC) System steamline to the RCIC turbine on a signal indicating high steam flow in the RCIC line, low steam pressure in the RCIC line, high RCIC turbine exhaust pressure, or high ambient temperature in the RCIC equipment area.
- (9) Isolation of the Suppression Pool Cleanup (SPCU) System on a signal indicating high drywell pressure or low reactor water level.
- (10)—Isolation-of-the-Flammability-Control-System-(FCS)-on-a-signal-indicating-high
drywell-pressure-or-low-reactor-water-level-
- (11) Isolation of the drywell sump low conductivity waste (LCW) and high conductivity waste (HCW) discharge lines on a signal indicating high drywell pressure or low reactor water level. Also, each discharge line is individually isolated on a signal indicating high radioactivity in the discharged liquid waste; only one channel is used for this function.
- (12) Isolation of the LDS fission products monitor drywell sample and return lines on a signal indicating high drywell pressure or low reactor water level.
- (13) The LDS provides to the neutron monitoring system a signal indicating a high drywell pressure or low reactor water level.

Separate manual controls in the control room are provided in LDS design for logic reset, MSIV operational control, MSIV partial closure tests, and for manual isolation of primary and secondary containment.

1OCFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

Leak Detection and Isolation System

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Table 2.7.1a Main Control Room Panels Fixed Position Alarms, Displays and Controls (Continued)

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recombiners) for plants with inerted containments.

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Table **2.11.3b** Reactor Building Cooling Water Cooling Loads Division B

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 \star Some of these cooling loads are serviced by only one or two RCW divisions. These components may be reassigned to other RCW divisions if redundancy and divisional alignment of supported and supporting systems is maintained and the design basis cooling capacity of the RCW divisions is assured.

- t Equipment does not receive RCW in this mode.
- 4: Equipment receives RCW in this mode. **'**
- *f* HECW refrigerators, room coolers (RHR, HPCF, SGTS, FCS₇ CAMS), RHR and HPCF motor bearing and seal coolers, and CAMS cooler.
- ** Includes FPC room cooler. 10CFR50.44 was

revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

Table 2.11.3c Reactor Building Cooling Water Cooling Loads Division **C**

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 \ast Some of these cooling loads are serviced by only one or two RCW divisions. These components may be reassigned to other RCW divisions if redundancy and divisional alignment of supported and supporting systems is maintained and the design basis cooling capacity of the RCW divisions is assured.

- t Equipment does not receive RCW in this mode.
- **f** Equipment receives RCW in this mode. Rm, 436

f HECW refrigerators; SGTS and-FCS room coolers; room coolers, motor bearing coolers, and mechanical seal coolers for RHR and HPCF.

100%.FR5O.44 was revised on October 16. 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

2.14.8-Flammability-Control-System

Design-Description

The Flammability Control System (FCS) is provided to control the potential buildup of hydrogen-and-oxygen-in-the-containment-from-radiolysis-of-water-after-a-design-basis loss-of-coolant-accident-(LOCA). The-system-consists-of-two-independent-and redundant-hydrogen-and-oxygen-recombiners. Gooling-water-required-for-operation-of the system after a LOCA is taken from the Residual Heat Removal (RHR) System. Figure 2.14.8 shows-the-basic-system-configuration-and-scope.

The-FGS-is-classified-as-safety-related.

Each-mechanical-division-of-the-FGS-(Divisions-B-and-G)-is-physically-separated-from the-other-division.

The FGS-has-the-following-displays-and-controls-in-the-main-control-room:

- \leftrightarrow Gontrols and status indication for the valves shown on Figure 2.14.8.
- Gontrols and status-indication-for-the-recombiner unit. (2)

FCS-components-with-display-and-control-interfaces-with-the-Remote-Shutdown-System (RSS) is shown on Figure 2.14.8.

The safety related electrical equipment shown on Figure 2.14.8, and included in the recombiner units, is qualified for a harsh environment.

The-motor-operated-valves-(MOVs)-shown-on-Figure 2.14.8 and-active safety-related MOVs-in-the-recombiners, if any, have-active-safety-related-functions-to-both-open-and close, and perform these functions under differential pressure, fluid flow, and temperature-conditions.

The check valves (CVs) shown on Figure 2.14.8 have active safety related functions to both-open-and-closer-under-system-pressure,-fluid-flow,-and-temperature-conditions.

The-pneumatic valves-shown-on-Figure 2.14.8-fail-to-the-closed-position-in-the-event-of loss-of-pneumatic-pressure-or-loss-of-electrical-power-to-the-valve-actuating-solenoids-

Inspections, Tests, Analyses and Acceptance Criterial

Table 2.14.8 provides a definition of the inspections, tests, and/or analyses, together with associated acceptance criteria, which will be undertaken for the FCS.

> 10CFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

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10CFR50.44 was revised on October 16, 2003 to no longer require hydrogen Forte Figure Hydrogen

control systems (i.e.,

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recombiners) for plants

with inerted containments.

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(3) R/B Safety-Related Diesel Generator HVAC System.

The Reactor Building HVAC System includes the following non-safety-related systems:

- (1) R/B Secondary Containment HVAC System.
- (2) R/B Primary Containment Supply/Exhaust System.
- (3) R/B Main Steam Tunnel HVAC System.
- (4) R/B Non-Safety-Related Equipment HVAC System.
- (5) R/B Reactor Internal Pump (RIP) Adjustable Speed Drive (ASD) Control Panel HVAC System

R/B Safety-Related Equipment **HVAC** System

The R/B Safety-Related Equipment HVAC System provides cooling of safety-related equipment areas, and consists of independent fan coil units. Figure 2.15.5e shows the basic system configuration and scope.

The R/B Safety-Related Equipment HVAC System is classified as safety-related.

The Residual Heat Removal (RHR) System, High Pressure Core Flooder (HPCF) System and Reactor Core Isolation Cooling (RCIC) System pump room FCUs are automatically initiated upon startup of their respective room process pump. The Containment Atmospheric Monitoring System (CAMS) and Standby Gas Treatment System (SGTS) room FCUs are automatically initiated upon isolation of the Reactor Building Secondary Containment HVAC System. The Flammability Control System (FCS)-room-FGUs are also-initiated-upon-a-manual-FCS-start-signal.

The temperature in the safety-related equipment areas is maintained below 40'C, except for the RHR, HPCF, and RCIC pump rooms, which are maintained below 66°C during pump operation.

The R/B Safety-Related Equipment HVAC System is classified as Seismic Category I. The R/B Safety-Related Equipment HVAC System is located in the Reactor Building.

Each of the three divisions of the R/B Safety-Related Equipment HVAC System is powered from the respective Class **IE** division as shown on Figure 2.15.5e. In the R/B Safety-Related Equipment HVAC System, independence is provided between Class **IE** divisions, and also between the Class **IE** divisions and non-Class 1E equipment.

Each mechanical division (Divisions A, B, C) of the R/B Safety-Related Equipment HVAC System is physically separated from the other divisions.

10CFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

Figure 2.15.5e Reactor Building Safety-Related Equipment **HVAC** System

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Heating, Ventilating and Air Conditioning Systems

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Figure 2.15.10a Reactor Building Arrangement-Section **A-A** { { {Security-Related Information - Withheld Under 10 CFR 2.390}}}

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Figure **2.15.10j** Reactor Building Arrangement, Floor 1F-Elev. **12300** mm { { {Security-Related Information - Withheld Under **10** CFR 2.390} }

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Figure 3.2i Reactor Building Radiation Zone Map for Full Power and Shutdown Operations, Floor 1F-Elevation 12300 mm

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Appendix **C**

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ABWR DCD Significant Tier 2 Marked Changes
List of Acronyms (Continued)

List of Acronyms xi

NEDO-33330 Revision 0 *ABWR DCD Acronyms*

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1.2.2.4.3 Containment Atmospheric Monitoring System

The Containment Atmospheric Monitoring System (CAMS) measures, records and alarms the radiation levels and the oxygen and hydrogen concentration levels in the primary containment under post-accident conditions. It is automatically-put in-service upon-detection-of-LOCA-conditions. $|H2 \& Q2$ monitors are no longer required to mitigate

1.2.2.5 Core Cooling System design-basis accidents

In the event of a breach in the RCPB that results in a loss of reactor coolant, three independent divisions of ECCS are provided to maintain fuel cladding below the temperature limit as defined by IOCFR50.46. Each division contains one high pressure and one low pressure inventory makeup system.

1.2.2.5.1 Residual Heat Removal System

The Residual Heat Removal (RHR) System is a system of pumps, heat exchangers, and piping that fulfills the following functions:

- (1) Removes decay and sensible heat during and after plant shutdown.
- (2) Injects water into the reactor vessel following a LOCA to reflood the core in conjunction with other core cooling systems (Subsection 5.5.1).
- (3) Removes heat from the containment following a LOCA to limit the increase in containment pressure. This is accomplished by cooling and recirculating the suppression pool water by containment sprays.

1.2.2.5.1.1 Low Pressure Flooder

Low pressure flooding is an operating mode of each RHR system, but is discussed here because the low pressure flooder (LPFL) mode acts in conjunction with other injection systems. LPFL uses the RHR pump loops to inject cooling water into the pressure vessel. LPFL operation provides the capability of core flooding at low vessel pressure following a LOCA in time to maintain the fuel cladding below the prescribed temperature limit.

1.2.2.5.1.2 Residual Heat Removal System Containment Cooling

The RHR System is placed in operation to: **(I)** limit the temperature of the water in the suppression pool and the atmospheres in the drywell and suppression chamber following a design basis LOCA; (2) control the pool temperature during normal operation of the safety/relief valves and the RCIC System; and (3) reduce the pool temperature following an isolation transient. In the containment cooling mode of operation, the RHR main system pumps take suction from the suppression pool and pump the water through the RHR heat exchangers, where cooling takes place by transferring heat to the service water. The fluid is then discharged back either to the

In addition to the above functions, LDS monitors leakage inside the drywell from the following sources and annunciates the abnormal leakage levels in the control room:

- (1) Fission products releases
- (2) Condensate flow from the drywell air coolers
- (3) Drywell sump level changes
- (4) Leakages from valve stems equipped with leak-off lines

Other leakages from the FMCRDs, the SRVs and from the reactor vessel head seal flange are monitored by their respective systems.

1.2.2.5.4 Reactor Core Isolation Cooling System

The RCIC System provides makeup water to the reactor vessel when the vessel is isolated and is also part of the emergency core cooling network. The RCIC System uses a steamdriven turbine-pump unit and operates automatically in time and with sufficient coolant flow to maintain adequate water level in the reactor vessel for events defined in Section 5.4.

One division contains the RCIC System, which consists of a steam-driven turbine which drives a pump assembly and the turbine and pump accessories. The system also includes piping, valves, and instrumentation necessary to implement several flow paths. The RCIC steam supply line branches off one of the main steamlines (leaving the RPV) and goes to the RCIC turbine with drainage provision to the main condenser. The turbine exhausts to the suppression pool with vacuum breaking protection. Makeup water is supplied from the condensate storage tank (CST) or the suppression pool with preferred source being the CST. RCIC pump discharge lines include the main discharge line to the feedwater line, a test return line to the suppression pool, a minimum flow bypass line to the suppression pool and a cooling water supply line to auxiliary equipment.

Following a reactor scram, steam generation in the reactor core continues at a reduced rate due to the core fission product delay heat. The turbine condenser and the feedwater system supply the makeup water required to maintain reactor vessel inventory.

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10CFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

1.2.2.15.5 PCV Pressure and Leak Testing Facility

The PCV pressure and leak testing facility is a special area just outside the containment. It provides instrumentation for conducting the PCV pressure and integrated leak rate tests.

1.2.2.15.6 Atmospheric Control System

The Atmospheric Control System is designed to establish and maintain an inert atmosphere within the primary containment during all plant operating modes except during plant shutdown for refueling or maintenance.

The Atmospheric Control System is summarized in Subsection 6.2.5.2.1.

1.2.2.15.7 Drywell Cooling System

The Drywell Cooling System is summarized in Subsection 9.4.9.2.

1.2.2.15.8 Flammability Control System

A-recombiner-system-is-provided-to-control-the-concentration-of-hydrogen-and-oxygen produced-by-metal-water-reaction-and-radiolysis-following-a-design-basis-accident-in-the primary containment.

1.2.2.15.9 Suppression Pool Temperature Monitoring System

The Suppression Pool Temperature Monitoring (SPTM) System is summarized in Subsection 7.6.1.7.1.

1.2.2.16 Structures and Servicing Systems

1.2.2.16.1 Foundation Work

The analytical design and evaluation methods for the containment and Reactor Building walls, slabs and foundation mat and foundation soil are summarized in Subsection 3.8.1.4.1.1.

1.2.2.16.2 Turbine Pedestal

The description for the turbine pedestal is the same as that for foundation work in Subsection 3.8.1.4.1.1.

1.2.2.16.3 Cranes and Hoists

The cranes and hoists are summarized in Subsection 9.1.

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Figure **1.2-8** Reactor Building, Arrangement Plan at Elevation 12300mm **{I{** {Security-Related Information - Withheld Under **10** CFR 2.390111

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Table **1.7-1** Piping and Instrumentation and Process Flow Diagrams

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Table **1.8-20** NRC Regulatory Guides Applicable to ABWR

probability of steamline flooding by ECCS is extremely low. There is no high drywell pressure signal that would inhibit this logic system.

In the ABWR design, each of three RHR shutdown cooling lines has its own separate containment penetration and its own separate source of suction from the reactorvessel. Alternate shutdown using the SRV is therefore not required for the ABWR in order to meet single failure rules. Hence, the ABWR does not require SRV testing with liquid under low pressure conditions associated with this event as required in past BWRs.

1A.2.10 Relief and Safety Valve Position Indication **[II.D.31**

NRC Position

Reactor Coolant System relief and safety valves shall be provided with a positive indication in the control room derived from a reliable valve-position detection device or a reliable indication of flow in the discharge pipe.

Response

The ABWR Standard Plant SRVs are equipped with position sensors which are qualified as Class **IE** components. These are used to monitor valve position.

In addition, the downstream pipe from each valve line is equipped with temperature elements which signal the annunciator and the plant process computer when the temperature in the tailpipe exceeds the predetermined setpoint.

These sensors are shown on Figure 5.1-3 (Nuclear Boiler System P&ID).

1A.2.11 Systems Reliability **[I1.E.3.21**

This TMI action plan item superseded by USI A-45. USI A-45 is addressed in Appendix 19B.

1A.2.12 Coordinated Study of Shutdown Heat Removal Requirements **[I1.E.3.3]**

This TMI action plan item superseded by **USI** A-45. USI A-45 is addressed in Appendix 19B.

1A.2.13-Containment-Design-Dedicated-Penetration-[II.E.4.1]

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revised on October **Foir-plan-terlenland** - the Federal - three-terminalism - ediea-ediea-ediea-ediea-ediea-ediea 16, 2003 to no 1longer require :hydrogen control systems (i.e., $\overline{}$ Response 'hydrogen recombiners) for iplants with inerted **intervalsion and the community of the c-i 0** c-10 *Response to TMI Related Matters* ,containments.

containment penetrations so that, assuming a single failure, the recombiner systems can be connected to the containment atmosphere.

 F lammability $A-F$ lammability-Control-System-is-provided-to-control-the-concentration-of-oxygen-in Control System, \parallel the primary containment. The FCS utilizes two permanently installed recombiners

located in the secondary containment. The FCS is operable in the event of a single active-failure. The-FGS-is-described-in-Subsection-6.2.5.

1A.2.14 Containment Design-Isolation Dependability [II.E.4.2]

NRC Position

- (1) Containment isolation system designs shall comply with the recommendations of the Standard Review Plan, Subsection 6.2.4 (i.e., that there be diversity in the parameters sensed for the initiation of containment isolation).
- (2) All plant personnel shall give careful consideration to the definition of essential and non-essential systems, identify each system determined to be non-essential, describe the basis for selection of each essential system, modify their containment isolation designs accordingly, and report the results of the reevaluation to the NRC.
- (3) All nonessential systems shall be automatically isolated by the containment isolation signal.
- (4) The design of control systems for automatic containment isolation valves shall be such that resetting the isolation signal will not result in the automatic reopening of containment isolation valves. Reopening of containment isolation valves shall require deliberate operator action.
- (5) The containment setpoint pressure that initiates containment isolation for non-essential penetrations must be reduced to the minimum compatible with normal operating conditions.
- (6) Containment purge valves that do not satisfy the operability criteria set forth in Branch Technical Position CSB 6-4 or the Staff Interim Position of October 23, 1979 must be sealed closed as defined in SRP 6.2.4, Item II.6.f during operational conditions 1, 2, 3, and 4. Furthermore, these valves must be verified to be closed at least every 31 days.
- (7) Containment purge and vent isolation valves must close on a high radiation signal.

Response

 (1) The isolation provisions described in the Standard Review Plan, Subsection 6.2.4 (i.e., that there be diversity in the parameters sensed for the initiation of containment isolation) were reviewed in conjunction with the ABWR Standard Plant design. It was determined that the ABWR Standard Plan is designed in accordance with these recommendations of the SRP.

1AA.3.2 Vital Area and Systems

A vital area is any area which will or may require occupancy to permit an operator to aid in the mitigation of or recovery from an accident. Areas which must be considered as vital after an accident are the control room, technical support center, sampling station, sample analysis area and the HPIN nitrogen supply bottles.

10CFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

The vital areas also include consideration (in accordance with NUREG- 0737, II.B.2) of the post LOGA-hydrogen-control-system, containment isolation reset control area, manual ECCS alignment area, motor control center and radwaste control panels. However, the ABWR design does not require a containment isolation reset control area or a manual ECCS alignment area, as these functions are available from the control room. Those vital areas which are normally areas of mild environment, allowing unlimited access, are not reviewed for access.

Essential systems specific to the ABWR to be considered post-accident are those for the ECCS, fission product and eombustible-gas control and the auxiliary systems necessary for their operation (i.e., instrumentation, control and monitoring, power, cooling water, and air cooling).

1AA.3.3 Post Accident Operation

Post-accident operations are those necessary to (1) maintain the reactor in a safe shutdown condition, (2) maintain adequate core cooling, (3) assure containment integrity, and (4) control radioactive releases within 10CFR100 guidelines.

Many of the safety-related systems are required for reactor protection or to achieve a safe shutdown condition. However, they are not necessarily needed once a safe shutdown condition is achieved. Thus, the systems considered herein are the engineered safety features (ESF) (Chapter 6) used to maintain the plant in a safe shutdown condition.

For purposes of this review, the plant is assumed to remain in the safe shutdown condition.

The basis for this position is that the foundation of plant safety is the provision of sufficient redundancy of systems and logic to assure that the plant is shut down and that adequate core cooling is maintained. Necessary shutdown and post-accident operations are performed from the control room, except for the post-accident sampling station, the sample analysis area, and two manual nitrogen reserve supply valves.

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10CFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

safety-related, or included in the systems of Table 3.2-1. It does however, represent principal components which are needed to operate, generally during post accident operations. For example, most ECCS valves are normally open, and only a pump discharge valve needs to open to direct water to the reactor. Similarly, the instrument transmitters shown are those which would provide information on long-term system performance post-accident. Control room instrumentation is not listed, since it is all in an accessible area where no irradiation degradation would be expected. Passive elements such as thermocouples and flow sensors are not listed although they are environmentally qualified. The components listed under main steam (B21) are those for ECCS function or monitoring reactor vessel level. Suppression pool level is included

1AA.5.1.3 with the HPCF instrumentation.
 Combustible Gas Control Systems and Auxiliaries *-during*

Flammability control in the primary containment is achieved by an inert atmosphere during all plant operating modes except operator access for refueling and maintenance and a-recombiner-system-to-control-oxygen-produced-by-radiolysis. The high pressure nitrogen (HPIN) gas supply is described in Subsection 1.2.2.12.13. The Containment Atmospheric Monitoring System (CAMS) measures and records containment oxygen/hydrogen concentrations under post-accident conditions. It is automatically initiated by detection of a LOCA (Subsection 7.6.1.6). Table IAA-3 lists the combustible gas control principal components and their locations.

1AA.5.1.4 Fission Product Removal and Control Systems and Auxiliaries

Engineered Safety Feature (ESF) filter systems are the Standby Gas Treatment System (SGTS) and the control building Outdoor Air Cleanup System. Both consist of redundant systems designed for accident conditions and are controlled from the control room. The SGTS filters the gaseous effluent from the primary and secondary containment when required to limit the discharge of radioactivity to the environment. The system function is described in Subsection 1.2.2.15.4.

A portion of the Control Building heating ventilating and air-conditioning (HVAC) provides detection and limits the introduction of radioactive material and smoke into the control room. This portion is described Subsection 9.4.1.1.3.

The CAMS described in the previous section also measures and records containment area radiation under post-accident conditions. A post-accident sampling system (PASS) obtains containment atmosphere and reactor water samples for chemical and radiochemical analysis in the laboratory. Delayed sampling, shielding, remote operated valves and sample transporting casks are utilized to reduce radiation exposure. The samples are manually transported between the PASS room in the Reactor Building and the analysis laboratory in the service building. The system is described in

Table 1AA-3 Post-Accident Combustible Gas Control Systems and Auxiliaries

(PC)-Primary Containment

(SC)-Secondary Containment

(RB)-Reactor Building outside (Secondary Containment)

10CFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

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Table **3.2-1** Classification Summary (Continued)

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Table **3.2-1** Classification Summary (Continued)

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Table **3.9-8** Inservice Testing Safety-Related Pumps and Valves (Continued)

Table **3.9-8** Inservice Testing Safety-Related Pumps and Valves (Continued)

Table 3.9-8 Inservice Testing Safety-Related Pumps and Valves (Continued)

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Figure 3H.4-7 Location of Walls Exposed to HELB, **El. 12300** mm **{I{** {Security-Related Information - Withheld Under **10** CFR 2.390}1}}

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Table **31-13** Thermodynamic Environment Conditions Inside Reactor Building (Secondary Containment) Plant Accident Conditions' (Continued)

1. Systems or components located in the Reactor Building outside the secondary containment or in other buildings and required to support the equipment listed in this table during accident condition will be qualified to the conditions specified in the equipment qualification design criteria table for the respective area or building.

2. Time means the time from the occurrence of LOCA.

3. The 102.97 kPaG equipment qualification pressure specified is the structural design basis for the respective rooms (see Subsection 6.2.3.3) in which this equipment is located and not the saturation pressure associated with the equipment qualification temperature.

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Makeup Water (Condensate) System upstream of the injection valve for the purpose of providing a filling and flushing water source. Another interface with MUWC is between the pair of valves to the FPC System. The MUWC System is discussed in Section 3MA.11, where it is explained how certain MUWC upgrades were made that provide an open path to the CST. The MUWC line cannot be pressurized because of the open communication to the CST, and the CST is vented to atmosphere. There is no source to pressurize the MUWC line because of closed valves in the RHR System's URS region.

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- High Conductivity Waste (Radwaste) for drainage located up stream of the pump suction. HCW upgrades are discussed in the Radwaste System, Section 3MA.13.
- Low Conductivity Waste, (Radwaste) at the end of a branch off of the loop B mainline down stream of the RHR heat exchanger. The LCW upgrades are discussed in the Radwaste System, Section 3MA.13.
- Sampling System at the outlet of the RHR heat exchanger. The Sampling System's \blacksquare design pressure exceeds the URS design pressure without upgrade.
- Fuel Pool Cooling and Cleanup System on an RHR System discharge branch. FPC п System upgrades are discussed in Section 3MA.8.
- Flammability Control System branches off the main discharge line downstream of \blacksquare the-branch-that-returns-to-the-suppression-pool. The-FCS-design-pressure-exceeds the URS design pressure without upgrade.
- The Fire Protection System and the fire truck connection provide water for the Alternating Current (AC) Independent Water Addition piping of RHR loop C upstream of the RPV injection, wetwell spray line, and drywell spray line. The Fire Protection System piping is designed for 1.37 MPaG and is protected from over pressure by two locked closed block and bleed valves, RHR-F101 and RHR-F102, and a drain pipe between these valves vented to the HCW sump in the Reactor Building. This design very effectively prevents reactor pressure from reaching the Fire Protection System. No upgrade to URS is practical or appropriate for the extensive piping of the Fire Protection System since the system function is not related to ISLOCA nor is its interconnection a normal plant operational pathway.

3MA.2.3 Upgraded Components - RHR System

A detailed listing of the components upgraded for the RHR System follows, including identification of those interfacing system components not requiring upgrade.

Design Control Document Tier 2

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* Head spray valve only

FIGURE 5.4-10 RESIDUAL HEAT REMOVAL SYSTEM P&ID (Sheet 4 of 7)
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List of Figures (Continued)

exception of the makeup valves (50A), all containment purge system CIVs are in closed position during normal reactor operation. The purge and vent valves are open only during the inerting and de-inerting modes. All containment purge system CIVs automatically close upon receipt of containment isolation signal. Also, these valves are outside containment and accessible should manual actuation be required. Since this arrangement has adequate redundancy, and independence and is not unduly vulnerable to common mode failures, it is not necessary to have redundant and independent CIVs as would be required by Criterion 54.

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6.2.4.4 Test and Inspections

10CFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

The Containment Isolation System is scheduled to undergo periodic testing during reactor operation. The functional capabilities of power-operated isolation valves are tested remote-manually from the control room. By observing position indicators and changes in the affected system operation, the closing ability of a particular isolation valve is demonstrated.

Air-testable check valves are provided on influent emergency core cooling lines of the HPCF and RHR Systems whose operability is relied upon to perform a safety function.

A discussion of testing and inspection of isolation valves is provided in Subsection 6.2.1.6. Instruments are periodically tested and inspected. Test and/or calibration points are supplied with each instrument. Leakage integrity tests shall be performed on the containment isolation valves with resilient material seals at least once every three months.

6.2.5 Combustible Gas Control in Containment

The Atmospheric Control System (ACS) is provided to establish and maintain an inert atmosphere within the primary containment during all plant operating modes except during shutdown for refueling or equipment maintenance and during limited periods of time to permit access for inspection at low reactor power. The Flammability-Control System-(FCS)-is-provided-to-control-the-potential-buildup-of-hydrogen-and-oxygen-from design-basis metal-water-reaction-and-radiolysis of water. The objective of these-systems is-to-preclude-combustion-of-hydrogen-causing-damage-to-essential-equipment-and structures. The GOL applicant is required to provide a comparison of costs and benefits for any optional alternate-system of hydrogen-control.

6.2.5.1 Design Bases

Since there is no design requirement for the ACS of FCS in the absence of a LOCA and since there is no design basis accident in the ABWR that results in core uncovery or fuel failures, the following requirements mechanistically assume that a LOCA producing the design basis quantities of hydrogen and oxygen has occurred. Following are criteria that serve as the bases for design:

- (1) The hydrogen generation from metal-water reaction is defined in Regulatory Guide 1.7.
- (2) The hydrogen and oxygen generation from radiolysis is defined in Regulatory Guide 1.7.
- (3) The ACS establishes an inert atmosphere throughout the primary containment following an outage or other occasions when the containment has been purged with air to an oxygen concentration greater than 3.5%.
- (4) The ACS maintains the primary containment oxygen concentration below the maximum permissible limit per Regulatory Guide 1.7 during normal, abnormal, and accident conditions in order to assure an inert atmosphere.
- The ACS also maintains a slightly positive inert gas pressure in the primary (5) containment during normal, abnormal and accident conditions to prevent air (oxygen) leakage into the inerted volumes from the secondary containment, and provides non-safety-related monitoring of the oxygen concentration in the primary containment to assure a breathable mixture for safe personnel access. Essential safety-related monitoring is provided by the Containment Atmospheric Monitoring System (CAMS), as described in Chapter 7.
- (6) The drywell and the suppression chamber will be mixed uniformly after the design basis LOCA due to natural convection and molecular diffusion. Mixing will be further promoted by operation of the containment sprays.
- $(+7)$ The-FCS-is-capable-of-controlling-combustible-gas-concentrations-in-the containment atmosphere for the design bases LOGA without relying on purging-and-without-releasing-radioactive-material-to-the-environmentlis
- (8) The ACS and FCS-toget are designed to maintain an inert primary containment after the design-bases LOCA, assuming a single-active failure. The backup purge function need not meet this criterion.
- (9) Components of the ACS inside the Reactor Building are protected from postulated missiles and pipe whip, as required to assure proper action.
- (10) The ACS has the capability to withstand the dynamic effects associated with a safe shutdown earthquake without loss of isolation function.

10CFR50.44 was revised on October 16, 2003 to no llonger require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

- (11) The system is designed so that all components exposed to the primary containment atmosphere (i.e., inboard isolation valves) are capable of withstanding the temperature, humidity, pressure, and radiation transients resulting from a LOCA.
- (12) The ACS is non-safety class except as necessary to assure primary containment integrity (penetrations, isolation valves). The ACS and FGS are designed and built to the requirements specified in Section 3.2. lis.
- (13) The ACS includes a liquid nitrogen storage tank, vaporizer and heater along with the valves and piping carrying nitrogen to the containment, valves and piping from the containment to the SGTS and HVAC exhaust line, dedicated containment overpressure relief line with attached valves and rupture disk, non-safety oxygen monitoring, and all related instruments and controls. The ACS does not include any structures or housing supporting the aforementioned equipment or any ducting in the primary containment. Figure 6.2-39 shows the system P&ID.

The nitrogen supplied from the ACS shall be oil-free with a moisture content of less than 2.5 ppm. Filters are provided to remove particulates larger than 5 micrometers.

- (14) The system is designed to facilitate periodic inspections and tests. The ACS can be inspected or tested during normal plant conditions.
- (15) The primary containment purge system will aid in the long-term post-accident cleanup operation. The primary containment atmosphere will be purged through the SGTS to the outside environment. Nitrogen makeup will be available during the purging operation.
- (16) The ACS is also designed to release containment pressure before uncontrolled containment failure could occur.

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6.2.5.2 System Design

6.2.5.2.1 General

The FGS-and ACS are systems designed to control the environment within the primary containment. The-FCS-provides-control-over-hydrogen-and-oxygen-generated-following a-LOCA. In an-inerted-containment, mixing of any hydrogen-generated is not required. Any oxygen evolution from radiolysis is very slow such that natural convection and molecular diffusion is sufficient to provide mixing. Spray operation will provide further

revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

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makeup lines, compensating for leakage, provide a makeup flow of nitrogen to the containment. If a LOCA signal is received, the ACS valves close. Nitrogen purge from the containment occurs during shutdown for personnel access. Purging is accomplished with the containment inlet and exhaust isolation valves opened to the selected exhaust path and the nitrogen supply valves closed. Nitrogen is replaced by air in the containment (see Item (3) Shutdown-Deinerting below this subsection). The system has the following features:

- (1) Atmospheric mixing is achieved by natural processes. Mixing will be enhanced by operation of the containment sprays, which are used to control pressure in the primary containment.
- (2) The ACS primary containment nitrogen makeup maintains an oxygendeficient atmosphere $(\leq 3.5\%$ by volume) in the primary containment during normal operation.
- (3) The redundant oxygen analyzer system (CAMS) measures oxygen in the drywell and suppression chamber. Oxygen concentrations are displayed in the main control room. Description of safety-related display instrumentation for containment monitoring is provided in Chapter 7. Electrical requirements for equipment associated with the combustible gas control system are in accordance with the appropriate IEEE standards as referenced in Chapter 7.

In addition, the ACS provides overpressure protection to relieve containment pressure, as required, through a pathway from the wetwell airspace to the stack. The pathway is isolated during normal operation by a rupture disk.

The following modes of ACS operation are provided:

- (1) Startup-Inerting: Liquid nitrogen is vaporized with steam or electric heaters to a temperature greater than -7°C and is injected into the wetwell and the drywell. The nitrogen will be mixed with the primary containment atmosphere by the drywell coolers in the drywell and, if necessary, by the sprays in the wetwell.
- (2) Normal-Maintenance of Inert Condition: A nitrogen makeup system automatically supplies nitrogen to the wetwell and upper drywell to maintain a slightly positive pressure in the drywell and wetwell to preclude air leakage from the secondary to the primary containment. An increase in containment pressure is controlled by venting through the drywell bleed line.
- (3) Shutdown-Deinerting: Air is provided to the drywell and wetwell by the Reactor Building HVAC purge supply fan. Exhaust is through the drywell and wetwell exhaust lines to the plant vent, through the HVAC or SGTS, as required. During shutdown, purge air provides containment access ventilation.
- (4) Overpressure Protection: If the wetwell pressure increases to about 617.8 kPaG(Subsection 19E.2.8.1), the rupture disk will open. The overall containment pressure decreases as venting continues. Closing the two 250A air-operated butterfly valves re-establishes containment isolation as required.
- (5) ACS, except COPS, primary containment isolation valves, if open, (they are normally closed) are automatically closed if the drywell high pressure, or reactor low water level 3 setpoint is reached or if high radiation is detected in the exhaust flow. (See Table 5.2-6)

The following interfaces with other systems are provided:

(1) Residual Heat Removal System (RHR): The RHR System provides postaccident suppression pool cooling, as necessary, following heat dumps to the pool, including the exothermic heat of reaction released by the design basis metal-water reaction. This heat of reaction is very small and has no real effect on pool temperature or RHR heat exchanger sizing. The wetwell spray portion of the RHR may be activated during a LOCA help mixing by reducing pocketing. Wetwell spray would also serve to accelerate deaeration of the suppression pool water, though the impact of the dissolved oxygen on wetwell airspace oxygen concentration is very small. The-RHR-System-also-provides eooling-water-to-the-exhaust-flow-from-the-FCS.

10CFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

setpoint in a severe accident, combined with the already low core damage frequency and reliable containment heat removal, produces an extremely low probability of significant fission product release. In addition, the elapsed time to rupture disk opening is greater than 24 hours for most severe accident sequences.

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The net risk reduction associated with the implementation of the COPS system in the design of the ABWR is summarized in Table 19E.2-27 and Figure 19E.2-22. All sequences which would result in COPS operation were assumed to lead to failure of the drywell head. This may slightly over predict the probability of drywell head failure since there will be somewhat more time available for the recovery of containment heat removal if the COPS system were not present. Table 19E.2-26 indicates a low probability of RHR recovery in the interval between the time of COPS initiation and the time of drywell head failure if COPS were not present. For the case with firewater addition to the containment, the probability of RHR recovery during the period of interest is 4% . Therefore, no significant error is introduced into the calculation.

Table 19E.2-27 indicates that the probability of drywell head failure increases by a factor of 50 for sequences with core damage (Class I and III) if the COPS system is not present. For Class II sequences, the loss of containment heat removal may lead to core damage for those sequences which have drywell head failure. Since the probability of drywell head failure increases by a large factor without COPS system, the core damage probability associated with Class II events also increases by the same amount. Figure 19E.2-22 shows the probability of exceedence versus whole body dose at 0.81 kilometers for the ABWR and for the ABWR without the COPS system. The offsite dose is reduced as a result of the COPS implementation into the design.

6.2.5.2.7 Flammability-Control-System

10CFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

The FCS consists of two permanently installed, safety related thermal $\left(-1\right)$ hydrogen-recombiners-with-associated-piping, valves, controls-and instrumentation. The recombiner units are located in the secondary containment-and-controlled-from-the-main-control-room. Each-recombiner shown-in-Figure-6.2-40-removes-gas-from-the-drywell,-recombines-the-oxygen with-hydrogen, and returns the gas-mixture-along-with-the-condensate-to-the suppression-chamber. Each recombiner-unit is an integral-package consisting of a blower, electric heater, reaction chamber, water spray cooler, water separator, piping, valves, controls and instrumentation.

 $\left(2\right)$ During-operation-of-the-system,-gas-is-drawn-from-the-drywell-by-the-blower and-heated. Hydrogen and oxygen in the gas will be recombined into steam in the reaction chamber and condensed in the spray cooler. The condensate and-spray-water,-along-with-some-of-the-gas,-are-returned-to-the-wetwell. The rest of the gas-is-recycled-through-the-blower. Gooling-water-required-for

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10CFR50.44 was revised on October 16, 2003 to no llonger require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

operation of the system after a LOCA is taken from the RHR system. The cooling water is used to cool the water vapor and the residual gases leaving the recombiner prior to returning them to the containment.

- (3) All pressure containing equipment, including piping between components is considered an extension of the containment, and designed to ASME-Section **HI-Safety-Glass-2-requirements.-Independent-drywell-and-suppression** chamber-penetrations-are-provided-for-the-two-recombiners. Each penetration has two normally closed-isolation valves; one pneumatically operated and one-motor-operated. The system-is-designed to meet Seismic Gategory-I-requirements. The-recombiners-are-in-separate-rooms-in-the secondary containment and are-protected-from-damage-by-flood, fire, tornadoes-and-pipe-whip-
- (4) After-a-LOCA,-the-system-is-manually-actuated-from-the-control-room-when high-oxygen-levels-are-indicated-by-the-containment-atmospheric-monitoring system-(CAMS). (If hydrogen is not present, oxygen concentrations are controlled-by-nitrogen-makeup.)-Operation of either-recombiner will-provide effective-control-over-the-buildup-of-oxygen-generated-by-radiolysis-after-a design-basis-LOCA. Once-placed-in-operation-the-system-continues-to-operate until-it-is-manually-shut-down-when-an-adequate-margin-below-the-oxygen concentration-design-limit-is-reached-

6.2.5.3 Design Evaluation

The ACS is designed to maintain the containment in an inert condition except for nitrogen makeup needed to maintain a positive containment pressure and prevent air $(0₉)$ leakage from the secondary into the primary containment.

The primary containment atmosphere will be inerted with nitrogen during normal operation of the plant. Oxygen concentration in the primary containment will be maintained below 3.5% by volume measured on a dry basis.

During normal operation, nitrogen makeup and containment pressure control are accomplished using only the 50A supply lines. The large valves (550A) in the containment ventilation lines are closed and flow to the plant stack through the overpressure protection line (250A) is prevented by the rupture disk.

The following conditions assure that the large (550A) containment purge and vent lines will be isolated following a LOCA:

 (1) The valves remain closed at all times during normal operation and will only be opened for inerting or de-inerting at the beginning and end of a shutdown.

6.2.5.4 Tests and Inspections

Complete process systems are pressure tested to the maximum practicable extent. Piping systems will be hydrostatically tested in their entirety, utilizing available valves or temporary plugs. Hydrostatic testing of piping systems will be performed at a pressure 1.5 times the design pressure, but in no case at less than 519.8 kPaG. The test pressure will be held for a minimum of 30 minutes. Pneumatic testing may be substituted for hydrostatic testing in accordance with the applicable codes.

10CFR50.44 was revised on October 16, 2003 to no longer require 1hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted ,containments.

Preoperational testing will demonstrate the ability of the ACS to meet design requirements. Each valve will be exercised both opened and closed and position indication verified. Trip and alarm logic signals will also be checked. The tests assure correct functioning of all controls, instrumentation, compressors, recombiners, piping and valves. System reference characteristics, such as pressure differentials and flow rates, are documented during the preoperational tests and are used as base points for measurements in subsequent operational tests.

During plant operation, the ACS, its valves, instrumentation, wiring and other components outside the containment can be inspected visually at any time. Testing frequencies of the ACS components are generally correlated with testing frequencies of the associated controls and instrumentation. When a valve control is tested, the operability of that valve and its associated instrumentation are generally tested by the same action. In addition, inservice inspection and testing of all ASME Section III, Class 3 components is done in accordance with Subsections 6.6.5 and 3.9.6, respectively.

Preoperational tests of the ACS and FGS-are conducted during the final stages of plant construction prior to initial startup.

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The overpressure protection concept was designed to minimize any adverse impact on normal operation or maintenance. Initially, several rupture disks from a batch of rupture disk could be tested to verify the opening characteristics and setpoint. The disk would be replaced every five years according to normal industry practice. The installation of the disk would not impact containment leakage tests, since disk integrity is expected to be essentially perfect.

The overpressure protection valves would be tested during preoperational testing and periodically during inservice testing (Subsection 3.9.6), to verify their normally open position and their ability to close using AC power and pneumatic air.

6.2.5.5 Instrumentation Requirements

Separate inerting flow indication to both the drywell and wetwell are provided. Drywell pressure and makeup flow are monitored and recorded in the main control room. Additional drywell pressure instrumentation, with a lower setpoint, is provided in addition to the redundant, safety-grade drywell pressure instrumentation of the Nuclear

Table **6.2-7** Containment Isolation Valve Information*

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 $\pmb{\ast}$ This table responds to NRC Questions 430.35, 430.50b. 430.50c, 430.50d and 430.50f regarding containment isolation provisions for fluid system lines and for fluid instrument lines penetrating containment within the scope of the ABWR Standard Plant. Locked closed isolation valves are identified on the P&IDs. The containment information is presented separately for each system for the MPL numbers given below.

10CFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for *Containment Systems* plants with inerted *6.2-124* C-35 containments.

Table-6.2-7 Containment-Isolation-Valve-Information **Flammability-Control-System**

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Table-6.2-7-Containment-Isolation-Valve-Information **Flammability-Control-System**

10CFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.
- (o) Furthermore, these valves are subject to ASME leak rate tests as in (k) above.
- (p) Rupture discs are normally closed and sealed from leakage. The opening setpoint of these rupture discs is higher than primary containment test pressures. Additionally, these rupture discs are subject to the Type A test.
- (q) SPCU suction line is always filled with water, since it is located below the suppression pool water level and is sealed from the containment atmosphere.
- (r) SPCU return line terminates below the suppression pool water level and is sealed from the containment atmosphere.
- (s) The outboard side of these valves is always pressurized with nitrogen gas at a pressure higher than the post-accident peak containment pressure. The nitrogen supply in these lines is required for post-accident mitigating function.
- (t) The outboard side of these valves is always filled with water and pressurized above 110% post-accident peak containment pressure. These lines are kept charged with cooling water for cooling emergency equipment necessary for post-accident mitigation.
- (u) Line will be drained and tested with air.
- $\{\mathbf v\}$ Flammability-control-is-a-closed-loop, safety-grade-system-required-to-be functional-post-accident - Whatever-is-leaking-(if-any)-is-returned-to-the-primary eontainment-In-addition, during-ILRT, these-valves-are-opened-and-the-lines-are subjected-to-Type-A-test.
- $|(v)$ $| \leftarrow | \leftarrow \rangle$ These lines terminate below the drywell sumps water level and are sealed from the containment atmosphere.
	- \leftrightarrow The outboard side of these valves are provided with a water leg. In addition, these valves are subject to ASME leak tests as in (k) above.

(x) *-1k)*

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Not applicable.

10CFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

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t All penetrations will be subject to the Type A test. Those penetrations subject to Type B testing are also tested in the Type A test. * All penetrations excluded from Type B testing are welded penetrations and do not include resilient seals in their design.

Table **6.2-8** Primary Containment Penetration List* (Continued)

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* This table provided in response to Questions 430.49d & e.

t All penetrations will be subject to the Type Atest. Those penetrations subject to Type B testing are also tested in the Type \ddagger

A test.
All penetrations excluded from Type B testing are welded penetrations and do not include resilient seals in their design.

Table **6.2-8** Primary Containment Penetration List* (Continued)

NEDO-33330 Revision 0 *Rev. 0*

***** This table provided in response to Questions 430.49d & e.

t All penetrations will be subject to the Type A test. Those penetrations subject to Type B testing are also tested in the Type

A test. * All penetrations excluded from Type B testing are welded penetrations and do not include resilient seals in their design.

Table **6.2-10** Potential Bypass Leakage Paths* (Continued)

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Table **6.2-10** Potential Bypass Leakage Paths* (Continued)

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Containment Systems 6.2-186

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Table **6.2-10** Potential Bypass Leakage Paths* (Continued)

The following figures are located in Chapter 21:

Figure **6.2-38** Plant Requirements, Group Classification and Containment Isolation Diagram (Sheets **1** - 2)

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Figure **6.2-39** Atmospheric Control System **P&ID** (Sheets **1** - **3)**

Figure-6.2-40-Flammability-Control-System-P&ID-(Sheets-1-2)

1OCFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., **Flammability** Control System, hydrogen recombiners) for plants with inerted containments.

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 $\label{eq:2.1} \frac{1}{\sqrt{2}}\int_{0}^{\infty}\frac{1}{\sqrt{2\pi}}\left(\frac{1}{\sqrt{2}}\right)^{2}d\mu_{\rm{eff}}$

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Figure 6.2-38 Group Classification and Containment Isolation Diagram (Sheet 1 of 2)

{{ {Security-Related Information - Withheld Under **10** CFR 2.390}}}

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-0URE 6.2-40 FLAMMABILITY CONTROL SYSTEM P&ID (Sheet 2 of 2) ABWR **OCD/rTa** 2 **Oa. 0** *:1-124*

6.5.2 Containment Spray Systems

Credit is not taken for any fission product removal provided by the drywell/wetwell spray portions of the RHR System.

6.5.3 Fission Product Control Systems

Fission product control systems are provided in conjunction with other ESF systems to limit the release of radioactive material from the containment to the environment following postulated design basis breaks inside containment and refueling operation accident events. Dose analyses are provided in Chapter 15. The fission product control systems consist of the primary containment and the secondary containment. The following is a discussion of each fission product control system.

6.5.3.1 Primary Containment

10CFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

The primary containment is a cylindrical steel-lined reinforced concrete structure forming a limited leakage boundary for fission products released to the containment atmosphere following a LOCA or other event. The containment is divided into the upper and lower drywells and the suppression chamber (wetwell) by the reinforced concrete diaphragm floor and the reactor vessel pedestal. The diaphragm floor is rigidly attached to the reactor pedestal and the containment wall. A liner is also provided as part of the diaphragm floor to prevent bypass of steam from the upper drywell to the suppression chamber air space during an accident. The primary containment is totally within the secondary containment. A test program confirms the integrity of the leakage boundary. The assumed leak rate from primary containment is 0.5% of the free containment volume per day measured at the containment design pressure.

Containment leak rate testing is described in Subsection 6.2.6. The primary containment walls, liner plate, mechanical penetrations, isolation valves, hatches, and locks function to limit release of radioactive materials, subsequent to postulated accidents, such that the resulting offsite doses are less than the guideline values of 10CFR100.

The structural design details of the primary containment are discussed in Subsection 3.8.2. Primary containment isolation valves are discussed in Subsection 6.2.4. The conditions in the containment during and after the design basis events are given in Section 6.2.

Layouts of the primary containment structure are given in the building arrangement drawings in Section 1.2.

The primary containment atmosphere is inerted with nitrogen by the Atmospheric Control System (ACS). The ACS is described in Subsection 6.2.5. Following-the-design

Design Control Document/Tier 2

10CFR50.44 was revised on October 16, 2003 to no longer require 1hydrogen control hydrogen

|systems (i.e., | basis-LOCA, the Flammability Control System (FCS)-controls the concentration of Flammability oxygen-in-containment. Oxygen-is-generated-by-the-radiolytic-decomposition-of-water-
Control System,

recombiners) for \parallel containment provides a passive barrier to limit the leakage of airborne radioactive plants with inerted \parallel material. Systems required to accomplish ECCS or other ESF functions are not isolated $\vert_{\rm contains}$ See Subsection 6.2.4 for further details of isolation valve closure signals. On appropriate signals, containment isolation valves close as required. The primary

6.5.3.2 Secondary Containment

The secondary containment is provided so that leakage from the primary containment is collected, treated and monitored by the SGTS prior to release to the environment. Refer to Subsection 6.2.3 for a description of the secondary containment boundary and Subsection 6.5.1 for a description of the SGTS.

6.5.4 Not Used

6.5.5 COL License Information

6.5.5.1 SGTS Performance

The COL applicant will perform a SGTS dose/functional damage and drawdown analysis in accordance with Subsections 6.5.1.2.3.2 and 6.5.1.3.1 (5) respectively.

6.5.5.2 SGTS Exceeding **90** Hours of Operation Per Year

The COL applicant is required to demonstrate the SGTS system is capable of performing its intended function in the event of a LOCA, if more than 90 hours of operation per year (excluding test) for either train is anticipated.

6.5.6 References

6.5-1 Thomas E. Murley (NRC) letter to Ricardo Artigas (GE), August 7, 1987, "Advanced Boiling Water Reactor Licensing Review Bases".

Preservice and Inservice Inspection and Testing of Class 2 and 3 Components and Piping
C-52

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Table **6.6-1** Examination Categories and Methods (Continued)

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Table **7.1-1** Comparison of **GESSAR II** and ABWR **I&C** Safety Systems (Continued)

(g) Testability

The HPIN System can be tested at any time by isolating the system from the normal nitrogen source and allowing the nitrogen pressure to decrease. At the proper pressure, valves will open, admitting nitrogen from the high pressure storage bottles; other valves will close, isolating the non-safety-related portions of the system.

(h) Environmental Considerations

The system safety-related equipment is selected in consideration of the normal and accident environments in which it must be operated.

(i) Operational Considerations

The HPIN System, when required for emergency conditions, is initiated automatically with no operator action required.

Running lights, valve positions, indicating lights, and alarms are available in the control room for the operator to accurately assess the HPIN System operation. Common trouble alarms are available in the main control room for the system. Isolation valves have indicating lights for full-open and full-closed positions.

7-3-1-1-14 Flammability-Control-System-Instrumentation-and-Controls

 $-$ (See-Subsection-6.2.5)

7.3.1.2 Design Basis Information

IEEE-279 defines the requirements for design bases. Using the IEEE 279 format, the following nine paragraphs fulfill this requirement for systems and equipment described in this section.

(1) Conditions

The plant conditions which require protective action involving the systems of this section and other sections are examined in Chapter 15.

(2) Variables

The plant variables that are monitored to provide automatic protective actions are discussed in the initiating circuits sections for each system. For additional information, see Chapter 15, where safety analysis parameters for each event are cited.

revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

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- (7) Electrical Power Distribution System (EPDS)
	- (a) The following functions have transfer and control switches located on the Division I remote shutdown panel:
		- (i) 6.9 kV feeder breaker: Unit auxiliary transformer A to M/C E
		- (ii) 6.9 kV feeder breaker: Reserve auxiliary transformer A to $M/C E$
		- (iii) 6.9 kV feeder breaker: Emergency diesel generator A to M/C E
		- (iv) 6.9 kV feeder breaker: Combustion turbine generator to $M/C E$
		- (v) 6.9 kV load breaker: $M/C E$ to $P/C E20$
		- (vi) 480V feeder breaker: TR to P/C E20
	- (b) The following functions have transfer and control switches located on the Division II remote shutdown panel:
		- (i) 6.9 kV feeder breaker: Unit auxiliary transformer B to M/C F
		- (ii) 6.9 kV feeder breaker: Reserve auxiliary transformer A to M/C F
		- (iii) 6.9 kV feeder breaker: Emergency diesel generator B to M/C F
		- (iv) 6.9 kV feeder breaker: Combustion turbine generator to M/C F
		- (v) 6.9 kV load breaker: M/C F to P/C F20
		- (vi) 480V feeder breaker: TR to P/C F20
	- (c) A 6.9 kV M/C (E,F) voltmeter is provided on RSS panels A,B , respectively.
- (8) Flammability-Gontrol-System-(FCS)-
	- The following FCS equipment function has transfer and control switches $+a$ located-on-both-remote-shutdown-panels-as-indicated:
		- (i) Valve-(cooling-water-inlet) B
- (9) Atmospheric Control (AC) System
	- (a) Suppression pool level indication is provided on both RS panels.
- (10) Makeup Water Condensate System (MUWC)
	- (a) Condensate storage pool level indication is provided on RS panel B.
- (11) Suppression Pool Temperature Monitoring System (SPTM)
	- (a) Suppression pool temperature indication is provided on both RS panels.

1OC FR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

The RSS provides instrumentation and controls outside the main control room to allow prompt hot shutdown of the reactor after a scram and to maintain safe conditions during hot shutdown. It also provides capability for subsequent cold shutdown of the reactor through the use of suitable procedures.

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7.4.2.4.2 Specific Regulatory Requirements Conformance

Table 7.1-2 identifies the Remote Shutdown System (RSS) and the associated codes and standards applied in accordance with the Standard Review Plan. The following analysis lists the applicable criteria in order of the listing on the table, and discusses the degree of conformance for each. Any exceptions or clarifications are so noted.

(1) IOCFR50.55a (IEEE-279)

The Remote Shutdown System (RSS) consists of two panels (Division I and Division II) which are located in separate rooms in the Reactor Building.

The RSS provides remote control capability as defined by the following interfaces:

The RSS is designed such that it does not degrade the capability of the interfacing systems. All equipment is qualified as Class **IE,** consistent with the safety-related interfaces.

Separation and isolation is preserved both mechanically and electrically in accordance with IEEE-279 and Regulatory Guide 1.75.

With regard to Paragraph 4.2 of IEEE-279, a single-failure event is assumed to have occurred to cause the evacuation of the control room. The RSS is not designed to

temperature variable is considered a Type A variable since no credit is taken for automatic initiation in the safety analysis.

(j) Drywell Atmosphere Temperature

Surveillance monitoring of the temperatures in the drywell is provided by multiple temperature sensors distributed throughout the drywell to detect local area "hot-spots" and to monitor the operability of the drywell cooling system. With this drywell air temperature monitoring system supplied by multiple temperature sensors throughout the drywell, the Regulatory Guide 1.97 requirements for monitoring of drywell air temperature are met and provides the ability to determine drywell bulk average temperature.

(k) Drywell/Wetwell Hydrogen/Oxygen Concentration

The Containment Atmospheric Monitoring System (CAMS) consists of two independent and redundant drywell/containment oxygen and hydrogen concentration monitoring channels. Emergency response actions regarding these variables are consistently directed toward minizing the magnitude of these parameters (i.e., there are no safety actions which must be taken to increase the hydrogen/oxygen levels if they are low_r). Consequently, the two channel CAMS design provides adequate PAM indication, since, in the event that the two channels of information disagree, the operator can determine a correct and safe action based upon the higher of the two (in-range) indications.

(1) Wetwell Atmosphere Air Temperature

Surveillance monitoring of temperatures in the wetwell is provided by multiple temperature sensors dispersed throughout the wetwell, therefore, the required indication of bulk average wetwell atmosphere temperature is satisfied.

(m) Standby Liquid Control System Flow

No flow indication is provided for the ABWR design. The positive displacement SLCS pumps are designed for constant flow. Any flow blockage or line break would be indicated by abnormal system pressure (high or low as compared to RCS pressure) following SLCS initiation. Changing neutron flux, SLCS pressure and SLCS tank level are substituted for SLCS flow and are considered adequate to verify proper system function. One channel of SLCS discharge pressure is provided in addition to the monitoring of neutron flux.

(n) Suppression Pool/Wetwell Water Level

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!Minimizing drywell
containment
oxygen and
hydrogen
concentrations are
accomplished
using manual
operator actions
through the use of
containment
venting and
purging or the use
of containment<br>spray.
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Table **7.5-2** ABWR PAM Variable List (Continued)

Table **7.5-6** Design Basis Accidents

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* See Table 7.5-9 for Definition of Symbols.

t Analysis indicates not plausible.

Table **7.5-9** Definition of Symbols for Tables 7.5-4 Through **7.5-8**

Table **7A-1** List of Equipment Interface with Essential **MUX** Signals (Continued)

Table **8.3-1** *DIG* Load Table-LOCA + LOPP

Table **8.3-3** Notes for Tables **8.3-1** and **8.3-2**

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- (1) -: shows that the load is not connected to the switchgear of this division.
	- X : shows that the load is not counted for **D/G** continuous output calculation by the reasons shown on other notes.
- (2) "Motor operated valves" are operated only 30-60 seconds. Therefore they are not counted for the DG continuous output calculation.
- (3) Div. IV battery charger is fed from Div. II motor control center.
- (4) Load description acronyms are interpreted as follows:

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(5) Redundant units, one unit of a division operates and one unit is in standby in case the operating unit shuts down. Total connected load is shown on the table, but operating loads are half these amounts.

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ABWR

Table 9.2-4b Reactor Building Cooling Water Division B

* Heat in GJ/h; flow in m³/h, sums may not be equal due to rounding. **Rm. 425 / 436**

t) HECW refrigerator, room coolers (RHR, HPCF, SGTS, FCS, CAMS), CAMS cooler, HPCF and RHR motor and mechanical seal coolers

t The heat transferred from the CUW heat exchanger at the start of cooldown is appreciable, but during the critical last part of a cooldown, the heat removed is very little because the temperature difference between the reactor water and the RCW System is small. Sometimes, the operators may remove the CUW heat exchangers from service during cooldown. Thus, the heat removed varies from about that during normal operation at the start of cooldown to very little at the end of cooldown.

f Includes FPC room cooler.

** Drywell (B) and RIP coolers.

Reactor Building sampling coolers; LCW sump coolers (in drywell and reactor building), RIP MG sets and CUW pump coolers. *tt* **^I**

10CFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

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Water Systems

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^{*} Heat in GJ/h; flow in m³/h, sums may not be equal due to rounding.

t HECW refrigerator, room coolers, motor coolers, and mechanical seal coolers for RHR and HPCF, **FGS** room cooler, SGTS room cooler.

t Instrument and service air coolers, CRD pump oil cooler, radwaste components, HSCR condenser, and turbine building sampling coolers.

10CFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

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9.4.5.2 R/B Safety-Related Equipment **HVAC** System

9.4.5.2.1 Design Bases

9.4.5.2.1.1 Safety Design Bases

The R/B Safety-Related Equipment HVAC System is designed to provide a controlled temperature environment to ensure the continued operation of safety-related equipment in harsh environment under accident conditions. The rooms cooled by the Safety-Related Equipment HVAC System are maintained at negative pressure relative to atmosphere by the secondary containment HVAC System during the normal operating mode, and by standby gas treatment system in isolation mode.

The systems and components are Seismic Category I and are located in the Reactor Building, separate and independent compartments of a Seismic Category I structure that is tornado-missile, and flood protected.

Fire protection has been evaluated and is described in Subsection 9.5.1.

9.4.5.2.1.2 Power Generation Design Bases

The system is designed to provide an environment with controlled temperature and humidity to ensure both the comfort and safety of plant personnel and the integrity of Reactor Building equipment. The systems are designed to facilitate periodic inspection of the principal system components.

9.4.5.2.2 System Description

The R/B Safety-Related Equipment HVAC System consists of 12 safety-related fan coil units (FCU) of division A, B, or C. Each FCU has the responsibility to cool one safetyrelated equipment room in the secondary containment. The safety-related equipment HVAC (fan coil units) system P&ID is shown in Figure 9.4-3. Space temperatures are maintained less than 40'C normally and less than 66°C during pump operation:

- (1) RHR(A) pump room
- (2) RHR(B) pump room
- (3) RHR(C) pump room
- (4) HPCF(B) pump room
- (5) HPCF(C) pump room
- (6) RCIC pump room
- (7) FGS (B) -room Rm.

1OCFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

Air Conditioning, Heating, c'rrng-and *Ventilating Systems*

- (9) SGTS(B) room
- (10) SGTS (C) room
- (11) CAMS (A) room
- (12) CAMS(B) room

9.4.5.2.2.1 RHR, HPCF and RCIC Pump Room **HVAC** Systems

The FCU's automatically start when RHR pumps, HPCF pumps, and RCIC turbine are started. These rooms are normally cooled by the Secondary Containment HVAC System. The fan coil units are open ended and recirculate cooling air within the space served. Space heat is removed by cooling water passing through the coil section. Divisional Reactor Building Cooling Water (RCW) is used as the cooling medium. The units are fed from the same divisional power as that for the equipment being served. D_{rain} pan discharge (condensate) is routed to a floor drain located within the room. Pm. 425 / 436

9.4.5.2.2.2 **FCS** Room **HVAC** System Cooling of Rm. 425 **/** 436 is automatically initiated upon $\overline{10CFR50.44 \text{ was}}$ \leftarrow \leftarrow receipt of a secondary containment isolation signal.

blants with inerted $\frac{1}{2}$ within the room. ;ontainments.

10C1 1N30.44 was
revised on October **Cooling of the FGS** rooms are automatically initiated upon receipt or a secondary 16, 2003 to no containment isolation signal or a manual FCS-start-signal.
16, 2003 to no film 425 / 436

onger require These rooms are cooled by the Secondary Containment HVAC System during normal $\frac{1}{2}$ conditions. The units are open ended and recirculate cooling air within the space systems (i.e., served. Space heat is removed by cooling water passing through the coil section. Flammability Divisional RCW is used as the cooling medium. The units are fed from the same Dontrol System, divisional power as that for the **FGS** being served. Humidity is not specifically -ydrogen and maintained at a set range, but is automatically determined by the surface temperature ecombiners) for of the cooling coil. Drain pan discharge (condensate) is routed to a floor drain located

9.4.5.2.2.3 **SGTS** and **CAMS HVAC** Systems

Cooling of the SGTS and CAMS rooms are automatically initiated upon receipt of a secondary containment isolation signal.

These rooms are cooled by the Secondary Containment HIVAC System during normal conditions. The units are open ended and recirculate cooling air within the space served. Space heat is removed by cooling water passing through the coil section. Divisional RCW is used as the cooling medium. The units are fed from the same divisional power as that for the equipment being served. Drain pan discharge (condensate) is routed to a floor drain located within the room.

Table 9.4-4d Not Used

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Table 9.4-4e **HVAC** System Component Descriptions **-** Safety-Related Fan Coil Units (Response to Question 430.243)

Table of Contents (Continued)

9A.4.1.3.38 Division 4 Remote Multiplexing Room

(R m N o. 381) **...** 9A .4-163 9A.4.1.3.39 Reactor Water Sampling Rack Room (Rm No. 380) **.....** 9A.4-165 9A.4.1.3.40 FPC FD Rack Room (Rm No. 346) **.................................** 9A.4-167 9A.4.1.4 Building - Reactor Bldg **El** 12300mm **.................................** 9A.4-169 9A.4.1.4.1 Upper Drywell (Rm No. 491) **...** 9A.4-169 9A.4.1.4.2 North Controlled Entry and Corridor A (Rm No. 410) .9A.4-171 9A.4.1.4.3 **E** and I Penetration Room (Division 1) (Rm No. 411)...9A.4-173 9A.4.1.4.4 Diesel Generator A Room (Rm No. 412) **........................** 9A.4-174 9A.4.1.4.5 Clean Area Access A/C (Rm No. 413) **.............................** 9A.4-177 9A.4.1.4.6 ECCS Valve A Room (Rm No. 414) **.................................** 9A.4-179 9A.4.1.4.7 ECCS Valve C Room (Rm No. 431) **.................................** 9A.4-181 9A.4.1.4.8 Corridor C (Equipment Entry) (Rm No. 430) **................** 9A.4-182 9A.4.1.4.9 E and I Penetration Room (Div 3) (Rm No. 433) **..........** 9A.4-185 9A.4.1.4.10 Diesel Generator C Room (Rm No. 432) **......................** 9A.4-186 $9A41411$ -Flammability-Control-System Room (Div 3)
Rm. (Rm No. 436) "R m . (R m N o. 436) **...** 9A .4-189 *9p* 2 Corridor B (Rm No. 420) **...** 9A.4-190 9A.4.1.4.13 E and I Penetration Room (Rm No. 424) **......................** 9A.4-192 9A.4.1.4.14 Not Used 9A.4-194 9A.4.1.4.15 Diesel Generator B Room (Rm No. 423) **.......................** 9A.4-194 9A.4.1.4.16 ECCS Valve B Room (Rm No. 421) **................................** 9A.4-196 9A.4.1.4.17 Clean Area Access B/D (Rm No. 426) **...........................** 9A.4-198 9A.4.1.4.18 E and I Penetration Room (Div 4) (Rm No. 444) **.........** 9A.4-199 9A.4.1.4.19 South Controlled Entry and Corridor (Rm No. 445) ... 9A.4-201 9A.4.1.4.20 CUW Valve Room (Rm No. 443) **....................................** 9A.4-203 9A .4.1.4.21 N ot U sed **...** 9A .4-205 9A.4.1.4.22 PASS Rack Room (Rm No. 441) **.....................................** 9A.4-205 9A.4.1.4.23 Filter/Demineralizer Access Room (Rm No. 447) **........** 9A.4-206 9A.4.1.4.24 Filter/Demineralizer Pre Coat Room (Rm No. 441) 9A.4-208 9A .4.1.4.25 N ot U sed **...** 9A .4-210 9A.4.1.4.26 Steam Tunnel (Rm No. 440) **..** 9A.4-210 9A.4.1.4.27-Piarmmnbiliy- on-ru-fSys-errr Room (Rm No. 425) **......** 9A.4-211 9A.4.1.4.28 E and I Electrical Penetration Room (Rm No. 435) **.....** 9A.4-213 9A.4.1.5 Building - Reactor Bldg **El** 18100mm **................................** 9A.4-215 9A.4.1.5.1 Corridor A (Rm No. 510) **...** 9A.4-215 9A.4.1.5.2 D/G Fan and 1HVAC Room (Rm No. 514) 9A.4-217 9A.4.1.5.3 Exhaust DuctA (Rm No. 515) **..** 9A.4-218 9A.4.1.5.4 **DG** Control Panel A (Rm No. 516) 9A.4-220 9A.4.1.5.5 Steam Tunnel Entry Room (Rm No. 512) **.......................** 9A.4-222 9A.4.1.5.6 Corridor C (Rm No. 530) **...** 9A.4-224 9A.4.1.5.7 U/D Equipment Hatch (Rm No. 531) **............................** 9A.4-226 9A.4.1.5.8 **DG** Control Panel C Room (Rm No. 536) **......................** 9A.4-227 9A.4.1.5.9 D/G Fan and HVAC Room (Rm No. 533) **......................** 9A.4-229 9A.4.1.5.10 Exhaust Duct C Room (Rm No. 534) **...........................** 9A.4-231 9A .4.1.5.11 N ot U sed **...** 9A .4-232 9A.4.1.5.12 Corridor B (Rm No. 520) **...** 9A.4-232

1OCFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

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with elevator and stair tower 3, the wall common with RIP Panel Room (320), the exterior wall, the floor and the ceiling are of 3 h fire-resistive concrete construction. Two 3 h fire-resistive double doors provide access and egress from the emergency electrical room C (Rm 337) and RIP Panel room (Rm 320). Two-piping-spaces are entered-to-this-room-at-elevation-10300-mm to-facilitate-the-FCS piping-to-the-next-elevation. The walls of these piping spaces are fire barrier of 3 h fire resistive concrete construction.

(5) Combustibles Present:

- (6) Detection Provided-Class A supervised POC in the room and manual alarm pull station at Col. 6.9-E.2 and 1.9-F.5.
- (7) Suppression Available:

(8) Fire Protection Design Criteria Employed:

 $10CFF$ *revise* $16, 20$ longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

(9) Consequences of Fire-The postulated fire assumes the loss of the function. The provisions for core cooling systems backup are defined in Subsection 9A.2.5.

Smoke from a fire will be removed by the normal HVAC System operating in its smoke removal mode.

- (10) Consequences of Fire Suppression-Suppression extinguishes the fire. Refer to Section 3.4, "Water Level (Flood) Design", for the drain system.
- (11) Design Criteria Used for Protection Against Inadvertent Operation, Careless Operation or Rupture of the Suppression System:
	- (a) Location of the manual suppression system external to the room
	- (b) Provision of raised supports for the equipment
	- (c) Refer to Section 3.4, "Water Level (Flood) Design", for the drain system.
	- (d) ANSI B31.1 standpipe (rupture unlikely)
- (12) Fire Containment or Inhibiting Methods Employed:
	- (a) The functions are located in a separate fire-resistive enclosure.
	- (b) The means of fire detection, suppression and alarming are provided and accessible.

as fire barriers and are of 3 h fire-resistive concrete construction. The floor is also a fire barrier to limit the size of the fire areas below and to protect the

(13) Remarks-The room contains cable in conduit only.

9A.4.1.4.8 Corridor **C** (Equipment Entry) (Rm No. 430)

9A.4-182 Analysis
1OCFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

lower regions of the building, which contains the majority of the ESF equipment. The walls are concrete and are not rated as they are internal to fire area F4301. A section of the ceiling common to fire areas F4300, F1300 and F3300 above is of 3 h fire-resistive concrete construction. The remainder of the ceiling is not fire rated as it is internal to fire area F4310. Access to the corridor is provided from corridors A and B via 3 h fire-resistive doors. The corridor provides direct access to the electrical and instrumentation penetration room (Rm 433) through a nonrated door and valve room \overline{Rm} . (C) (Rm 431) and the Flammability-Gontrol-System $|436|$ Rm 436) through

3 h fire-resistive doors. There is an open hatch to the floors above. A large steel non-fire-rated door provides access to the reactor building for moving in fuel and other large loads.

(5) Combustibles Present:

- (6) Detection Provided-Class A supervised POC in the room and manual alarm pull stations at 5.9-F.2 and 2.1-F.1.
- (7) Suppression Available:

(8) Fire Protection Design Criteria Employed:

- (b) The means of fire detection, suppression and alarming are provided and accessible.
- (13) Remarks--Although the areas surrounding the adjacent diesel generator room are of the same safety division, the diesel generator room is designated as a separate fire area due to the relatively large amounts of lubricating and fuel oil present. \overline{Rm} .

9A.4.1.4.11 Flammability-Control-Sy Room (Div. 3) (Rm No. 436)

- (1) Fire Area-F4320
- (2) Equipment: See Table 9A.6-2

- (3) Radioactive Material Present-None that can be released as a result of fire.
- (4) Qualifications of Fire Barriers-The floor and interior and exterior walls are fire barriers and are of 3 h fire-resistive concrete construction. The ceiling is formed by the bottom of the spent fuel storage pool (F4301) and is a 3 h fire barrier. Personnel access is provided via a 3 h fire-resistive door from corridor C (Rm 430).
- (5) Combustibles Present:

- (6) Detection Provided-Class A supervised POC in the room and manual alarm pull station at Col. 5.9-F.2 and 2.1-F.1.
- (7) Suppression Available:

10CFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

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- **1** OCFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.
- (4) Qualifications of Fire Barriers—The walls common with the Flat $\frac{425}{1}$ ity Gontrol-System Room (Rm 425), the elevator and stair well walls, the Diesel Generator B Room (Rm 423) and the ECCS Valve B Room (Rm 421) serve as fire barriers and are of 3 h fire-resistive concrete construction. The floor is also a fire barrier to limit the size of the fire areas below and to protect the lower regions of the building, which contains the majority of the ESF equipment. The walls common with the E and I Penetration Room (Rm 422) and the ceiling are fire-resistive concrete but are nonrated as they are internal to fire area F4201. Access to the corridor is provided from corridor D (Rm 445), corridor C (Rm 430) and stairs and elevator No.3. A 3 h fire damper is installed in the HVAC duct (located next to the elevator) where it passes through the fire barrier floor to the division 2 areas on the level below. This fire barrier divides the division 2 area of the building to limit the magnitude of possible damage due to a single fire.
	- (5) Combustibles Present:

- (6) Detection Provided-Class A supervised POC in the room and manual alarm pull stations at 5.9-F.2 and 2.1-F.1.
- (7) Suppression Available:

- (8) Fire Protection Design Criteria Employed:
	- (a) The function is located in a separate fire resistive enclosure.
	- (b) Fire detection and suppression capability is provided and accessible.
	- (c) Fire stops are provided for cable tray and piping penetrations through rated fire barriers.
- (9) Consequences of Fire-The postulated fire assumes the loss of the function. The provisions for core cooling systems backup are defined in Subsection 9A.2.5. Access is provided to the corridor from either end.

10CFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., **Flammability** Control System, hydrogen recombiners) for plants with inerted

containments.

- (b) The means of fire detection, suppression and alarming are provided and accessible.
- (13) Remarks-None.

9A.4.1.4.14 Not Used

9A.4.1.4.15 Diesel Generator B Room (Rm No. 423)

- **(1)** Fire Area-F4200
- (2) Equipment: See Table 9A.6-2

Safety-Related Provides Core Cooling Yes, D2 Yes, D2

- (3) Radioactive Material Present-None.
- (4) Qualifications of Fire Barriers—The building exter $|425|$ ls, the walls common with Corridor B (Rm 420), the wall common with FGS-room (Rm 425), the wall common with stair wells (Rms 193 and 329), and the floor are of 3 h fire resistive concrete construction. The interior partition walls, and ceiling are not fire rated as they are internal to fire F4200. The ceiling of the room is not a fire barrier as the fan room is located directly above this diesel generator room. The exterior wall of the room has a removable section for removal of equipment from the diesel generator room. Access to this room is provided from the Clean Area Access C/D (Rm 426) through a 3 h fire-rated door and through the removable section of the external wall.

 Rm

(5) Combustibles Present:

(6) Detection Provided-Class A supervised rate-compensated thermal detectors and infrared detectors. The detection system is a cross-zoned system requiring two detectors, one of each in each zone. Each detector initiates a local alarm upon sensing fire. The second detector alarm provides fire confirmation, which opens the preaction valve and initiates the system alarm in the control room. There is a manual pull stations at Col. 1.4-C.8.

- (a) The function is located in a separate fire resistive enclosure.
- (b) Fire detection and suppression capability is provided and accessible.
- (c) Fire stops are provided for cable tray and piping penetrations through rated fire barriers.
- (9) Consequences of Fire-The postulated fire assumes the loss of the function. The valves are spatially separated and are designed to fail closed on loss of actuation power. The provisions for core cooling systems backup are discussed in Subsection 9A.2.5.

Smoke from a fire will be removed by the normal HVAC System operating in its smoke removal mode.

- (10) Consequences of Fire Suppression-Suppression extinguishes the fire. Refer to Section 3.4, "Water Level (Flood) Design", for the drain system.
- (11) Design Criteria Used for Protection Against Inadvertent Operation, Careless Operation or Rupture of the Suppression System.
- (a) Location of the manual suppression system in rooms external to the 10CFR50.44 was rooms containing safety-related equipment
- **16,** 2003 to no (b) Provision of raised supports for the equipment
- longer require (c) Refer to Section 3.4, "Water Level (Flood) Design", for the drain system.
- systems $(i.e.,$ (d) ANSI B31.1 standpipe (rupture unlikely)
- Flammability (12) Fire Containment or Inhibiting Methods Employed:
- hydrogen (a) The functions are located in a separate fire-resistive enclosure.
- plants with inerted \vert (b) The means of fire detection, suppression and alarming are provided and

(13) Remarks-None $\overline{\mathsf{Rm}}$

9A.4.1.4.27 Flammability-Control-S $\frac{|425|}{\sqrt{25}}$ Room (Rm No 425)

- (1) Fire Area-F4230
- (2) Equipment: See Table 9A.6-2

Safety-Related

Yes, D2

Provides Core Cooling

revised on October hydrogen control recombiners) for |containments. | accessible.

Figure 9A.4-4 Reactor Building Fire Protection at Elevation **12300** mm { { {Security-Related Information - Withheld Under 10 CFR 2.390} } }

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Figure 9A.4-9 Reactor Building Fire Protection Section **A-A**

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Nondivisional Equipment

Boron Storage Tank

Storage Tank Heating elements

Power Cabling for Storage Tank Heaters

The cabling is routed in separate conduit or trays for each division, separated from each other, to meet IEEE-384. Conduit will be embedded in concrete where feasible.

The electric drive motor and cabling for the redundant pumps are located more than 1.52 m apart. The injection valves and cabling are located more than 0.91 m apart centerline to centerline.

The control cables for Division **I** and 2 equipment are in separate conduit and separate from the power cables. The Division 1 power and control cabling is routed out of the Division 2 area to the Division **I** area by conduit embedded in the floor and wails.

Postulated fire damage to the electrical equipment in the SLC area could not inadvertently result in injection of boron because this can only be done by activation of a switch on the control room panel. Fire could damage the power cabling to the pump suction valves or to the pump motors preventing opening of valves or start of pump motors on command from the control room. However, the SLC equipment is not required for safe shutdown of the reactor, since it is redundant to the RPS.

9A-5-5-9-Flammability-Control-System

10CFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

The-flammability-control-system-equipment-is-located-in-a-large-enclosed-area-at-grade
level-at-approximately-180-degrees-azimuth. The-rooms-have-a-fire-barrier-floor-and-is eompletely-surrounded-by-fire-barrier-walls-and-doors. There are large access-doors-to the-outside-at-the-centerline-of-the-room.

The-FCS-is-made-up-of-two-independent-redundant-divisions-(Divisions-2-and-3), and each-division-is-located-in-the-fire-area-division-2-and-3-respectively. Each-division-has two suction-isolation valves-(inboard-and-outboard) and-two-return-isolation valves-
(inboard-and-outboard). The inboard-isolation-valves-are-motor-operated-(MO)-valves, and-the-outboard-isolation-valves are-fail-close-(FC)-air-operated-(AO)-solenoid-valves (two-solenoids-per-valve). They are powered-from-division-1-and 4. Fire in-either-division may cause the inboard-valves (Div. 2 or 3) to fail to operate, but the outboard isolation valves-are-still-capable-to-isolate-because-they-are-powered-from-different-divisions-(Div-1-and-4).-Loss-of-a-complete-division-is-acceptable-because-FCS-is-made-up-of-two independent-redundant-divisions-mounted-in-two-separated-fire-areas-

10CFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

Table **9A.6-2** Fire Hazard Analysis Equipment Database Sorted **by** Room **-** Reactor Building (Continued)

Fire Hazard Analysis Database

10CFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

Table **9A.6-2** Fire Hazard Analysis

Fire Hazard Analysis Database 9A. 6-25

10CFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments. **I**

Table **9A.6-2** Fire Hazard Analysis **Equipment Database Sorted by Room**

Fire Hazard Analysis Database 9A.6-60

10CFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

Table **9A.6-2** Fire Hazard Analysis Equipment Database Sorted by **Room**

10CFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

Table **9A.6-2** Fire Hazard Analysis **Equipment Database Sorted by Room - Reactor Building (Continued)**

10CFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments. **I**

Table **9A.6-2** Fire Hazard Analysis Equipment Database Sorted **by** Room **-** Reactor Building (Continued)

9A. 6-63 Fire Hazard Analysis Database

10CFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

Table **9A.6-2** Fire Hazard Analysis

10CFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

Table **9A.6-2** Fire Hazard Analysis

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Figure 12.3-5 Reactor Building Radiation Zone Map for Full Power and Shutdown Operation at Elevation 12300 mm

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 $\label{eq:2.1} \frac{1}{\sqrt{2}}\sum_{i=1}^n\frac{1}{\sqrt{2}}\sum_{i=1}^n\frac{1}{\sqrt{2}}\sum_{i=1}^n\frac{1}{\sqrt{2}}\sum_{i=1}^n\frac{1}{\sqrt{2}}\sum_{i=1}^n\frac{1}{\sqrt{2}}\sum_{i=1}^n\frac{1}{\sqrt{2}}\sum_{i=1}^n\frac{1}{\sqrt{2}}\sum_{i=1}^n\frac{1}{\sqrt{2}}\sum_{i=1}^n\frac{1}{\sqrt{2}}\sum_{i=1}^n\frac{1}{\sqrt{2}}\sum_{i=1}^n\frac$

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Figure 12.3-10 Reactor Building Radiation Zone Map for Full Power and Shutdown Operation, Section A-A

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Figure **12.3-16** Reactor Building Radiation Zone Map Post **LOCA** at Elevation **12300** mm

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Figure **12.3-21** Reactor Building Radiation Zone Map Post **LOCA,** Section **A-A**

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 $\ddot{}$

- DC System
- **"** Neutron Monitoring
	- Source Range
	- Intermediate Range
	- Power Range
	- TIP System
- **"** Reactor Protection
- Rod Worth Minimizer
- Hydrogen-Recombiners

Procedures For Off-Normal Or Alarm Conditions.

Prepare all procedures for off-normal or alarm conditions that require operator action in the MCR and RSS. These correspond to the number of alarm annunciators. Each annunciator important to safety should have its own written procedure, which should normally contain (a) the meaning of the annunciator, (b) the source of the signal, (c) the immediate action that is to occur automatically, (d) the immediate operator action and (e) the long-range actions. If more than one annunciator applies to a given procedure, repetition of the procedure may not be required if the applicable annunciators are listed at the beginning of the procedure.

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General Plant Operating Procedures.

As discussed in Section A5 of ANSI/ANS-3.2, procedures shall be prepared for the integrated operations of the plant. Typical general plant procedures are listed below:

- **"** Cold Shutdown to Hot Standby
- **"** Hot Standby to Minimum Load (nuclear startup)
- Recovery from Reactor Trip
- **"** Operation at Hot Standby
- **"** Turbine Startup and Synchronization of Generator
- **"** Changing Load and Load Follow (if applicable)
- **"** Power Operation and Process Monitoring
- Power Operation with Less than Full Reactor Coolant Flow

10CFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

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operational for verifying the leak detection and isolation functions as indicated in the parenthesis:

- (a) Neutron Monitoring System (ATIP isolation)
- (b) Containment System (drywell coolant leakage)
- (c) Standby Gas Treatment System (system initiation)

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- (d) Reactor Protection System (isolation bypass)
- (e) Standby Liquid Control System (system initiation)
- (f) Nuclear Boiler System (MS1V, MSL drain valves)
- (g) RHR System (shutdown cooling suction isolation)
- (h) CUW System (containment isolation valve)
- (i) RCIC System (system isolation)
- (j) SSLC (LDS logic processing)
- (k) Other auxiliary systems (e.g., PRM, RD, RCW, HNCW, HVAC, ACS, **FCGS** SPCU, etc.) associated with the LDS functions
- (3) General Test Methods and Acceptance Criteria

Since the LDS is comprised mostly of logic, the checks of valve response and timing and the testing of sensors will be performed as part of, or in conjunction with, the various systems with which they are associated.

Performance shall be observed and recorded during a series of individual component and integrated system tests. These tests shall demonstrate that the LDS operates properly as specified in Subsection 7.3.1.1.2 and applicable LDS design specification through the following testing:

- (a) Correct implementation and operation of the LDS software-based controls and instrumentation. This test shall check the system behavior against the functional, performance and interface requirements as specified by the appropriate design documents and the Hardware/Software System Specification (HSSS).
- (b) Verification of various indicators, annunciators, and alarms used to monitor system operation and status for correct functions.
- (c) Proper operation of leakoff and drainage measurement functions such as those associated with the reactor vessel head flange, drywell cooler condensate, and various primary system valves.

1OCFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

14.2.12.1.18 Remote Shutdown System Preoperational Test

(1) Purpose

Verify the feasibility and operability of intended remote shutdown functions from the Remote Shutdown System (RSS) panel and other local and remote locations outside the main control room which will be utilized during the remote shutdown scenario.

(2) Prerequisites

The construction tests have been successfully completed, and the SCG has reviewed the test procedure and approved the initiation of testing. Communication shall be established between the RSS panel, main control room, and each system associated with the RSS. Additionally, the 480 VAC and 6.9 kVAC electrical power system shall be in operation and available and 125 VAC/125 VDC control power shall be supplied to the remote shutdown panel. The applicable portions of the RHR, HPCF, RCW, RSW, NBS, ACS,-FCS and MUWC shall be available, as needed, to support the specified testing.

(3) General Test Methods and Acceptance Criteria

The Remote Shutdown System (RSS) consists of the control and instrumentation available at the dedicated remote shutdown panel(s) and other local and remote locations intended to be used during the remote shutdown scenario.

Much of the specified testing can be accomplished in conjunction with, or as part of, the individual system and component preoperational testing. However, the successful results of such testing shall be documented as part of this test, as applicable. Performance shall be observed and recorded during a series of individual component and integrated system tests. This test shall demonstrate that the RSS operates properly as specified in Subsection 7.4.1.4 and applicable RSS design specification through the following testing:

- (a) Proper functioning of the system controls and instrumentation associated with the RSS after transfer of control to the RSS panel.
- (b) Proper operation of remote shutdown system pumps and valves including establishment of system flow paths using RSS control.
- (c) Proper functioning of RSS transfer switches including verification of proper override of main control room functions.

10CFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

- (b) The BOP scope of piping systems are as follows:
	- (i) Main steam piping downstream of the MSIV outside containment
	- (ii) Feedwater piping outside containment downstream of the isolation check valves
	- (iii) RPV head vent piping
	- (iv) CUW suction and discharge piping, including the head spray line
	- (v) RHR suction and discharge and injection piping in shutdown cooling mode and LPFL mode
	- (vi) RCIC turbine steam supply and exhaust piping
	- (vii) RCIC pump suction and discharge piping
	- (viii) SLC system piping (pump suction/discharge)
	- (ix) RSW suction and discharge piping
	- (x) RCW suction and discharge piping
	- (xi) HPCF suction and injection piping
	- (xii) Diesel generator fuel, cooling, intake and exhaust piping
	- (xiii) FCS hydrogen-recombiner-piping
	- (xiv) CRD system piping (pump suction/discharge)

Thermal expansion testing during the preoperational phase will consist of displacement measurements on the NSSS portion of piping during the RRS/RPV internal hot functional test (Subsection 14.2.12.1.2) and visual inspections at ambient temperature on the NSSS and BOP portions of piping. The testing will be in conformance with ANSI/ASME-OM7 as discussed in Subsection 3.9.2.1.2, and will consist of a combination of visual inspections and local and remote displacement measurements. This testing, as well as that performed during the power ascension phase per Subsection 14.2.12.2.10, includes the inspection and testing of RCPB component supports as described in Subsection 5.4.14.4. Visual inspections are performed to identify actual or potential constraints to free thermal growth prior to or between tests. Displacement measurements will be made utilizing specially installed instrumentations and also using the position of supports such as snubbers. Results of the thermal expansion testing are acceptable when all systems move as predicted and there are no observed restraints to free thermal growth or when additional analysis shows that any unexpected results will not produce unacceptable stress values.

Vibration testing will be performed on system components and piping during preoperational function and flow testing. This testing will be in accordance with ANSI/ASME-OM3 as discussed in Subsection 3.9.2.1.1 and will include visual observation and local and remote monitoring in critical steady-state

1OCFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

- (d) Proper operating conditions and performance capability during the following system operational tests:
	- (i) Placing a standby polisher unit into service
	- (ii) Transferring the resin inventory of any polisher vessel into the resin receiver tank
	- (iii) Removing operating filter from service, backwashing and restoring to service
	- (iv) Transferring the resin storage tank resins to any polisher vessel
	- (v) Transferring resin from resin receiver tank to the radwaste system
	- (vi) Operating the system at full condensate flow with four filters and five polisher vessels
- (e) Proper operation of interlocks and equipment protective devices
- (f) Proper operation of permissive, prohibit, and bypass functions
- (g) Ability to perform online exchange of standby and spent filter units and polisher vessels
- (h) Proper operation of filter and polisher support facilities such as those used for regeneration of resins or for handling of wastes
- (i) Proper operation of the system flow bypass feature through manually operating the system flow bypass valve from the main control room

14.2.12.1.55 Reactor Water Chemistry Control Systems Preoperational Test

10CFR50.44 was revised on October **16,** 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

(1) Purpose

To verify proper operation of the various chemical addition systems designed for actively controlling the reactor water chemistry, including the oxygen injection system, the zinc injection passivation system, the iron ion injection system, and the Hydrogen Water Chemistry System (HWCS).

(2) Prerequisites

The construction tests have been successfully completed, and the SCG has reviewed the test procedure(s) and approved the initiation of testing. The **FCS-** Offgas System, appropriate electrical power, and other required interfacing systems shall be available, as needed, to support the specified testing. The appropriate vendor precautions shall be followed with regards to the operation of the affected systems and components and for the actual reactor water chemistry given the existing reactor operating state.

mode of operation. Generator hydrogen purity and leakage rate shall meet the appropriate design requirements.

(e) Proper operation of the stator cooling system to provide adequate stator cooling water flow at prescribed flow rate and maintain inlet temperature and conductivity control.

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- (f) Correct function of the generator runback circuits in response to simulated high stator cooling water outlet temperature and low stator cooling water pressure signals.
- (g) Proper operation while powered from primary and any alternate sources, including transfers, and in degraded modes for which the system, subsystem or component is expected to remain operational.
- (h) Acceptable generator clearance and vibration levels, during both transient and steady-state operation. This test can be performed during the startup test stage in conjunction with turbine testing.
- (i) Acceptable differential pressure between air side and hydrogen side of generator seal oil system.

14-2-12-1-72-Flammability-Control-System-Preoperational-Test

 (1) Purpose

To-verify-the-ability-of-the-Flammability-Control-System-(FCS)-to-recombine
hydrogen-and-oxygen-and-therefore-maintain-the-specified-inert-atmosphere in-the-primary-containment-during-long-term-post-accident-conditions.

(2) Prerequisites

The-construction-tests,-including-the-pressure-proof-test,-have-been. suecessfully-completed, and-the-SGG-has-reviewed-the-test-procedure-and approved-the-initiation-of-testing. All-system-instrumentation-shall-be-in aecordance with the FCS-instrument-data-sheets-and-calibrated-per instrument supplier's instructions. All services, including water, electricity and
communications, shall be available and performing at their rated design-levels (flow, voltage, pressure, etc.). The wetwell-and-drywell-airspace-regions-of-the primary containment shall-be-intact, and all other-required interfaces shall-be available, as-needed, to-support-the-specified-testing.

(3) General Test Methods and Acceptance Criteria

Performance-shall-be-observed-and-recorded-during-a-series-of-individual
component-and-integrated-system-tests. This-test-shall-demonstrate-that-the

10CFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

FCS-operates-properly-as-specified-in-Subsection-6.2.5 and applicable FCS design-specifications-through-the-following-testing.

- (a) Proper-operation-of-instrumentation-and-system-controls-in-all combinations of logic
- (b) Verification of various component alarms including alarm actuation and reset, alarm-set-value, alarm-indication and operating logic
- $\left(e\right)$ Proper-operation-of-all-motor-operated-and-air-operated-valves, i neluding-stroking-using-valve-opening/elosing-switches-at-the-control room, verification of indicator lamp, timing and isolation function, if a-pplieabie
- {d-) r--oper-system-ope-r-a-t-i-ng-eoi+d-iti&+s-(i-.e.,t-he-systtemr-sh-alI-be-opera-ted normally-without-any-abnormalities, vibration, or-leakage-in eomponents, valves, and-piping-within-the-FCS) for the following-test eases-while-the-FGS-is-in-aecident-operating-mode-and-regular-testing mode-of-operation-as-defined-in-the-design-specification:
	- $\{\cdot\}$ Triple-heater-test-for-inside-heater-box-temperature-during-steadystate-operation
	- $-i$ i- Blower-running-test-for-blower-flow-rate, flow-control-valve position-and-each-line's-gas-flow-rate
	- (iii)-Reaction-chamber-heatup-test-for-blower flow-rate,-flow-control valve-position, each-line's-gas-flow-rate and the time-for-heating-up .the-reaetor-eh-am-beFr
- {-e-) *P-pe-r-operatdien--ef-i.nteileeks4neldaading-opei~atden-ef-al1--eompenents subject-to-interlocking, interlocking-set-value and operating-logic
- (f) Proper-operation-of-permissive,-prohibit, and-bypass-functions
- $\left\{ \varphi \right\}$ Proper-system-operation-while-powered-from-primary and alternate sources, including-transfers, and in-degraded-modes for-which the system is expected to remain operational

14.2.12.1.73 Loose Parts Monitoring System Preoperational Test

(1) Purpose

To verify proper functioning of Loose Parts Monitoring System (LPMS) equipment.

(2) Prerequisites

The construction tests have been successfully completed, and the SCG has reviewed the test procedure and approved the initiation of testing. Reactor

revised on October **16,** 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

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Table 14.3-9 Generic Safety Issues (Continued)

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Table 14.3-10 **TMI** Issues

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Table 14.3-10 **TMI** Issues (Continued)

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3.3 INSTRUMENTATION

3.3.6.1 Post Accident Monitoring (PAM) Instrumentation

LCO 3.3.6.1 The PAM instrumentation for each Function in Table 3.3.6.1-1 shall be OPERABLE. With the revision to

(continued)

ABWR TS 3.3-60 Rev. 0. Design Control Document/Tier 2

PAM Instrumentation $3.3.6.1$

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criteria in

Technical Specifications.

1OCFR50.36 for inclusion in the

ABWR TS 3.3-61 Rev. 0, Design Control Document/Tier 2
With the revision to 10CFR50.44, H2 and 02 monitors no longer meet the criteria in 10CFR50.36 for inclusion in the Tech Spec

PAM Instrumentation 3.3.6.1

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Table 3.3.6.1-1 (page 1 of **1)** Post Accident Nonitoring Instrumentation

(a) OnLy one position indication channel is required for penetration flow paths with only one installed control room indication channel.

(b) Not required for isolation valves whose associated penetration fLow path is isolated by at Least one closed and de-activated automatic valve, closed manual valve, blind flange, or check valve with flow through the valve secured.

(c) When power is \le [10]% RTP

(d) When power is **> [101%** RTP

(e) BuLk average temperature.

ABWR TS 3.3-63 Rev. 0, Design Control Document/Tier 2

Remote Shutdown System $3.\overline{3}.6.2$

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Table 3.3.6.2-1 (page **I** of 2) Remote Shutdown System Instrumentation

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> Procedures, Programs, and Manuals 5.5

5.5 Procedures, Programs, and Manuals

5.5.2.1 Offsite Dose Calculation Manual (ODCM) (continued)

Licensee initiated changes to the **ODCM:**

- a. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
- 1. sufficient information to support the change(s) together 10CFR50.44 was with the appropriate analyses or evaluations justifying
the change(s), and
- 2003 to no longer \vert 2. a determination that the change(s) maintain the levels of radioactive effluent control required pursuant to 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, control systems (i.e., and not adversely impact the accuracy or Flammability Control | reliability of effluent, dose, or setpoint calculations;
- System, hydrogen $\begin{vmatrix} b & 5 \end{vmatrix}$ become effective after review and acceptance by plant reviews and the approval of the [Plant Superintendent]; and
- plants with inerted **points in the NRC in the form of a complete,** containments.
containments. **pontain the copy of the entire ODCM as a part of, or concurrent** with, the Radioactive Effluent Release Report for the period of the report in which any change in the **ODCM** was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

5.5.2.2 Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include the Low Pressure Core Flooder, High Pressure Core Flooder, Residual Heat Removal, Reactor Core Isolation Cooling, Hydrogen-Recombiner, Post Accident Sampling, Standby Gas Treatment, Suppression Pool Cleanup, Reactor Water Cleanup, Fuel Pool Cooling and Cleanup, Process Sampling, Containment Atmospheric Monitoring, and Fission Product Monitor. The program shall include the following:

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ABWR TS **5.0-8** Rev. 0, Design Control Document/Tier 2

r revised on October **16,** the change(s), and Irequire hydrogen. recombiners) for

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PAM Instrumentation B 3.3.6.1

BASES

With the revision to 10CFR50.44. H2 and O2 monitors no longer meet the criteria in 10CFR50.36 for inclusion in the Technical Specifications.

$C.1$

As noted in the LCO this action does not apply to Functions -11 & 12, (hydrogen/oxygen-monitors), which are addressed in -Condition-D. When a Function has two required channels that are INOPERABLE then one channel must be restored to OPERABLE status within 7 days. The Completion Time of 7 days is based on the relatively low probability of an event requiring PAM instrument operation and the availability of alternate means to obtain the required information. Continuous operation with two required channels inoperable in a Function is not acceptable because the alternate indications may not fully meet all performance qualification requirements applied to the PAM instrumentation. Therefore, requiring restoration of one inoperable channel of the Function limits the risk that the PAM Function will be in a degraded condition should an accident occur.

Multiple entry into the condition table causes Condition A to be invoked on completion of Action C.1 so appropriate additional action is taken.

$-D-1$

-When-two-hydrogen/oxygen-monitor-display-channels-areinoperable, at least one channel must be restored to -OPERABLE status within 72 hours. The 72 hour Completion Time-is-reasonable, based-on-the-backup-capability-of-the--Post-Accident-Sampling-System-to-monitor-the-hydrogen--concentration-for-evaluation-of-core-damage-and-to-provideinformation for operator decisions. Also, it is unlikely that a LOCA that would cause core damage would occur during this time.

$E.1$

÷.

This Required Action directs entry into the appropriate Condition referenced in Table 3.3.6.1-1. The applicable Condition referenced in the Table is Function dependent. If the required Act¥ons and associated Completion Times for Conditions C_{τ} or D are not met for a Function then Condition E is entered for that function and Table 3.3.6.1-1 used to transfer to the appropriate subsequent Condition.

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ABWR TS

 B 3.3-210 Rev. 0. Design Control Document/Tier 2

> PAM Instrumentation B 3.3.6.1

BASES

 $F.1$

For the PAM Functions in Table 3.3.6.1-1, if any Required Action and associated Completion Time of Condition C-or-D-is not met, the plant must be placed in a MODE in which the **LCO** does not apply. This is done by placing the plant in at least MODE 3 within 12 hours.

With the revision to 10CFR50.44, H2 and 02 monitors no longer meet the criteria in 1OCFR50.36 for inclusion in the **Technical** Specifications.

The allowed Completion Times are reasonable, based on operating experience, to reach the required plant condition from full power conditions in an orderly manner and without challenging plant systems.

G.1

Since alternate means of monitoring the parameters to which this Condition applies have been developed and tested, the Required Action is to submit a report to the NRC instead of requiring a plant shut down. These alternate means may be temporarily installed if the normal PAM channel cannot be restored to OPERABLE status within the allotted time. The report provided to the NRC should discuss the alternate means used, describe the degree to which the alternate means are equivalent to the installed PAM channels, justify the areas in which they are not equivalent, and provide a schedule for restoring the normal PAM channels.

SR 3.3.6.1.1

Performance of a CHANNEL CHECK once every [31] days ensures that a gross instrumentation failure has not occurred. A CHANNEL CHECK is a comparison of the parameter indicated on one instrumentation channel to a similar parameter on other instrumentation channels. It is based on the assumption that independent displays of the same parameter should read approximately the same value. Significant deviations between displays could be an indication of excessive instrument drift or other faults in one of the channels. A

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ABWR **TS** B 3.3-211 Rev. **0,** Design Control Document/Tier 2

> PAM Instrumentation B 3.3.6.1

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- REFERENCES 1. Regulatory Guide 1.97, "Instrumentation for Light-Water Cooled Nuclear Power Plants to Assess Plant and Environs Conditions During and Following an Accident," [Date]. < June 2006
	- 2. DCD Tier 2, Section 7.5

Date shown is date current revision was issued.

ABWR TS B 3.3-213 Rev. 0, Design Control Document/Tier 2

> Remote Shutdown System B 3.3.6.2

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B **3.3** INSTRUMENTATION

B **3.3.6.2** Remote Shutdown System

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ABWR TS B 3.3-214 Rev. 0, Design Control Document/Tier 2

Remote Shutdown System B 3.3.6.2

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BASE'S Primary Containment Hydrogen Recombiners B 3.6.3 \AA BACKGROUND The process gas circulating through the heater, the reaction (continued) chamber, and the cooler is automatically regulated to chamber, and the cooler is automatically regulated to 255 m^3/h by the use of an orifice plate in-stalled in the cooler. The process gas is heated to 718°C. The/hydrogen and oxygen gases are recombined into water vapor, which is then condensed in the water spray gas cooler by the associated residual heat removal subsystem and discharged with some of the effluent process gas to the wetwell. The majority of the cooled, effluent process gas is mixed with the incoming process gas to dilute the incoming gas β rior to the mixture entering the heater section. <u>X 7</u> **APPLICABLE** SAFETY ANALYSES 10CFR50.44 was revised on October 16. 2003 to no longer require hydrogen control systems (i.e., **Flammability Control** System, h recombiners) f<mark>or</mark> plants with inerted containme The primary containment hydrogen/recombiner provides the capability of controlling the bulk hydrogen concentration in primary containment to less than the lower flammable concentration of 4.0 v/o following a DBA. This control would prevent a primary containment wide hydrogen burn, thus ensuring that pressure and temperature conditions assumed in the analysis are not exceeded. The limiting DBA relative to hydrogen generation is a LOCA. Hydrogen may accumulate in primary containment following a LOG as a result of. a. A metal steam reaction between the zirconium fuel rod cladding and the reactor coolant; or b. Radioly tic decomposition of water in the Reactor Coolant System. To evaluate the potential for hydrogen accumulation in primary containment following a LOCA, the hydrogen generation is calculated as a function **of** time following the $int_{\mathcal{A}}$ init $\hat{\imath}$ ation of the accident. Assumptions recommended by Reference 3 are used to maximize the amount of hydrogen ca'1 cul ated. The calculation confirms that when the mitigating systems are actuated in accordance with emergency procedures, the peak hydrogen concentration in the primary containment is / 4.0 v/o (Ref. 4). The primary containment hydrogen recombiners satisfy Criterion 3 of the NRC Policy Statement. (continued ABWR TS B 3.6-62 Rev. **0,** Design Control Document/Tier ²

Primary Containment Hydrogen Recombiners B 3.6 \dot{A} .1 **B\ASES** \textsf{LCO} \longrightarrow Two primary containment hydrogen recombiners must/be OPERABLE. This ensures operation of at least one primary containment hydrogen recombiner subsystem in the event of a worst case single active failure. **** operation with at least one primary contai ment hydrogen recombiner subsystem ensures that the post LOCA hydrogen concentration can be prevented from exceeding the flammability limit. APPLICABILITY In MODES λ and 2, the two primary/containment hydrogen recombiners, are required to control the hydrogen concentration within primary containment below its flammability Nimit of 4.0 v/o/following a LOCA, assuming a 10CFR50.44 was worst case single failure. revised on October **16,** In MODE 3, both the hydrogen production rate and the total 2003 to no longer hydrogen produced after z^{\prime} LOCA would be less than that require hydrogen calculated for the DBA LOCA. Also, because of the limited time in this MODE, the γ probability of an accident requiring control systems (i.e., the primary containment hydrogen recombiner is low. Flammability Control Therefore, the primary containment hydrogen recombiner is System, hydrogen not required in MODE 3. recombiners) for In MODES 4 and β , the probability and consequences of a LOCA plants with inerted are low due to/the pressure and temperature limitations in containments. these MODES. *Therefore*, the primary containment hydrogen recombiner $\frac{1}{5}$ not required in these MODES. ACTIONS $A.1$ With'one primary containment hydrogen recombiner inoperable, the inoperable recombiner must be restored to OPERABLE status within 30 days. In this Condition, the remaining \acute{o} PERABLE recombiner is adequate to perform the hydrogen control function. However, the overall reliabilyty is reduced because a single failure in the OPERABLE recombine could result in reduced hydrogen control capability\ The 30 day Completion Time is based on the low probability of the occurrence of a LOCA that would generate hydrogen\in amounts capable of exceeding the flammability limit, the amount of time available after the event for operator action (continued) ABWR TS **B 3.6-63** Rev. 0, Design Control Document/Tier 2

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Primary Containment Hydrogen Recombiner's $B \, 3.6 \, 3.1$ **\BASE ACTIONS** $C.1$ (continued) If any Required Action and associated Completion Time cannot be met, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 12 hours/ The allowed Completion Time of 12 hours is reasonable/ based on operating experience, to reach MODE 3 from full power conditions in an orderly manner and without challenging plant systems. **SURVEILLANCE** SR 3.6.3.1.1 and SR 3.6.3.1.2

Performance of a system functional test for each primary

containment hydrogen recombiner ensures that the recombiners **REQUIREMENTS** are OPERABLE and can attain and sustain the temperature necessary for hydrogen recombination. In particular, SR $3.6.3.1.1$ verifies, every 6 months, that the minimum heater 10CFR50.44 was .44 was \qquad sheath temperature increases to \geq [316°C] in \leq [1.5 hours] and that/it is maintained \geq [316°C] for \geq [2] hours thereafter to check the ability of the revised on October 16. 2003 to no longer recombiner to function properly (and to make sure that significant heater/elements are not burned out). require hy Additionally, $SR/3.6.3.1.\lambda$ verifies, every 18 months, that control systems (i.e., the reaction chamber temperature increases to \geq [621°C] in **Flammability Control** [2] hours and that it is maintained > $[636^{\circ}C]$ and < $[662^{\circ}C]$ for \ge [2] hours. System, hydrogen recombiners) for Operating \acute{e} xperience has shown that these components usually plants with inerted pass the/Surveillance when performed at the 6 and 18 month Frequencies, respectively. Therefore, these Frequencies containments. were concluded to be acceptable from a reliability standpoint. $S\hat{R}$ 3.6.3.1.3 This SR ensures there are no physical problems that could $/$ affect recombiner operation. Since the recombiners are \diagup mechanically passive, except for the blower assemblies, they are subject to only minimal mechanical failure. The only credible failures involve loss of power or blower function, blockage of the internal flow path, missile. impact, etc. A visual inspection is sufficient to determine (continuedj / •BWR TS B 3.6-65 Rev. **0.** Design Control Document/Tier **2**

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Primary Containment Oxygen Concentration
B 3.6.3.2

B 3.6 CONTAINMENT SYSTEMS

B 3.6.3.2 Primary Containment Oxygen Concentration

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B 3.6-67

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Primary Containment Oxygen Concentration B 3.6.3.2

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18A.5 PRIMARY CONTAINMENT CONTROL GUIDELINE

PC/H Monitor and control hydrogen and oxygen concentrations

If while executing the following steps:

- Drywell or suppression chamber hydrogen concentration cannot be determined to be below 6% and drywell or suppression chamber oxygen RC-1] and execute it concurrently with this procedure; secure and preventoperation of the FCS and, initiate containment sprays in accordance with [Step] PC/H-4] until drywell and suppression chamber hydrogen concentrations can be determined to be below 6% or drywell and suppression chamber oxygen concentrations can be etermined to be below 5%.
- $PC/H-2$ Monitor and control hydrogen and oxygen concentrations in the drywell.

(PC/H-2.1 Deleted, not applicable to ABWR.)

10CFR50 44 was revised on October 16. 2003 to no longer require hydrogen control systems (i.e., **Flammability Control** System, hydrogen recombiners) for plants with inerted containments.

(PC/H-2.2 Deleted, not applicable to ABWR.)

When drywell hydrogen concentration reaches 16% (maximum hydrogen concentration for recombiner operation or 6%, whichever is lower)] and drywell oxygen concentration reaches [5% (maximum oxygenconcentration for recombiner operation or 5%, whichever is lower)], secure FCS operation.

 $PC/H-2.3$ Continue in this procedure at [Step PC/H-4].

$PC/H-3$

Monitor and control hydrogen and oxygen concentrations in the

suppression chamber.

(PC/H-3.1 Deleted, not applicable to ABWR.)

When suppression chamber hydrogen concentration reaches [0.5% (minimum hydrogen concentration for recombiner operation or minimum detectable hydrogenconcentration, whichever is higher)], but only if suppression pool level is below [11.70 m (elevation of bottom of suppression pool to lower drywell vent)], and only if drywell hydrogen concentration is below-16% (maximum hydrogen concentration for recombineroperation or 6%, whichever is lower)] or drywell oxygen concentration is below [5% (maximum oxygenconcentration for recombiner operation or 5%, whichever is lower)], place FCS in service and enterfprocedure-developed from the RPV Control Guideline] at [Step RC-1] and execute it concurrently with this procedure.

(PC/H-3.2 Deleted, not applicable to ABWR.)

 $PC/H-4$ When drywell or suppression chamber hydrogen concentration reaches 6% and drywell or suppression chamber oxygen concentration is above 5%, EMERGENCY RPV DEPRESSURIZATION IS REQUIRED.

> 10CFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., **Flammability Control** System, hydrogen recombiners) for plants with inerted containments.

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18B Differences Between BWROG EPG Revision 4 and ABWR EPG

ABWR BWROG Differences from Basis for Differences **EPG Step | EPG Rev. 4 | BWROG Rev. 4 EPG** Step *PC/H-] Override, second bullet item PC/H-] Override, second bullet item* * *Deleted phrase, "hydrogen mixing systems and" throughout this document.* Deleted "secure and prevent operation of the FCS and,.." 10CFR50.44 was revised o n October 16, 2003 to no longer require h ydrogen control systems (i.e. Flammab ility Control System, hydrogen recombin ers) for plants with inerted containm ents. * *The ABWR Flammablity Gas Control Sy&stm does not have hydrogen mixing systems.* The ABWR does not have a Flamability Control System.

Table 18B- **1** Differences Between BWROG **EPG** Revision 4 and ABWR **EPG**

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Table **18F-1** Inventory of Controls Based Upon the ABWR EPGs and PRA (Continued)

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Table **18F-1** Inventory of Controls Based Upon the ABWR EPGs and PRA (Continued)

* Provided outside the main control room.

t To be provided at main control room area panels, not at the operator control panels.

> 1OCFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

> > *Emergency Operation Information and Controls*

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Table **18F-1**

Inventory of Controls Based Upon the ABWR EPGs and PRA (Continued)

No.	Fixed Position Displays	No.	Fixed Position Displays	
1	RPV Water Level ★★	27	RHR(C) Flow $\star\star$	
2	RCIC Turbine Speed	28	RHR(C) Injection Valve Status	
3	Wetwell Pressure **	29	Emergency Diesel Generator (A) Operating Status **	
4	Suppression Pool Bulk Average Temperature $\star\star$	30	Emergency Diesel Generator (B) Operating Status **	
5	HPCF(B) Flow $\star\star$	31	Emergency Diesel Generator (C) Operating Status **	
6	HPCF(C) Flow $\star\star$	32	Primary Containment Water Level **	
7	RPV Pressure ★★	33	Condensate Storage Tank Water Level **	
8	Drywell Pressure **	34	SLC Pump(A) Discharge Pressure **	
9	Reactor Power Level, (Neutron Flux, APRM) $\star\star$	35	SLC Pump(B) Discharge Pressure **	
10	Reactor Power Level (SRNM) **	36	Main Condenser Pressure	
11	Reactor Thermal Power **	37	SRV Positions ★★	
12	MSIV Position Status (Inboard And Outboard Valves) **	38	Suppression Pool Level ★★	
13	Reactor Mode Switch Mode Indications	39	Main Steamline Flow **	
14	Main Steamline Radiation **	40	SLC Boron Tank Water Level **	
15	Scram Solenoid Lights(8) Status	41	Recirculation Pump Speeds	10CFR50.44
16	Manual Scram SW(A) Indicating Light	42	Average Drywell Temperature * Nwas revised on	
	Status			October 16,
17	Manual Scram SW(B) Indicating Light Status	43	Wetwell Hydrogen Concentration 2003 to no Level ★★	
18	RPV Isolation Status Display **	44	Drywell Hydrogen Concentration hydrogen	longer require
			Level ★★	control systems
19	RCIC Flow ★★	45	Drywell Oxygen Concentration \star (i.e.,	
20	RCIC Injection Valve Status	46	Wetwell Oxygen Concentration *Flammability	
21	HPCF(B) Injection Valve Status	47	FCS(B)-Operating-Status	Control System, hydrogen
22	HPCF(C) Injection Valve Status	48	FCS(C)-Operating-Status	recombiners) for
23	RHR(A) Flow $\star\star$	49	Main Stack Radiation Level **	plants with
24	RHR(A) Injection Valve Status	50	Time	inerted
** Denotes Regulatory Guide 1.97 Parameter				containments.

Table **18F-2** Inventory of Displays Based Upon the ABWR EPGs and PRA

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18F-2 Inventory of Displays Based Upon the ABWR EPGs and PRA (Continued)

NEDO-33330 Revision 0 *Rev. 1*

PRIMARY CONTAINMENT HYDROGEN CONTROL PC/H

NEDO-33330 Revision 0 $Rev A$

 $\left[\left[\begin{array}{ccc} \ldots \ldots \ldots \ldots \end{array}\right]\right]$

10CFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

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Emergency Procedure Guidelines

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PRIMARY **CONTAINMENT** HYDROGEN CONTROL PC/H (cont'd)

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1OCFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.
PRIMARY **CONTAINMENT** HYDROGEN CONTROL PC/H-2

NEDO-33330 Revision **0** *Rev A*

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1OCFR50.44 was revised on October **16,** 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

Emergency Procedure Guidelines 18A.5-3

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PRIMARY **CONTAINMENT** HYDROGEN CONTROL PC/H-2 (cont'd)

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10CFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

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Final Safety Analysis Report/Tier 2

PRIMARY CONTAINMENT HYDROGEN CONTROL PC/H-2 (cont'd)

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$\left[\left[\ldots,\ldots\right]\right]$

10CFR50.44 was

revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

Emergency Procedure Guidelines

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PRIMARY CONTAINMENT HYDROGEN CONTROL PC/H-2 (cont'd)

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10CFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

PRIMARY **CONTAINMENT** HYDROGEN CONTROL **PC/H-3**

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10CFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

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PRIMARY **CONTAINMENT** HYDROGEN CONTROL **PC/H-3** (cont'd)

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1 OCFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

Response

The BWR Owners' Group sponsored a program to evaluate depressurization modes other than full actuation of the ADS. The results of this program were submitted to the NRC in a letter report from D. B. Waters, Chairman of BWR Owners' Group, to D. **G.** Eisenhut, Director (NRC), dated December 29, 1980. A summary of this evaluation follows.

The cases analyzed in the letter report above show that, based on core cooling considerations, no significant improvement can be achieved by a slower depressurization rate. A significantly slower depressurization will result in increased core uncovery times before ECCS injection. Furthermore, a moderate decrease in the depressurization rate necessitates an earlier action time to initiate ADS. Such an earlier actuation time has the negative impact of providing less time for the operator to start high pressure ECCS without obtaining a significant benefit to vessel fatigue usage. This earlier actuation time necessitates a higher initiation level which would result in an increased frequency of ADS actuation.

It should be noted that the ADS is not a normal core cooling system, but is a backup for the high pressure core cooling systems such as feedwater, RCIC or HPCF. If ADS operation is required, it is because normal and/or emergency core cooling is threatened. As a full ADS blowdown is well within the design basis of the RPV and the system is properly designed to minimize the threat to core cooling, no change in depressurization rate is required or appropriate.

19A.2.12 Evaluation of Alternative Hydrogen Control Systems [Item **(1)** (xii)]

10CFR50.44 was -evised on October **16,** 2003 to no longer "equire hydrogen ýontrol systems (i.e., Flammability Control 3ystem, hydrogen ecombiners) for D1ants with inerted ;ontainments.

NRC Position

Perform an evaluation of alternative hydrogen control systems that would satisfy the requirements of paragraph $(f)(2)(ix)$ of 10 CFR 50.34 (f) . As a minimum include consideration of a hydrogen ignition and post-accident inerting system. The evaluation shall include:

- (1) A comparison of costs and benefits of the alternative systems considered.
- (2) For the selected system, analyses and test data to verify compliance with the requirements of $(f)(2)(ix)$ of 10 CFR 50.34.
- (3) For the selected system, preliminary design descriptions of equipment, function, and layout.

Response

The ABWR primary containment is inerted and is, therefore, protected from hydrogen combustion regardless of the amount or rate of hydrogen generation. In fact, increasing amounts of hydrogen moves the primary containment oxygen concentration further from the flammable regime. The ABWR-is-also-provided-with-permanently-installed

NEDO-33330 Revision 0 *Rev. 0*

10CFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

> recombiners which-prevent the-buildup-of-oxygen, due-to-radiolysis, from-creating a potentially-flammable-mixture. Radiolysis is the only potential source of oxygen in the ABWR primary containment.

See Subsection 6.2.7.1 for COL license information pertaining to alternate hydrogen control.

19A.2.13 Long-Term Training Upgrade [Item **(2)** (i)]

NRC Position

Provide simulator capability that correctly models the control room and includes the capability to simulate small-break LOCAs. (Applicable to construction permit applicants only.) [I.A.4.2]

Response

COL license information, see Subsection 19A.3.1. This will be addressed as part of simulator design which falls under operator training (Section 18.8.8).

19A.2.14 Long-Term Program of Upgrading of Procedures [Item (2) (ii)]

NRC Position

Establish a program, to begin during construction and follow into operation, for integrating and expanding current efforts to improve plant procedures. The scope of the program shall include emergency procedures, reliability analyses, human factors engineering, crisis management, operator training, and coordination with INPO and other industry efforts. (Applicable to construction permit applicants only.) [I.C.9]

Response

COL license information, see Subsection 19A.3.2.

19A.2.15 Control Room Design Reviews [Item (2) **(iii)]**

NRC Position

Provide, for Commission review, a control room design that reflects state-of-the-art human factor principles prior to committing to fabrication or revision of fabricated control room panels and layouts. [I.D.1]

Response

This item is addressed in Subsection IA.2.2.

19A.2.16 Plant Safety Parameter Display Console **(SPDS)** [Item **(2)** (iv)]

NRC Position

Provide a plant safety parameter display console that will display to operators a minimum set of parameters defining the safety status of the plant, capable of displaying

10CFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

Response

Per the response to Item $(1)(xii)$, refer to Subsection 6.2.5 for a detailed description of the inerting and-recombiner systems.

19A.2.22 Testing Requirements [Item (2) (x)]

NRC Position

Provide a test program and associated model development and conduct tests to qualify reactor coolant system relief and safety valves and, for PWRs, PORV block valves, for all fluid conditions expected under operating conditions, transients and accidents. Consideration of anticipated transient without scram (ATWS) conditions shall be included in the test program. Actual testing under ATWS conditions need not be carried out until subsequent phases of the test program are developed. [II.D.l1]

Response

This item is addressed in Subsection IA.2.9.

19A.2.23 Relief and Safety Valve Position Indication [Item (2) (xi)]

NRC Position

Provide direct indication of relief and safety valve position (open or closed) in the control room. [II.D.3]

Response

This item is addressed in Subsection IA.2.10.

19A.2.24 Auxiliary Feedwater System Automatic Initiation and Flow Indication [Item (2) (xii)]

NRC Position

Provide automatic and manual auxiliary feedwater (AFW) system initiation, and provide auxiliary feedwater system flow indication in the control room. (Applicable to PWARs only.) [II.E.1.2]

Response

This requirement is not applicable to the ABWR. It applies only to PWR-type reactors.

19A.2.25 Reliability of Power Supplies for Natural Circulation [Item (2) (xiii)]

NRC Position

Provide pressurizer heater power supply and associated motive and control power interfaces sufficient to establish and maintain natural circulation in hot standby conditions with only onsite power available. (Applicable to PWRs only.) [II.E.3.1]

Response

This requirement is not applicable to the ABWR. It applies only to PWR-type reactors.

(b) Subarticle NE-3220, Division 1, and Subarticle CC-3720, Division 2, of Section III of the July 1, 1980 ASME Boiler and Pressure Vessel Code, which are referenced in paragraphs $(f)(3)(v)(A)(1)$ and $(Q(3)(v)(B)(1)$ of 10 CFR 50.34, were approved for incorporation by reference by the Director of the Office of the Federal Register. A notice of any changes made to the material incorporated by reference will be published in the Federal Register. Copies of the ASME Boiler and Pressure Vessel Code may be purchased from the American Society of Mechanical Engineers, United Engineering Center, 345 East 47th St., New York, NY 10017. It is also available for inspection at the Nuclear Regulatory Commission's Public Document Room, 1717 H St., NW., Washington, D.C.

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- (2) (a) Containment structure loadings produced by an inadvertent full actuation of a post-accident inerting hydrogen control system (assuming carbon dioxide), but not including seismic or design basis accident loadings will not produce stresses in steel containments in excess of the limits set forth in the ASME Boiler and Pressure Vessel Code, Section III, Division 1, Subarticle NE-3220, Service Level A Limits, except that evaluation of instability is not required (for concrete containments the loadings specified above will not produce strains in the containment liner in excess of the limits set forth in the ASME Boiler and Pressure Vessel Code, Section III, Division 2, Subarticle CC-3720, Service Load Category.
	- (c) The containment has the capability to safely withstand pressure tests at 1.10 and 1.15 times (for steel and concrete containments, respectively) the pressure calculated to result from carbon dioxide inerting.

Response

- (1) The containment design basis accident pressure is 0.412 MPa. The peak pressure resulting from 100% fuel-clad metal water reaction is about 0.618 MPa (Subsection 19E.2.3.2). The containment is capable of withstanding 0.618 MPa internal pressure together with dead load by meeting the code requirements (Subsection 19E.2.3.2).
- (2) ABMTR does not employ post accident inerting; thus, item (2) does not apply.

19A-2.46-Dedicated-Penetration-Iltem-(3)-(vi)]

NRC-Position

For-plant-designs-with-external-hydrogen-recombiners, provide-redundant-dedicated containment-penetrations-so-that-assuming-a-single-failure-the-recombiner-systems-can be-connected-to-the-containment-atmosphere. [II.E.4.1]

1OCFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

10CFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

Response

This-item-is-addressed-in-Subsection-IA-2-13-

19A.2.47 Organization and Staffing to Oversee Design and Construction [Item **(3)** (vii)]

NRC Position

Provide a description of the management plant for design and construction activities, to include: (A) The organizational and management structure singularly responsible for direction of design and construction of the proposed plant; (B) Technical resources directed by the applicant; (C) Details of the interaction of design and construction within the applicant's organization and the manner by which the applicant will ensure close integration of the architect engineer and the nuclear steam supply vendor; (D) Proposed procedures for handling the transition to operation; (E) The degree of top level management oversight and technical control to be exercised by the applicant during design and construction, including the preparation and implementation of procedures necessary to guide the effort. [1I.J.3.1]

Response

COL license information, see Subsection 19A.3.7.

19A.3 COL License Information

19A.3.1 Long-Term Training Upgrade

Simulator capability that correctly models the control room and includes the capability to simulate small-break LOCAs shall be provided. (Subsection 19A.2.13.) COL License Information regarding operator training is in Section 18.8.8.

19A.3.2 Long-Term Program of Upgrading of Procedures

A long-term program of upgrading procedures shall be established to begin during construction and following term program of upgrading procedures shall be established to begin during construction and follow into operation for integrating and expanding current efforts to improve plant procedures. The scope of the program shall include emergency procedures, reliability analysis, human factors engineering, crisis management, operator training, and coordination with INPO and other industry efforts. (Subsection 19A.2.14.) COL License Information is in Section 13.5.3.1.b.

19A.3.3 Purge System Reliability

A testing program shall be provided to ensure that the large ventilation valves close within the limits assured in the radiologic design bases. (Subsection 19A.2.27.)

19A.3.4 Licensing Emergency Support Facility

The COL applicant has a requirement to provide a near site Emergency Operational Facility (EOF) (See Subsection 19A.2.37).

Table **19A-1** ABWR-CP/ML Rule Cross Reference (Continued)

NEDO-33330 Revision 0 *Rev. 0*

10CFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments. I

10CFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

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Power Reactors" (Reference 19B.2.18-1), and General Design Criterion 41, "Containment Atmosphere Cleanup", in Appendix A to 10 CFR Part 50 (Reference 19B.2.18-2), requires that systems be provided to control hydrogen concentrations in the containment atmosphere following a postulated accident to ensure that containment integrity is maintained.

Paragraph (f) (2) (ix) of 10 CFR 50.34, "Contents of Applications; Technical Information" (Reference 19B.2.18-4), requires that provision be made for a hydrogen control system that can safely accommodate hydrogen generated by the equivalent of a 100% fuel-clad metal-water reaction.

An inerted containment and-the-provision-for-permanently-installed-hydrogenrecombiners-are acceptable as hydrogen control measures.

Resolution

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The issue of a large amount of hydrogen being generated and burned within containment was resolved as stated in the NRC document SECY 89-122 dated April 19, 1989 (Reference 19B.2.18-3). This issue covers hydrogen control measures for recoverable degraded core accidents for all BWrRs. Extensive research in this area has led to significant revision of the Commission's hydrogen control regulations, given in 10 CFR 50.44, published December $2, 1981$.

The ALRcotainment is inerted and per 10 CFR 50.34 **(f)** (2) (ix) can withstand the September \Box pressure and energy addition from a 100% fuel-clad metal-water reaction. However, in 16, 2003 \vert the ABWR, there are no design-basis events that result in core uncovery or core heatup sufficient to cause significant metal-water reaction. Section 6.2.5.3 states that this is equivalent to the reaction of the active clad to a depth of 5.842E-3 mm (0.00023 inches) or 0.72% of the active clad.

Therefore, this issue is resolved for the ABWR.

References

- 19B.2.18-1 10 CFR 50.44, "Standards for Combustible Gas Control System in Light-Water-Cooled Power Reactors", Office of the Federal Register, National Archives Records Administration.
- 19B.2.18-2 10 CFR 50 Appendix A, "General Design Criteria for Nuclear Power Plants."
- 19B.2.18-3 SECY-89-122, "Resolution of Unresolved Safety Issue A-48, Hydrogen Control Measures and Effects of Hydrogen Burns on Safety Equipment", April 1989.
- 19B.2.18-4 10 CFR 50.34, "Contents of Applications; Technical Information"; Office of the Federal Register, National Archives Records Administration.

The radiation loads on the penetrations are below the TID-14844 limits so radiation is not a concern.

(11) Recombiners

10CFR50.44 was revised on October 16, 2003 to no longer require hydrogen control systems (i.e., **Flammability Control** System, hydrogen recombiners) for plants with inerted containments.

The recombiner system is needed in a long term accident (order of days) to ensure-that-the-oxygen-concentration-does-not-reach-flammability-limits. The recombiners are located outside of the primary containment. Piping is used to remove and return fluid to the primary containment. Therefore, the process fluid-provides the only significant-impact on this system. Since the supply and return-lines are isolated-during-the-early-part-of-an-event, the-recombiners are not-subjected-to-the-primary-containment-thermodynamic-loads-until-days later, after accident recovery when the environment is not as severe. At this time, recovery from a postulated accident might occur in a much less severe environment. Additionally, the integrated radiation doses will be well below the-design-basis-values. Therefore, the-recombiners-will-survive-these-accident seenarios.

(12) Pressure and Water Level Instrumentation

The pressure sensors used to measure both water level and pressure in the vessel and in the containment are located outside of containment. The conditions in the vessel and containment are monitored via pressure taps. The pressure sensors will not see the higher vessel or primary containment temperature and radiation doses due to the significant length-to-diameter ratio of the piping used in these sensors. The integrated radiation gamma dose for the pressure sensors is slightly over the equipment qualification limit set forth in Table 3I-16. However, the radiation limits set for design basis events are extremely conservative. Therefore, there is reasonable assurance that the sensors will survive this condition. Furthermore, the sensors are capable of withstanding very high overpressure events, on the order of 14 MPa, indicating that there is no possibility of damage from high containment pressures.

(13) Temperature Instrumentation

The GE standard practice is to use thermocouples rated to 575 K and 14 MPa. These ratings are well above the drywell and wetwell thermodynamic loads experienced during a postulated severe accident. Therefore, operation of the thermocouples should not be adversely affected. Comparison to radiation qualification limits are based on two day integrated dose rates. The equipment integrated radiation doses are below the equipment qualification dose rates of 2.0E+8 R and 2.0E+9 R for gamma and beta radiation, respectively, as set forth in Table 3I-16.

Table **19E.2-1** Potential Suppression Pool Bypass Lines (Continued)

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NOTES:

Legends and Acronyms

I0CFR50.44 was revised on October **16,** 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for plants with inerted containments.

19E.2-760 Deterministic Analysis of Plant Performance

Table **19E.2-29** Equipment and Instrumentation Required to Survive Severe Accident Scenarios

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Figure 19R-6 Reactor Building Arrangement-Elevation **12300** mm (1F)

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LL- 20B-1 Equipment Data Ba

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revised on October 16, 2003 to no longer require hydrogen control systems (i.e., Flammability Control System, hydrogen recombiners) for 1plants with inerted containments.

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Table 20B-1 Equipment Data Base (Continued)

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