2.0 Departures Requiring Prior NRC Approval

This section contains the departures and exemptions from the reference ABWR DCD that require prior NRC approval. These are changes to Tier 1,Tier 1 ITAAC, Tier 2* items (those listed in the tables in “Introduction to the Design Control Document” and marked with italics within brackets), Technical Specifications, and other operational requirements. These changes are numbered according to an assigned primary reference ABWR DCD section.

Section 2.1 contains Tier 1 and Tier 2* departures that are associated with changes from the design as described in the DCD. Some of these changes also require supporting changes to the text of the Technical Specifications.

Section 2.2 contains those changes that affect the Technical Specification that are not caused by the Tier 1 departures in Section 2.1.

These changes are proposed under the rules in 10 CFR 52 Appendix A, Section VIII “Processes for Changes and Departures.”

The following Tier 1 departures were evaluated against the requirements of 10 CFR 52, Appendix A Section VIII.A.4 and found to be acceptable for exemption. The Tier 2* departure requires prior NRC approval but does not require an exemption.

The following factors apply to each of the Tier 1 departures:

- the design change will not result in a significant decrease in the level of safety otherwise provided by the certified design,
- the exemption is authorized by law, will not present an undue risk to the public health and safety, and is consistent with the common defense and security
- special circumstances are present as specified in 10 CFR 50.12(a)(2); and/or
- the special circumstances outweigh any decrease in safety that may result from the reduction in standardization caused by the exemption.

A summary of the above factors applicable to each Tier 1 departure is provided in the written evaluation section for each.

The departures from the generic Technical Specifications have been evaluated against the requirements of 10 CFR 50.12 and found acceptable for exemption. For each of the following departures:

- the exemption is authorized by law, will not present an undue risk to the public health and safety, and is consistent with the common defense and security; and
- special circumstances are present as specified in 10 CFR 50.12 (a) (2).

STPNOC is not making any departures from the other operational requirements in the reference AWBR DCD and did not identify any departures from Tier 2 that require NRC approval under the criteria in Section VIII.B.5 of Appendix A to 10 CFR 52.