# Proposed COLA Text forDCD COL Item 14.3A-1:DAC Closure Schedule

NRC – ESBWR DCWG Meeting October 23, 2008

### COL Item 14.3A-1, DAC Closure Schedule: Objectives

- Background
- Present draft COLA text
- Obtain NRC feedback

DCD R5 added COL Item 14.3A-1:
 Each COL Applicant will provide a DAC ITAAC closure schedule in the COLA and identify whether the standard approach will be used.

- ESBWR DCWG proposed COLA changes to address DCD COL Item:
  - R-COLA:

North Anna Unit 3 is scheduled to be the first standard ESBWR plant licensed and will develop the first standard approach for Design Acceptance Criteria (DAC) ITAAC closure. For North Anna Unit 3, a DAC ITAAC closure schedule will be provided within one year following COLA issuance.

#### S-COLA:

Unit X is scheduled to be licensed subsequent to the reference ESBWR Plant and will use the standard approach for Design Acceptance Criteria (DAC) ITAAC closure. The DAC ITAAC completion for the first standard plant will be used.

- NRC provided feedback on September 4:
  - For some DAC, providing a DAC closure schedule within one year following issuance of the COL is too late
  - COL Applicants should consider:
    - License condition providing schedule milestones for each area of DAC
    - Milestones should be based on phased completion approach that identifies durations for phased design completion

- NRC feedback for S-COLAs:
  - Convey same schedule information as R-COLA until completion of DAC activities
  - Consider how approach may vary for longer term S-COLAs (after LTRs have been submitted and are under NRC review or have been approved)

- DCWG considered NRC feedback and prepared revisions to approaches to address DCD COL Item, based on GEH's plans for DCD R6 DAC:
  - R-COLA will provide milestones for notifying NRC of upcoming completion of DAC activities
  - S-COLAs will use R-COLA standard approach

#### o Piping:

- Licensee shall notify the NRC [ ]
  months prior to scheduled completion
  of each ASME Code certified Design
  Report
- Licensee shall notify the NRC [ ]
  months prior to scheduled completion
  of each pipe break hazards analysis

#### o 1&C:

Licensee shall notify the NRC [ ]
months prior to scheduled completion
of the Requirements Phase Baseline
Review Report for each SR and
RTNSS platform.

#### Software:

- Licensee shall notify the NRC [ ] months prior to scheduled completion of each software plan for each SR and RTNSS platform. Examples:
  - Software Management Plan
  - Software Development Plan
  - Software Integration Plan

#### o HFE:

- Licensee shall notify the NRC [ ] months prior to scheduled completion of each Results Summary Report. Examples:
  - Operating Experience Review
  - Task Analysis
  - Human Reliability Analysis

- Near-term S-COLAs will state that first standard approach is used.
- NRC proposed that S-COLA licensees convey same schedule information as R-COLA until completion of DAC activities. What was NRC's intent?
- Longer-term S-COLAs will state that first standard approach is used. Will reference LTRs and NRC closure documents

# COL Item 14.3A-1, DAC Closure Schedule: Conclusions

- Revised approaches to COL Item responsive to NRC's feedback
- COLA milestones will be revised, as required, to reflect final certified design DAC ITAAC

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### Questions/Feedback?