

**Bellefonte Nuclear Plant, Units 3 & 4**  
**COL Application**  
**Part 2, FSAR**

CHAPTER 19  
PROBABILISTIC RISK ASSESSMENT

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**CHAPTER 19**

**PROBABILISTIC RISK ASSESSMENT**

**19.1 INTRODUCTION**

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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19.2 INTERNAL INITIATING EVENTS

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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19.3 MODELING OF SPECIAL INITIATORS

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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19.4 EVENT TREE MODELS

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.



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19.5 SUPPORT SYSTEMS

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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19.6 SUCCESS CRITERIA ANALYSIS

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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19.7 FAULT TREE GUIDELINES

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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19.8 PASSIVE CORE COOLING SYSTEM - PASSIVE RESIDUAL  
HEAT REMOVAL

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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19.9 PASSIVE CORE COOLING SYSTEM - CORE MAKEUP TANKS

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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19.10 PASSIVE CORE COOLING SYSTEM - ACCUMULATOR

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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19.11 PASSIVE CORE COOLING SYSTEM - AUTOMATIC  
DEPRESSURIZATION SYSTEM

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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**19.12 PASSIVE CORE COOLING SYSTEM - IN-CONTAINMENT REFUELING  
WATER STORAGE TANK**

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.



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19.13 PASSIVE CONTAINMENT COOLING

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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19.14 MAIN AND STARTUP FEEDWATER SYSTEM

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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19.15 CHEMICAL AND VOLUME CONTROL SYSTEM

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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19.16 CONTAINMENT HYDROGEN CONTROL SYSTEM

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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19.17 NORMAL RESIDUAL HEAT REMOVAL SYSTEM

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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19.18 COMPONENT COOLING WATER SYSTEM

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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19.19 SERVICE WATER SYSTEM

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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19.20 CENTRAL CHILLED WATER SYSTEM

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.



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19.21 AC POWER SYSTEM

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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19.22 CLASS 1E DC & UPS SYSTEM

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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19.23 NON-CLASS 1E DC & UPS SYSTEM

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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19.24 CONTAINMENT ISOLATION

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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19.25 COMPRESSED AND INSTRUMENT AIR SYSTEM

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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19.26 PROTECTION AND SAFETY MONITORING SYSTEM

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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19.27 DIVERSE ACTUATION SYSTEM

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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19.28 PLANT CONTROL SYSTEM

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.



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19.29 COMMON CAUSE ANALYSIS

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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19.30 HUMAN RELIABILITY ANALYSIS

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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19.31 OTHER EVENT TREE NODE PROBABILITIES

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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19.32 DATA ANALYSIS AND MASTER DATA BANK

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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19.33 FAULT TREE AND CORE DAMAGE QUANTIFICATION

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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19.34 SEVERE ACCIDENT PHENOMENA TREATMENT

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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19.35 CONTAINMENT EVENT TREE ANALYSIS

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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19.36 REACTOR COOLANT SYSTEM DEPRESSURIZATION

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.



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19.37 CONTAINMENT ISOLATION

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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19.38 REACTOR VESSEL REFLOODING

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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19.39 IN-VESSEL RETENTION OF MOLTEN CORE DEBRIS

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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19.40 PASSIVE CONTAINMENT COOLING

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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19.41 HYDROGEN MIXING AND COMBUSTION ANALYSIS

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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19.42 CONDITIONAL CONTAINMENT FAILURE PROBABILITY  
DISTRIBUTION

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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19.43 RELEASE FREQUENCY QUANTIFICATION

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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19.44 MAAP4.0 CODE DESCRIPTION AND AP1000 MODELING

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.



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19.45 FISSION PRODUCT SOURCE TERMS

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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19.46 NOT USED

This **section** was not required for DCD and is not used by DCD and FSAR.

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19.47 NOT USED

This **section** was not required for DCD and is not used by DCD and FSAR.

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19.48 NOT USED

This **section** was not required for DCD and is not used by DCD and FSAR.

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19.49 OFFSITE DOSE EVALUATION

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This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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19.50 IMPORTANCE AND SENSITIVITY ANALYSIS

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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19.51 UNCERTAINTY ANALYSIS

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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19.52 NOT USED

This **section** was not required for DCD and is not used by DCD and FSAR.



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19.53 NOT USED

This **section** was not required for DCD and is not used by DCD and FSAR.

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19.54 LOW POWER AND SHUTDOWN PRA ASSESSMENT

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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19.55 SEISMIC MARGIN ANALYSIS

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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19.56 PRA INTERNAL FLOODING ANALYSIS

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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19.57 INTERNAL FIRE ANALYSIS

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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19.58 WINDS, FLOODS, AND OTHER EXTERNAL EVENTS

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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**19.59 PRA RESULTS AND INSIGHTS**

This **section** of the referenced DCD is incorporated by reference with the following departures and/or supplements.

**19.59.10.5 Combined License Information**

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STD COL  
19.59.10-1

A review of the differences between the as-built plant and the design used as the basis for the AP1000 seismic margins analysis will be completed prior to fuel load. A verification walkdown will be performed with the purpose of identifying differences between the as-built plant and the design. Any differences will be evaluated to determine if there is a significant adverse effect on the seismic margins analysis results. A comparison of the as-built SSC high confidence, low probability of failures (HCLPFs) to those assumed in the AP1000 seismic margin evaluation will be performed prior to fuel load. Deviations from the HCLPF values or assumptions in the seismic margin evaluation due to the as-built configuration and final analysis will be evaluated to determine if vulnerabilities have been introduced.

The requirements to which the equipment is to be purchased are included in the equipment specifications. Specifically, the equipment specifications include:

1. Specific minimum seismic requirements consistent with those used to define the Table 19.55-1 HCLPF values. This includes the known frequency range used to define the HCLPF by comparing the required response spectrum (RRS) and test response spectrum (TRS). The range of frequency response that is required for the equipment with its structural support is defined.
  2. Hardware enhancements that were determined in previous test programs and/or analysis programs will be implemented.
- 

STD COL  
19.59.10-2

A review of the differences between the as-built plant and the design used as the basis for the AP1000 PRA and **DCD Table 19.59-18** will be completed prior to fuel load. The plant specific PRA-based insight differences will be evaluated and the plant specific PRA model modified as necessary to account for plant-specific design and any design changes or departures from the design certification PRA.

It has been confirmed that the Winds, Floods, and Other External Events analysis documented in **DCD Section 19.58** is applicable to the site. The site-specific design has been evaluated and is consistent with the AP1000 PRA assumptions. Therefore, **Chapter 19** of the AP1000 DCD is applicable to this design.

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STD COL  
19.59.10-3

A review of the differences between the as-built plant and the design used as the basis for the AP1000 internal fire and internal flood analysis will be completed prior to fuel load. Differences will be evaluated to determine if there is significant adverse effect on the internal fire and internal flood analysis results.

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STD COL  
19.59.10-4

The AP1000 Severe Accident Management Guidance (SAMG) from **APP-GW-GLR-070, Reference 1 of DCD Section 19.59**, is implemented on a site-specific basis. Key elements of the implementation include:

- SAMG based on APP-GW-GLR-070 is provided to Emergency Response Organization (ERO) personnel in assessing plant damage, planning and prioritizing response actions and implementing strategies that delineate actions inside and outside the control room.
  - Severe accident management strategies and guidance are interfaced with the Emergency Operating Procedures (EOP's) and Emergency Plan.
  - Responsibilities for authorizing and implementing accident management strategies are delineated as part of the Emergency Plan.
  - SAMG training is provided for ERO personnel commensurate with their responsibilities defined in the Emergency Plan.
- 

STD COL  
19.59.10-5

A thermal lag assessment of the as-built equipment required to mitigate severe accidents (hydrogen igniters and containment penetrations) will be performed to provide additional assurance that this equipment can perform its severe accident functions during environmental conditions resulting from hydrogen burns associated with severe accidents. This assessment will be performed prior to fuel load and is required only for equipment used for severe accident mitigation that has not been tested at severe accident conditions. The ability of the as-built equipment to perform during severe accident hydrogen burns will be assessed using the Environment Enveloping method or the Test Based Thermal Analysis method discussed in EPRI NP-4354 (**DCD Section 19.59, Reference 3**).

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Add the following new information after DCD Subsection 19.59.10.5:

STD SUP  
19.59-1

**19.59.10.6 PRA Configuration Controls**

PRA configuration controls contain the following key elements:

- A process for monitoring PRA inputs and collecting new information.
- A process that maintains and updates the PRA to be reasonably consistent with the as-built, as operated plant.
- A process that considers the cumulative impact of pending changes when applying the PRA.
- A process that evaluates the impact of changes on currently implemented risk-informed decisions that have used the PRA.
- A process that maintains configuration control of computer codes used to support PRA quantification.
- A process for upgrading the PRA to meet PRA standards that the NRC has endorsed.
- Documentation of the PRA.

PRA configuration controls are consistent with the regulatory positions on maintenance and upgrades in Regulatory Guide 1.200.

**Schedule for Maintenance and Upgrades of the PRA**

The PRA update process is a means to reasonably reflect the as designed and as operated plant configurations in the PRA models. The PRA upgrade process includes an update of the PRA plus a general review of the entire PRA model, and as applicable the application of new software that implements a different methodology, implementation of new modeling techniques, as well as a comprehensive documentation effort.

- During construction, the PRA is upgraded prior to fuel load to cover those initiating events and modes of operation contained in NRC-endorsed consensus standards on PRA in effect one year prior to the scheduled date of the initial fuel load for a Level 1 and Level 2 PRA.
- Prior to license renewal the PRA is upgraded to include all modes of operation.
- During operation, PRA updates are completed as part of the upgrade process at least once every four years.

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- A screening process is used to determine whether a PRA update should be performed more frequently based upon the nature of the changes in design or procedures. The screening process considers whether the changes affect the PRA insights. Changes that do not meet the threshold for immediate update are tracked for the next regulatory scheduled update. If the screening process determines that the changes do warrant a PRA update, the update is made as soon as practicable consistent with the required change importance and the applications being used.

PRA upgrades are performed in accordance with 10 CFR 50.71(h).

Process for Maintenance and Upgrades of the PRA

Various information sources are monitored to determine changes or new information that affects the model assumptions or quantification. Plant specific design, procedure, and operational changes are reviewed for risk impact. Information sources include applicable operating experience, plant modifications, engineering calculation revisions, procedure changes, industry studies, and NRC information.

The PRA upgrade includes initiating events and modes of operation contained in NRC-endorsed consensus standards on PRA in effect one year prior to each required upgrade.

This PRA maintenance and update incorporates the appropriate new information including significant modeling errors discovered during routine use of the PRA.

Once the PRA model elements requiring change are identified, the PRA computer models are modified and appropriate documents revised. Documentation of modifications to the PRA model include the changes as well as the upgraded portions clearly indicating what has been changed. The impact on the risk insights is clearly indicated.

PRA Quality Assurance

Maintenance and upgrades of the PRA are subject to the following quality assurance provisions:

Procedures identify the qualifications of personnel who perform the maintenance and upgrade of the PRA.

Procedures provide for the control of PRA documentation, including revisions.

For updates of the PRA, procedures provide for independent review, or checking of the calculations and information.

Procedures provide for an independent review of the model after an upgrade is completed. Additionally, after the PRA is upgraded, the PRA is reviewed by

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outside PRA experts such as industry peer review teams and the comments incorporated to maintain the PRA current with industry practices. Peer review findings are entered into a tracking system. PRA upgrades receive a peer review for those aspects of the PRA that are upgraded.

PRA models and applications are documented in a manner that facilitates peer review as well as future updates and applications of the PRA by describing the processes that were used, and provide details of the assumptions made and their bases. PRA documentation is developed such that traceability and reproducibility is maintained. PRA documentation is maintained in accordance with Regulatory Position 1.3 of Regulatory Guide 1.200.

Procedures provide for appropriate attention or corrective actions if assumptions, analyses, or information used previously are changed or determined to be in error. Potential impacts to the PRA model (i.e., design change notices, calculations, and procedure changes) are tracked. Errors found in the PRA model between periodic updates are tracked using the site tracking system.

#### PRA-Related Input to Other Programs and Processes

The PRA provides input to various programs and processes, such as the Maintenance Rule implementation, reactor oversight process, the RAP, and the RTNSS program. The use of the PRA in these programs is discussed below, or cross-references to the appropriate FSAR sections are provided.

#### PRA Input to Design Programs and Processes

The PRA insights identified during the design development are discussed in **DCD Subsection 19.59.10.4** and summarized in **DCD Table 19.59-18**. **DCD Section 14.3** summarizes the design material contained in AP1000 that has been incorporated into the Tier 1 information from the PRA. A discussion of the plant features important to reducing risk is provided in **DCD Subsection 19.59.9**.

#### PRA Input to the Maintenance Rule Implementation

The PRA is used as an input in determining the safety significance classification and bases of in-scope SSCs. SSCs identified as risk-significant via the Reliability Assurance Program for the design phase (DRAP, Section 17.4) are included within the initial Maintenance Rule scope as high safety significance SSCs.

For risk-significant SSCs identified via DRAP, performance criteria are established, by the Maintenance Rule expert panel using input from the reliability and availability assumptions used in the PRA, to monitor the effectiveness of the maintenance performed on the SSCs.

The Maintenance Rule implementation is discussed in Section 17.6.

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PRA Input to the Reactor Oversight Process

The mitigating systems performance indicators (MSPI) are evaluated based on the indicators and methodologies defined in NEI 99-02.

The Significance Determination Process (SDP) uses risk insights, where appropriate, to determine the safety significance of inspection findings.

PRA Input to the Reliability Assurance Program

The PRA input to the Reliability Assurance Program is discussed in **DCD Subsection 19.59.10.1**.

PRA Input to the Regulatory Treatment of Nonsafety-Related Systems Programs

The importance of nonsafety-related SSCs in the AP1000 has been evaluated using PRA insights to identify SSCs that are important in protecting the utility's investment and for preventing and mitigating severe accidents. These investment protection systems, structures and components are included in the D-RAP/MR Program (refer to Subsection 17.4), which provides confidence that availability and reliability are designed into the plant and that availability and reliability are maintained throughout plant life through the maintenance rule. Technical Specifications are not required for these SSCs because they do not meet the selection criteria applied to the AP1000 (refer to Subsection 16.1.1).

MOV Program

The MOV Program includes provisions to accommodate the use of risk-informed inservice testing of MOVs (Subsection 3.9.6).

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APPENDIX 19A  
THERMAL HYDRAULIC ANALYSIS TO SUPPORT SUCCESS CRITERIA

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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APPENDIX 19B  
EX-VESSEL SEVERE ACCIDENT PHENOMENA

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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APPENDIX 19C  
ADDITIONAL ASSESSMENT OF AP1000 DESIGN FEATURES

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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APPENDIX 19D  
EQUIPMENT SURVIVABILITY ASSESSMENT

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This **section** of the referenced DCD is incorporated by reference with no departures or supplements.



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APPENDIX 19E  
SHUTDOWN EVALUATION

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.

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APPENDIX 19F  
MALEVOLENT AIRCRAFT IMPACT

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.