

6.0 ENGINEERED SAFETY FEATURES

6.0 Engineered Safety Features

Engineered safety features (ESF) protect the public in the event of an accidental release of radioactive fission products from the reactor coolant system (RCS). The ESF function is to localize, control, mitigate, and terminate such accidents, and to maintain radiation exposure levels to the public below applicable limits and guidelines.

Section 6.0 of the Vogtle Electric Generating Plant (VEGP) combined license (COL) Final Safety Analysis Report (FSAR), Revision 2, incorporates by reference, with no departures or supplements, Section 6.0, "Engineered Safety Features," of Revision 17 of the AP1000 Design Control Document (DCD). The Nuclear Regulatory Commission (NRC) staff reviewed the application and checked the referenced DCD to ensure that no issue relating to this section remained for review.¹ The NRC staff's review confirmed that there is no outstanding issue related to this section. The results of the NRC staff's technical evaluation of the information incorporated by reference in the VEGP COL application are documented in NUREG-1793, "Final Safety Evaluation Report [FSER] Related to Certification of the AP1000 Standard Design," and its supplements.

6.1 Engineered Safety Features Materials

This section provides the evaluation of the materials used in the fabrication of ESF components and of the provisions to avoid material interactions that could impair the operation of the ESF. The design information in VEGP COL FSAR Section 6.1 is divided into two sections, Section 6.1.1, "Metallic Materials"; and Section 6.1.2, "Organic Materials." The NRC staff's evaluation of these two FSAR sections is provided below.

6.1.1 Metallic Materials

6.1.1.1 Introduction

In this section, the NRC staff reviews metallic materials used in ESF components to ensure that they are compatible with one another and with ESF fluids. The compatibility of fluids in ESF systems should ensure that there is a low probability of causing abnormal leakage, of rapidly propagating failure, and of gross rupture of reactor coolant pressure boundary (RCPB) components. Metallic materials and fluids should also be compatible with the auxiliary systems that directly support ESF systems.

6.1.1.2 Summary of Application

Section 6.1 of the VEGP COL FSAR, Revision 2 incorporates by reference Section 6.1 of the AP1000 DCD, Revision 17. Section 6.1 of the AP1000 DCD includes Section 6.1.1.

¹ See Section 1.2.2 for a discussion of the staff's review related to verification of the scope of information to be included in a COL application that references a design certification (DC).

In addition, in VEGP COL FSAR Section 6.1.1, the applicant provided the following:

AP1000 COL Information Item

- STD COL 6.1-1

The applicant provided additional information in Standard (STD) COL 6.1-1 to resolve COL Information Item 6.1-1. STD COL 6.1-1 describes quality assurance measures for special processes in fabricating austenitic stainless steels. In a letter dated April 7, 2010, the DCD applicant, Westinghouse, proposed to revise Appendix 1A of the AP1000 DCD to remove stated exceptions to conformance with Regulatory Guide (RG) 1.44, "Control of the Use of Sensitized Steel," Revision 0. The NRC staff's review of STD COL 6.1-1 includes the information in the Westinghouse letter. The COL applicant did not submit additional information in response to this proposed DCD revision.

6.1.1.3 Regulatory Basis

The regulatory basis of the information incorporated by reference is addressed in the FSER related to the DCD.

In addition, the acceptance criteria associated with the relevant requirements of the Commission regulations for the metallic materials are given in Section 6.1.1 of NUREG-0800, "Standard Review Plan [SRP] for the Review of Safety Analysis Reports for Nuclear Power Plants."

The regulatory basis of the COL information item is described in Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, Appendix B, as it relates to the quality assurance requirements for the design, fabrication, and construction of safety-related structures, systems, and components (SSCs). Guidance for the COL information item is described in RG 1.31, "Control of Ferrite Content in Stainless Steel Weld Metal," Revision 3, and RG 1.44.

6.1.1.4 Technical Evaluation

The NRC staff reviewed Section 6.1.1 of the VEGP COL FSAR and checked the referenced DCD to ensure that the combination of the DCD and the COL application represents the complete scope of information relating to this review topic.¹ The NRC staff's review confirmed that the information in the application and incorporated by reference addresses the required information relating to metallic materials. The results of the NRC staff's evaluation of the information incorporated by reference in the VEGP COL application are documented in NUREG-1793 and its supplements.

Section 1.2.3 of this safety evaluation report (SER) provides a discussion of the strategy used by the NRC to perform one technical review for each standard issue outside the scope of the DC and use this review in evaluating subsequent COL applications. To ensure that the staff's findings on standard content that were documented in the SER with open items issued for the Bellefonte Nuclear Plant (BLN), Units 3 and 4 COL application were equally applicable to the VEGP Units 3 and 4 COL application, the staff undertook the following reviews:

- The staff compared the BLN COL FSAR, Revision 1 to the VEGP COL FSAR. In performing this comparison, the staff considered changes made to the VEGP COL FSAR (and other parts of the COL application, as applicable) resulting from requests for additional information (RAIs) and open and confirmatory items identified in the BLN SER with open items.
- The staff confirmed that all responses to RAIs identified in the corresponding standard content (the BLN SER) evaluation were endorsed.
- The staff verified that the site-specific differences were not relevant.

The staff has completed its review and found the evaluation performed for the standard content to be directly applicable to the VEGP COL application. This standard content material is identified in this SER by use of italicized, double-indented formatting. There were no confirmatory or open items related to the standard content in the BLN SER.

The following portion of this technical evaluation section is reproduced from Section 6.1.1.4 of the BLN SER:

AP1000 COL Information Item

- *STD COL 6.1-1*

The NRC staff reviewed STD COL 6.1-1 related to COL Information Item 6.1-1 included under Section 6.1.1.2 of the BLN COL FSAR, which addresses the COL information item identified in AP1000 DCD Section 6.1.3.1 related to the fabrication requirements for austenitic stainless steel.

The COL information item identified in AP1000 DCD Section 6.1.3.1 states:

The Combined License applicants referencing the AP1000 will address review of vendor fabrication and welding procedures or other quality assurance methods to judge conformance of austenitic stainless steels with Regulatory Guides 1.31 and 1.44.

This commitment was also documented as COL Action Item 6.1.1-1 in the NRC staff's FSER for the AP1000 DCD (NUREG-1793), which states:

The COL applicant will review vendor fabrication and welding procedures or other quality assurance methods to ensure that

austenitic stainless steels meet the guidelines of RGs 1.31 and 1.44.

The COL information in the FSAR that is to be added to AP1000 DCD Section 6.1.1.2 states:

In accordance with Appendix B to 10 CFR Part 50, the quality assurance program establishes measures to provide control of special processes. One element of control is the review and acceptance of vendor procedures that pertain to the fabrication, welding, and other quality assurance methods for safety related component [sic] to determine both code and regulatory conformance. Included in this review and acceptance process are those vendor procedures necessary to provide conformance with the requirements of Regulatory Guides 1.31 and 1.44 for engineered safety features components as discussed in DCD Section 6.1 and reactor coolant system components as discussed in DCD Section 5.2.3.

The staff finds the COL information provided by the applicant meets the quality assurance guidelines for austenitic stainless steels specified in RG 1.31 (weld metal ferrite content) and RG 1.44 (the use of sensitized stainless steel). The staff's conclusion is based on the applicant's statement affirming that its Appendix B quality assurance program will address the concerns of these RGs. It is also based on Appendix 1A of the AP1000 DCD, as modified by a letter dated April 7, 2010, from the AP1000 applicant. The modified DCD appendix will be incorporated by reference in a future version of the BLN COL FSAR and will indicate full conformance with these RGs. In addition, the discussions in AP1000 DCD Sections 6.1.1.2 and 5.2.3.4 provide details about how conformance will be accomplished.

6.1.1.5 Post Combined License Activities

There are no post-COL activities related to this section.

6.1.1.6 Conclusion

The NRC staff reviewed the application and checked the referenced DCD. The NRC staff's review confirmed that the applicant addressed the required information relating to metallic materials used in the ESF, and there is no outstanding information expected to be addressed in the VEGP COL FSAR related to this section. The results of the NRC staff's technical evaluation of the information incorporated by reference in the VEGP COL application are documented in NUREG-1793 and its supplements.

In addition, the staff concludes that the relevant information presented in the VEGP COL FSAR is acceptable and meets the requirements of 10 CFR Part 50, Appendix B, with the additional guidance provided in RG 1.31 and RG 1.44. The staff based its conclusion on the following:

- STD COL 6.1-1 is acceptable because the Appendix B quality assurance program proposed by the applicant provides adequate controls over vendor fabrication and welding procedures to ensure that austenitic stainless steels meet the guidelines of RG 1.31 and RG 1.44.

6.1.2 Organic Materials

6.1.2.1 Introduction

Protective coatings are applied for corrosion prevention to the interior and exterior surfaces of the containment vessel, radiologically controlled areas outside containment, and the remainder of the plant. The considerations for protective coatings differ for these four areas and the coatings selection process accounts for these differing considerations. The AP1000 design considers the function of the coatings, their potential failure modes, and their requirements for maintenance.

Other organic materials that may be present in the containment are associated with the specific type of equipment and the supplier selected to provide it. Materials are evaluated for potential interaction with the ESF to provide confidence that the performance of the ESF is not unacceptably affected.

6.1.2.2 Summary of Application

Section 6.1 of the VEGP COL FSAR, Revision 2, incorporates by reference Section 6.1 of the AP1000 DCD, Revision 17. Section 6.1 of the AP1000 DCD includes Section 6.1.2.

In addition, in VEGP COL FSAR Section 6.1.2, the applicant provided the following:

AP1000 COL Information Item

- STD COL 6.1-2

The applicant provided additional information in STD COL 6.1-2 to resolve COL Information Item 6.1-2. STD COL 6.1-2 discusses a program to control procurement, application, inspection, and monitoring of Service Level I and Service Level III coatings. In a letter dated March 31, 2010, the DCD applicant, Westinghouse, proposed revisions to COL Information Item 6.1-2 in Section 6.1.3.2 of the AP1000 DCD to address Service Level II coatings. In letters dated July 2 and August 13, 2010, the VEGP applicant proposed to revise the VEGP COL FSAR to address the updated COL Information Item 6.1-2.

6.1.2.3 Regulatory Basis

The regulatory basis of the information incorporated by reference is addressed in the FSER related to the DCD.

In addition, the acceptance criteria associated with the relevant requirements of the Commission regulations for protective coatings are given in Section 6.1.2 of NUREG-0800.

The applicable regulatory basis for acceptance of the resolution to the COL information item is described in 10 CFR Part 50, Appendix B, as it relates to the quality assurance requirements for the design, fabrication, and construction of safety-related SSCs. Guidance for the COL information item is described in RG 1.54, "Service Level I, II, and III Protective Coatings Applied to Nuclear Power Plants," Revision 1.

6.1.2.4 Technical Evaluation

The NRC staff reviewed Section 6.1.2 of the VEGP COL FSAR and checked the referenced DCD to ensure that the combination of the DCD and the COL application represents the complete scope of information relating to this review topic.¹ The NRC staff's review confirmed that the information in the application and incorporated by reference addresses the required information relating to protective coatings and other organic materials inside containment. The results of the NRC staff's evaluation of the information incorporated by reference in the VEGP COL application are documented in NUREG-1793 and its supplements.

Section 1.2.3 of this SER provides a discussion of the strategy used by the NRC to perform one technical review for each standard issue outside the scope of the DC and use this review in evaluating subsequent COL applications. To ensure that the staff's findings on standard content that were documented in the SER with open items issued for the BLN Units 3 and 4 COL application were equally applicable to the VEGP Units 3 and 4 COL application, the staff undertook the following reviews:

- The staff compared the BLN COL FSAR, Revision 1 to the VEGP COL FSAR. In performing this comparison, the staff considered changes made to the VEGP COL FSAR (and other parts of the COL application, as applicable) resulting from RAIs and open and confirmatory items identified in the BLN SER with open items.
- The staff confirmed that all responses to RAIs identified in the corresponding standard content (the BLN SER) evaluation were endorsed.
- The staff verified that the site-specific differences were not relevant.

The staff has completed its review and found the evaluation performed for the standard content to be directly applicable to the VEGP COL application. This standard content material is identified in this SER by use of italicized, double-indented formatting. Although the staff concluded that the evaluation performed for the standard content is directly applicable to the VEGP COL application, there is a difference in how the VEGP applicant addressed STD COL 6.1-2 and how the BLN applicant addressed this review item. This difference, which is based on a change proposed in the AP1000 DCD, is evaluated by the staff below, following the standard content material for STD COL 6.1-2. There was one open item (Open Item 6.1.2-1) related to the standard content in the BLN SER. Its resolution is addressed in this SER.

The following portion of this technical evaluation section is reproduced from Section 6.1.2.4 of the BLN SER:

AP1000 COL Information Item

- STD COL 6.1-2

The NRC staff reviewed STD COL 6.1-2 included under Section 6.1.2.1.6 of the BLN COL FSAR related to COL Information Item 6.1-2. COL Information Item 6.1-2 states:

The Combined License applicants referencing the AP1000 will provide a program to control procurement, application, and monitoring of Service Level I and Service Level III coatings. The program for the control of the use of these coatings will be consistent with [DCD] subsection 6.1.2.1.6.

This commitment was also captured as COL Action Item 6.1.2-1 in Appendix F of the NRC staff's FSER for the AP1000 DCD (NUREG-1793), which states:

The COL applicant will prepare a program to control procurement, application, and monitoring of Service Level I and Service Level III coatings.

The added information in the BLN COL FSAR replaces the third paragraph under the section titled, "Service Level I and Service Level III Coatings," in AP1000 DCD Section 6.1.2.1.6 with the following:

During the design and construction phase the coatings program associated with selection, procurement and application of safety related coatings is performed to applicable quality standards. Regulatory Guide 1.54 and [American Society for Testing and Materials] ASTM D5144 form the basis for the coating program. During the operations phase, the coatings program is administratively controlled in accordance with the quality assurance program implemented to satisfy 10 CFR Part 50, Appendix B, and 10 CFR Part 52 requirements. The coatings program provides direction for the procurement, application, and monitoring of safety related coating systems. Coating system monitoring requirements for the containment coating systems are based on ASTM D5163, "Establishing Procedures to Monitor the Performance of Coating Service Level I Coating Systems in an Operating Nuclear Power Plant," and ASTM D7167, "Establishing Procedures to Monitor the Performance of Safety-Related Coating Service Level III Lining Systems in an Operating Nuclear Power Plant." Any anomalies identified during coating monitoring are resolved in accordance with applicable quality assurance requirements.

The AP1000 DCD, which the applicant incorporates by reference, includes the following description of the quality assurance program:

The quality assurance program for Service Level I and Service Level III coatings conforms to the requirements of [American Society of Mechanical Engineers] ASME NQA-1-1983 as endorsed in Regulatory Guide 1.28 [“Quality Assurance Program Criteria (Design and Construction)”]. Safety related coatings meet the pertinent provisions of 10 CFR Part 50 Appendix B to 10 CFR Part 50. The service level classification of coatings is consistent with the positions given in Revision 1 of Regulatory Guide 1.54, “Service Level I, II, and III Protective Coatings Applied to Nuclear Power Plants.” Service Level I and Service Level III coatings used in the AP1000 are tested for radiation tolerance and for performance under design basis accident conditions. Where decontaminability is desired, the coatings are evaluated for decontaminability. The coating applicator submits and follows acceptable procedures to control surface preparation, application of coatings and inspection of coatings. The painters are qualified and certified, and the inspectors are qualified and certified.

The inorganic zinc coating used on the inside surface (Service Level I coatings) and outside surface (Service Level III coatings) of the containment shell is inspected using a non-destructive dry film thickness test and a MEK rub test. These inspections are performed after the initial application and after recoating. Long term surveillance of the coating is provided by visual inspections performed during refueling outages. Other inspections are not required.

Section 6.1.2 of NUREG-0800 references RG 1.54 as providing an acceptable method of complying with the quality assurance requirements in regard to protective coatings applied to ferritic steels, aluminum, stainless steel, zinc-coated (galvanized) steel, concrete, or masonry surfaces of nuclear facilities. RG 1.54 lists a number of ASTM standards that provide guidance on practices and programs that are acceptable to the NRC staff for the selection, application, qualification, inspection, and maintenance of protective coatings applied in nuclear power plants. Section 6.1.2 of NUREG-0800 also states that a coating system to be applied inside the containment vessel is acceptable if it meets the regulatory positions of RG 1.54 and the standards of ASTM D5144-00 and ASTM D3911-03. By contrast, the AP1000 DCD references RG 1.54, but only with respect to classification of coating service level as I, II, or III.

The AP1000 DCD text to be replaced with the COL information item stated that the procurement, application, and monitoring of Service Level I and Service Level III coatings are controlled by a program prepared by the COL applicant. The information provided clarified that the applicant’s coatings program, with respect to procurement, application, inspection, and monitoring, will be consistent with the recommendations of RG 1.54, which is endorsed in Section 6.1.2 of

NUREG-0800 as an acceptable method of meeting the quality assurance requirements of 10 CFR Part 50, Appendix B for safety-related and nonsafety-related coatings. However, the information provided by the applicant to resolve the COL information item merely states that the protective coatings program complies with RG 1.54, when, in fact, the program was not yet developed. Therefore, the COL applicant had not provided a coatings program as committed in COL Information Item 6.1-2.

To resolve this issue, in request for additional information (RAI) 6.1.2-1, the staff requested the following information:

- 1. The applicant should describe the standards to be applied to maintenance of the protective coatings in the program description. The description of the proposed coatings program should also describe the standards to be applied to selection and qualification of coatings, if the applicant intends to use coatings systems different than those described in the AP1000 DCD, either during construction or after plant operation commences.*
- 2. The program description should describe the administrative controls that will be applied to the coatings program.*
- 3. Provide the schedule for full implementation of the coatings program with respect to major milestones in the construction of the plant; for example, prior to application of coatings, prior to preparation of surfaces to be coated, or prior to procurement of coatings materials.*

In a letter dated May 23, 2008, the applicant provided the following response:

- Item 1) The coating program will be based on Revision 1 of RG 1.54 and the referenced ASTM standards in ASTM D5144. Also, the guidance provided in ASTM D5163, "Establishing Procedures to Monitor the Performance of Coating Service Level I Coating Systems in an Operating Nuclear Power Plant," and in ASTM D7167, "Establishing Procedures to Monitor the Performance of Coating Service Level III Coating Systems in an Operating Nuclear Power Plant," will be used to specify monitoring (maintenance) requirements for the safety-related coating systems pertaining to containment. While a change in coating systems (from those described in the AP1000 DCD) is not anticipated, if a different safety-related coating system is needed, it will be evaluated in accordance with the appropriate change process, i.e., 10 CFR 50.59 or 10 CFR Part 52, Appendix D, Section VIII.*
- Item 2) FSAR Section 6.1.3.2, Coating Program, will be revised to indicate compliance with 10 CFR Part 50, Appendix B, and 10 CFR Part 52 requirements implemented by the quality assurance program for the plant (see FSAR Chapter 17 and Part 11 of the COL application) for design, construction, and operation of the units.*

Item 3) During the design and construction phase, the requirements for the coating program will be contained in certified drawings and/or standards and specifications controlling the coating processes of the designer (Westinghouse); these design documents will be available prior to the procurement and application of the coating material by the constructor of the plant. Prior to initial fuel loading, a consolidated plant coating program will be in place to address procurement, application, and monitoring (maintenance) of those coating system(s) for the life of the plant.

The staff finds the applicant's response to Item 1 acceptable because, pursuant to RG 1.54, ASTM D5163 provides guidelines that are acceptable to the NRC staff for establishing an in-service coatings monitoring program for Service Level I coating systems in operating nuclear power plants and for Service Level II and other areas outside containment (as applicable). The applicant also specified ASTM D7167 for monitoring (maintenance) requirements for the safety-related coating systems pertaining to containment. Although ASTM D7167 is not listed in RG 1.54 or ASTM D5144, the staff finds it an appropriate standard because it addresses maintenance of Service Level III coatings. Additionally, ASTM D7167 references ASTM D4541 and ASTM D3359, which are listed in RG 1.54 as acceptable standards for maintenance of protective coatings in nuclear power plants. Further, if a change in any of the originally specified coatings systems is necessary, the applicant will use an appropriate process, either the 10 CFR 50.59 or 10 CFR Part 52, Appendix D, Section VIII process, to evaluate the change. The staff finds the application of these regulations an appropriate alternative to control of the selection of coatings by the consolidated coatings program.

The BLN application references later versions of ASTM D5144 and ASTM D5163 than those referenced in RG 1.54, Revision 1. The use of the 2008 revision of ASTM D5144 is acceptable because it provides detailed requirements through reference to other coatings standards applicable to BLN. In this regard, it is not changed with respect to the 2000 revision referenced in the RG 1.54, Revision 1. Similarly, the 2005 revision of ASTM D5163 is referenced in the BLN COL application rather than the 1996 revision referenced in RG 1.54, Revision 1. The staff finds this acceptable because the NRC staff has accepted the 2005 revision of ASTM D5163 as the basis for the Aging Management Program XI.S8 in NUREG-1801, "Generic Aging Lessons Learned (GALL) Report," Volume 2, Revision 2 (license renewal). With respect to simulated design-basis accident qualification testing for coatings, the staff notes that the applicable version of ASTM D3911 is the 1995 revision, as indicated in Appendix 1A of the AP1000 DCD.

In response to Item 2, the applicant stated that the administrative controls spelled out in its Quality Assurance Program Document (QAPD) will be applied to the coatings program. The staff finds that this will ensure compliance with the requirements of 10 CFR Part 50, Appendix B, which is a regulatory acceptance criterion of Section 6.1.2 of NUREG-0800. However, the staff notes that the

QAPD references ASME NQA-1-1994 as an acceptable means to implement the requirements of 10 CFR Part 50, Appendix B, rather than ASME NQA-1-1983 as referenced by AP1000 DCD Section 6.1.2.1.6. ASME NQA-1-1994 is used as the basis for NUREG-0800 Section 17.5, "Quality Assurance Program Description - Design Certification, Early Site Permit and New License Applicants," which is applicable to the quality assurance program for a COL. Therefore, the staff finds the use of ASME NQA-1-1994 acceptable with respect to quality assurance requirements for coatings.

The staff finds the response to Item 3 acceptable because the applicant indicated the consolidated plant coating program will be in place to address procurement, application, and monitoring (maintenance) of those coating system(s) for the life of the plant, prior to initial fuel loading. During the construction phase, the requirements for the coating program will be contained in certified drawings and/or standards and specifications controlling the coating processes, which meets the requirements of 10 CFR Part 50, Appendix B, Criterion III with respect to design control and instructions, Criterion IV with respect to procurement document control, and Criterion V with respect to procedures and drawings.

*The applicant also provided proposed changes to BLN COL FSAR Section 6.1.2.1.6 to incorporate the information included in the response to RAI 6.1.2-1. The staff confirmed that FSAR Section 6.1.2.1.6 has been revised to include information on the quality assurance program. However, since the information proposed to be added does not include the detailed information on control of coatings during the design and construction phase, the staff identified **Open Item 6.1.2-1** to ensure that BLN COL FSAR Section 6.1.2.1.6 is revised to include the information from the response to RAI 6.1.2-1, Item 3, related to control of the coating program during the design and construction phase and the schedule for full implementation of the consolidated coatings program.*

Resolution of Standard Content Open Item 6.1.2-1

Standard Content Open Item 6.1.2-1 was identified by the staff because the information the BLN applicant provided about the control of coatings during the design and construction phase, although acceptable, was not included in the BLN COL FSAR. In the July 2, 2010, letter, the VEGP applicant proposed inserting the three paragraphs below in Section 6.1.2.1.6 of the VEGP FSAR. These paragraphs would replace the third paragraph under "Service Level I and Service Level III Coatings" in DCD Section 6.1.2.1.6.

During the design and construction phase, the coatings program associated with selection, procurement and application of safety related coatings is performed to applicable quality standards. The requirements for the coatings program are contained in certified drawings and/or standards and specifications controlling the coating processes of the designer (Westinghouse) (these design documents will be available prior to the procurement and application of the coating material by the constructor of the plant). Regulatory Guide 1.54 and ASTM D5144 ([FSAR] Reference 201) form the basis for the coatings program.

During the operations phase, the coatings program is administratively controlled in accordance with the quality assurance program implemented to satisfy 10 CFR Part 50, Appendix B, and 10 CFR Part 52 requirements. The coatings program provides direction for the procurement, application, inspection, and monitoring of safety related coating systems. Prior to initial fuel loading, a consolidated plant coatings program will be in place to address procurement, application, and monitoring (maintenance) of those coating system(s) for the life of the plant.

Coating system monitoring requirements for the containment coating systems are based on ASTM D5163 ([FSAR] Reference 202), "Standard Guide for Establishing Procedures to Monitor the Performance of Coating Service Level I Coating Systems in an Operating Nuclear Power Plant," and ASTM D7167 ([FSAR] Reference 203), "Standard Guide for Establishing Procedures to Monitor the Performance of Safety-Related Coating Service Level III Lining Systems in an Operating Nuclear Power Plant." Any anomalies identified during coating inspection or monitoring are resolved in accordance with applicable quality assurance requirements.

As discussed above in the portion of the staff's evaluation reproduced from Section 6.1.2.4 of the BLN SER, the staff found the COL information related to control of coatings during the design and construction phase acceptable. The staff finds that the FSAR revisions proposed above are consistent with the information reviewed for the BLN SER and applicable to VEGP. Therefore, the staff finds the FSAR revisions proposed in the July 2, 2010, letter, acceptable for closing Open Item 6.1.2-1. The incorporation of these proposed revisions is being tracked as **Confirmatory Item 6.1-1**.

Evaluation of Additional Design Information

As discussed above, AP1000 DCD Section 6.1.3.2 requires the COL applicants to provide a program for procurement, application, and monitoring of Service Level I and Service Level III coatings consistent with DCD Section 6.1.2.1.6. However, DCD Section 6.1.2.1.6 also states that COL applicants will also address the program for Service Level II coatings, and that coatings programs for Service Level I, II, and III will include inspection. Therefore, in a letter dated March 31, 2010, the AP1000 DCD applicant proposed the following revision to DCD Section 6.1.3.2:

The Combined License applicants referencing the AP1000 will provide programs to control procurement, application, inspection, and monitoring of Service Level I, Service Level II, and Service Level III coatings. The programs for the control of the use of these coatings will be consistent with subsection 6.1.2.1.6.

In letters dated July 2 and August 13, 2010, the VEGP applicant addressed the addition of Service Level II to the COL information item by proposing the following additions to Section 6.1.2.1.6 of the VEGP COL FSAR. The first is a new second paragraph under "Service Level II Coatings" in DCD Section 6.1.2.1.6.

Such safety-related Service Level II coatings used inside containment are procured to the same standards as Service Level I coatings with regard to

radiation tolerance and performance under design basis accident conditions as discussed below.

The second addition replaces the second sentence of the third paragraph under “Service Level II Coatings” in DCD Section 6.1.2.1.6.

Coating system application, inspection, and monitoring requirements for the Service Level II coatings used inside containment will be performed in accordance with a program based on ASTM D5144 ([FSAR] Reference 201), “Standard Guide for Use of Protective Coating Standards in Nuclear Power Plants,” and the guidance of ASTM D5163 ([FSAR] Reference 202), “Standard Guide for Establishing Procedures to Monitor the Performance of Coating Service Level I Coating Systems in an Operating Nuclear Power Plant.” Any anomalies identified during coating inspection or monitoring are resolved in accordance with applicable quality requirements.

The NRC staff finds it acceptable to procure Service Level II coatings in containment to the same standards as Service Level I coatings because the staff, through RG 1.54, has endorsed the use of these standards to procure safety-related coatings inside containment. The staff also finds it acceptable to use ASTM D5144 and D5163 as a basis for application, inspection, and monitoring requirements for Service Level II coatings. As discussed in RG 1.54, ASTM D5144 is a top-level standard that provides general guidance on coating programs and detailed guidance by reference to other ASTM standards. Since it contains a single set of application requirements for all coatings, the staff finds it an acceptable basis for Service Level II coatings application and inspection. The staff finds ASTM D5163 acceptable for monitoring Service Level II coatings in containment because the use of ASTM D5163 conforms to the guidance in RG 1.54 for monitoring the performance of safety-related (Service Level I) coatings in containment, and there is no separate standard for Service Level II coatings. The incorporation of the proposed revisions to address Service Level II coatings into a future revision of the VEGP COL FSAR is being tracked as **Confirmatory Item 6.1-2**.

6.1.2.5 Post Combined License Activities

There are no post-COL activities related to this section.

6.1.2.6 Conclusion

The NRC staff reviewed the application and checked the referenced DCD. The NRC staff’s review confirmed that the applicant addressed the required information relating to protective coatings and other organic materials inside containment, and there is no outstanding information expected to be addressed in the VEGP COL FSAR related to this section. The results of the NRC staff’s technical evaluation of the information incorporated by reference in the VEGP COL application are documented in NUREG-1793 and its supplements.

In addition, the staff concludes, pending closure of **Confirmatory Items 6.1-1 and 6.1-2**, that the relevant information presented in the VEGP COL FSAR is acceptable and meets the requirements of 10 CFR Part 50, Appendix B, with the additional guidance provided in RG 1.54. The staff based its conclusion on the following:

- STD COL 6.1-2 is acceptable because the Appendix B quality assurance program, with the additional guidance provided in RG 1.54, provides adequate controls over the programs to control procurement, application, inspection, and monitoring of Service Level I, Service Level II, and Service Level III coatings.

6.2 Containment Systems

6.2.1 Introduction

The containment systems (CSs), which include the primary containment, passive cooling system (heat removal system), isolation system, containment atmosphere cleanup systems, hydrogen control system, and leak rate test system, are discussed in this section. The containment encloses the reactor system and is the final barrier against the release of significant amounts of radioactive fission products in the event of an accident. The containment structure must be capable of withstanding, without loss of function, the pressure and temperature conditions resulting from postulated loss-of-coolant, steam line break, or feed water line break accidents. The containment structure must also maintain functional integrity in the long term following a postulated accident; i.e., it must remain a low leakage barrier against the release of fission products for as long as postulated accident conditions require.

6.2.2 Summary of Application

Section 6.2 of the VEGP COL FSAR, Revision **2**, incorporates by reference Section 6.2 of the AP1000 DCD, Revision **17**. Section 6.2 of the DCD includes Sections 6.2.1, "Containment Functional Design"; 6.2.2, "Passive Containment Cooling System"; 6.2.3, "Containment Isolation System"; 6.2.4, "Containment Hydrogen Control System"; and 6.2.5, "Containment Leak Rate Test System." DCD Section 6.2.5 is evaluated by the NRC staff in Section 6.2.6 of NUREG-1793. NUREG-1793 also includes the staff's evaluation of the following issues:

- Fracture prevention of the containment pressure boundary in accordance with NUREG-0800, Section 6.2.7
- In-containment refueling water storage tank (IRWST) hydrodynamic loads

There are no COL information items associated with the review of either of these issues. The staff's evaluation of the incorporated by reference sections that address fracture prevention of the containment pressure boundary is found in Section 3.8 of this SER. With respect to the hydrodynamic loads, the staff's evaluation may be found in Section 6.2.8 of NUREG-1793.

The staff's evaluation of the containment cleanliness program associated with Generic Safety Issue (GSI)-191, "Assessment of Debris Accumulation on PWR [Pressurized-Water Reactor] Sump Performance," is evaluated in Section 6.3 of this SER.

In addition, in VEGP COL FSAR Section 6.2.5, the applicant provided the following:

AP1000 COL Information Item

- STD COL 6.2-1

The applicant provided additional information in STD COL 6.2-1 to address COL Information Item 6.2-1 and COL Action Item 6.2.6-1, which addresses the containment leak rate test program. In addition, VEGP COL FSAR Table 1.9-203, "Listing of Unresolved Safety Issues and Generic Safety Issues," includes a line item for Task Action Plan Item A-23, "Containment Leak Testing." This item is addressed in VEGP COL FSAR Section 6.2.5.1, STD COL 6.2-1.

License Conditions

- Part 10, License Condition 3, Item G.8

This proposed license condition states that the COL holder shall implement the containment leakage rate testing program prior to initial fuel load, as stated in VEGP COL FSAR Table 13.4-201, "Operational Programs Required by NRC Regulations."

- Part 10, License Condition 6

This proposed license condition states that the COL holder shall provide an operational program schedule to support NRC inspections.

6.2.3 Regulatory Basis

The regulatory basis of the information incorporated by reference is addressed in the FSER related to the DCD.

In addition, the acceptance criteria associated with the relevant requirements of the Commission regulations for containment leak rate testing are given in Section 6.2.6 of NUREG-0800.

The regulatory requirements related to this section are established in General Design Criteria (GDC) 52, "Capability for Containment Leakage Rate Testing"; GDC 53, "Provisions for Containment Testing and Inspection"; GDC 54, "Piping System Penetrating Containment"; and 10 CFR Part 50, Appendix J, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors." In addition, the staff used guidance found in Nuclear Energy Institute (NEI) 94-01, as endorsed and modified by RG 1.163, "Performance-Based Containment Leak-Test Program."

The staff used the guidelines of NuStart Technical Report, AP-TR-NS01-A, Revision 2, "Containment Leak Rate Test Program," dated April 4, 2007, to review the operational program, Containment Leakage Rate Testing Program.

6.2.4 Technical Evaluation

The NRC staff reviewed Section 6.2 of the VEGP COL FSAR and checked the referenced DCD to ensure that the combination of the DCD and the COL application represents the complete scope of information relating to this review topic.¹ The NRC staff's review confirmed that the information in the application and incorporated by reference addresses the required information relating to the containment systems. The results of the NRC staff's evaluation of the information

incorporated by reference in the VEGP COL application are documented in NUREG-1793 and its supplements.

Section 1.2.3 of this SER provides a discussion of the strategy used by the NRC to perform one technical review for each standard issue outside the scope of the DC and use this review in evaluating subsequent COL applications. To ensure that the staff's findings on standard content that were documented in the SER with open items issued for the BLN Units 3 and 4 COL application were equally applicable to the VEGP Units 3 and 4 COL application, the staff undertook the following reviews:

- The staff compared the BLN COL FSAR, Revision 1 to the VEGP COL FSAR. In performing this comparison, the staff considered changes made to the VEGP COL FSAR (and other parts of the COL application, as applicable) resulting from RAIs and open and confirmatory items identified in the BLN SER with open items.
- The staff confirmed that all responses to RAIs identified in the corresponding standard content (the BLN SER) evaluation were endorsed.
- The staff verified that the site-specific differences were not relevant.

The staff has completed its review and found the evaluation performed for the standard content to be directly applicable to the VEGP COL application. This standard content material is identified in this SER by use of italicized, double-indented formatting. There were no confirmatory or open items related to the standard content in the BLN SER.

The following portion of this technical evaluation section is reproduced from Section 6.2.4 of the BLN SER:

AP1000 COL Information Item

- STD COL 6.2-1

The NRC staff reviewed STD COL 6.2-1 related to COL Information Item 6.2-1 included under Section 6.2.5 of the BLN COL FSAR regarding the text added to Section 6.2.6 of the COL application. The added text references the program, which was reviewed and approved by the NRC in a letter from Stephanie Coffin, NRC, to Marilyn Kray, NuStart, "Final Safety Evaluation for AP1000 Technical Report No. AP-TR-NS01, Containment Leak Rate Test Program (TAC No. MD5136)," dated October 25, 2007.

License Conditions

- Part 10, License Condition 3, Item G.8
- Part 10, License Condition 6

The portion of License Conditions 3 and 6 relevant to this SER section is the containment leakage rate testing program listed in BLN COL FSAR

Table 13.4-201. As noted in Section 13.4 of this SER, the containment leakage rate testing program meets the criteria for an operational program as specified in SECY-05-0197, "Review of Operational Programs in a Combined License Application and Generic Emergency Planning Inspections, Tests, Analyses, and Acceptance Criteria." Therefore, the NRC staff finds License Conditions 3 and 6 acceptable, with respect to the inclusion of the containment leakage rate testing program in Table 13.4-201.

Due to discrepancies in the implementation milestones provided in various locations in the BLN COL application, RAI 6.2.6-1 was forwarded to the applicant. The applicant's response was that the milestones were meant to reflect the implementation of an approved testing program and when the tests were actually to be performed. However, the applicant agreed that this was not consistently reflected. The discrepancies have been addressed in BLN COL FSAR, Table 13.4-201, sheet 2 of 7, and Part 10, License Conditions and ITAAC. The changes indicate that the containment leak rate testing program will be implemented prior to initial fuel load. This RAI is closed.

6.2.5 Post Combined License Activities

For the reasons discussed in the technical evaluation section above, the staff proposes to include the following license conditions related to the containment leakage rate testing program:

- License Condition (6-1) - The licensee shall implement the containment leakage rate testing program prior to initial fuel load.
- License Condition (6-2) - The licensee shall submit to the appropriate Director of the Office of New Reactors (NRO) a schedule, no later than 12 months after issuance of the COL, that supports planning for and conduct of NRC inspections of the containment leakage rate testing program. The schedule shall be updated every 6 months until 12 months before scheduled fuel loading, and every month thereafter until either the containment leakage rate testing program has been fully implemented or the plant has been placed in commercial service, whichever comes first.

6.2.6 Conclusion

The NRC staff reviewed the application and checked the referenced DCD. The NRC staff's review confirmed that the applicant addressed the required information relating to the containment systems, and there is no outstanding information expected to be addressed in the VEGP COL FSAR related to this section. The results of the NRC staff's technical evaluation of the information incorporated by reference in the VEGP COL application are documented in NUREG-1793 and its supplements.

In addition, the staff concludes that the relevant information presented in the VEGP COL FSAR is acceptable and complies with the guidance and staff positions in RG 1.163. The staff based its conclusion on the following:

- STD COL 6.2-1, as related to the containment leak rate testing program, is acceptable because the NRC staff has determined that the requirements of 10 CFR Part 50, Appendix J, have been met.

6.3 Passive Core Cooling System (Related to RG 1.206, Section C.III.1, Chapter 6, C.I.6.3, "Emergency Core Cooling System")

6.3.1 Introduction

The passive core cooling system is designed to provide emergency core cooling to mitigate design-basis events that involve a decrease in the RCS inventory, such as a loss-of-coolant accident (LOCA), a decrease in heat removal by the secondary system, such as a feedwater system piping failure, or an increase in heat removal by the secondary system, such as a steam system piping failure. It also provides core cooling for shutdown events, such as a loss of normal residual heat removal system during a shutdown operation. The passive core cooling system is designed to perform the following safety-related functions:

- emergency core decay heat removal
- RCS emergency makeup and boration
- safety injection
- containment sump pH control

During long-term operation, the AP1000 passive core cooling system must withstand the effects of debris loading on the containment recirculation screens, IRWST screens and the fuel assemblies. The concern that debris may lead to unacceptable head loss for the recirculating flow was raised in GSI-191 and it is the topic of Bulletin 2003-01, "Potential Impact of Debris Blockage on Emergency Sump Recirculation at Pressurized-Water Reactors," and Generic Letter (GL) 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation during Design Basis Accidents at Pressurized-Water Reactors." Section 6.3 of the AP1000 DCD includes an evaluation of this issue and Section 6.2.1.8 of NUREG-1793 includes the staff's review, which was performed in accordance with the NRC-approved evaluation methodology.

6.3.2 Summary of Application

Section 6.3 of the VEGP COL FSAR, Revision 2, incorporates by reference Section 6.3 of the AP1000 DCD, Revision 17. Section 6.3 of the DCD includes Section 6.3.2.2.7, "IRWST and Containment Recirculation Screens"; Section 6.3.8.1, "Containment Cleanliness Program"; and Section 6.3.8.2, "Verification of Water Sources for Long-Term Recirculation Cooling Following a LOCA."

In addition, in VEGP COL FSAR Section 6.3.8.1, the applicant provided the following:

AP1000 COL Information Items

- STD COL 6.3-1

The applicant provided additional information in STD COL 6.3-1 to address COL Information Item 6.3-1 identified in AP1000 DCD Table 1.8-2, "Summary of AP1000 Standard Plant

Combined License Information Items.” STD COL 6.3-1 requires the applicant to develop a containment cleanliness program to limit the amount of debris that might be left in the containment following refueling and maintenance outages.

Section 1.9 of the VEGP COL FSAR, Revision 2, incorporates by reference Section 1.9, “Compliance With Regulatory Criteria,” of the AP1000 DCD, Revision 17. Section 1.9 of the DCD includes Section 1.9.4.2.3, “New Generic Issues,” and Section 1.9.5.5, “Operational Experience.”

In addition, in VEGP COL FSAR Section 1.9, the applicant provided the following information related to the effect of debris accumulation on long-term cooling:

- STD COL 1.9-3

The applicant provided additional information in STD COL 1.9-3 to address the review of GSI-191.

- STD COL 1.9-2

The applicant provided additional information in STD COL 1.9-2 to address the review of Bulletin 03-01 and GL 04-02.

6.3.3 Regulatory Basis

The regulatory basis of the information incorporated by reference is addressed in the FSER related to the DCD.

In conducting its review of STD COL 6.3-1, the NRC staff used the guidance and staff positions of RG 1.82, Revision 3, “Potential Impact of Debris Blockage on Emergency Recirculation during Design Basis Accidents at Pressurized-Water Reactors,” and NEI 04-07, “Pressurized Water Reactor Sump Performance Evaluation Methodology,” Revision 0, Volume 1, as supplemented by the NRC in the “Safety Evaluation by the Office of Nuclear Reactor Regulation Related to NRC Generic Letter 2004-02,” in NEI 04-07, Revision 0, Volume 2.

6.3.4 Technical Evaluation

The NRC staff reviewed Section 6.3 of the VEGP COL FSAR and checked the referenced DCD to ensure that the combination of the DCD and the COL application represents the complete scope of information relating to this review topic.¹ The NRC staff’s review confirmed that the information in the application and incorporated by reference addresses the required information relating to the passive core cooling system. The results of the NRC staff’s evaluation of the information incorporated by reference in the VEGP COL application are documented in NUREG-1793 and its supplements.

Section 1.2.3 of this SER provides a discussion of the strategy used by the NRC to perform one technical review for each standard issue outside the scope of the DC and use this review in evaluating subsequent COL applications. To ensure that the staff’s findings on standard content that were documented in the SER with open items issued for the BLN Units 3 and 4

COL application were equally applicable to the VEGP Units 3 and 4 COL application, the staff undertook the following reviews:

- The staff compared the BLN COL FSAR, Revision 1 to the VEGP COL FSAR. In performing this comparison, the staff considered changes made to the VEGP COL FSAR (and other parts of the COL application, as applicable) resulting from RAIs and open and confirmatory items identified in the BLN SER with open items.
- The staff confirmed that all responses to RAIs identified in the corresponding standard content (the BLN SER) evaluation were endorsed.
- The staff verified that the site-specific differences were not relevant.

The staff has completed its review and found the evaluation performed for the standard content to be directly applicable to the VEGP COL application. This standard content material is identified in this SER by use of italicized, double-indented formatting. There was one confirmatory item (Confirmatory Item 6.3-1) related to the standard content in the BLN SER. Its resolution is addressed in this SER.

The following portion of this technical evaluation section is reproduced from Section 6.3.4 of the BLN SER:

AP1000 COL Information Items

- *STD COL 6.3-1*

The applicant provided additional information in STD COL 6.3-1 to address COL Action Item 6.2.1.8.1-1 identified in NUREG-1793 and COL Information Item 6.3-1 identified in Table 1.8-2 of the AP1000 DCD. The applicant added information to BLN COL FSAR Section 6.3.8.1, "Containment Cleanliness Program," providing details of the program and procedures to minimize the amount of debris that might be left in containment following refueling and maintenance outages, including requirements for cleanliness inspections and limits on materials introduced into containment. TVA states that the cleanliness program will be consistent with the evaluation discussed in the AP1000 DCD.

In its June 9, 2009, response to RAI 6.2.2-1, the applicant addressed the changes made to Revision 17 of the AP1000 DCD in APP-GW-GLE-002 and staff questions on cleanliness measurements with a modification to STD COL 6.3-1. This included adding that the cleanliness program will meet the DCD limits on latent debris, that housekeeping procedures will be implemented to return work areas to original conditions upon completion of work, and that a sampling program will be used to quantify the amount of latent debris. The sampling program is stated to be consistent with NEI 04-07 Volumes 1 (guidance report) and 2 (NRC safety evaluation). The sampling will be done after containment exit cleanliness inspections, prior to start up, and the results will be evaluated post-start up. Any non-conforming results will be addressed in the Corrective Action Program.

*The resulting cleanliness program is consistent with the RG 1.82 recommendation that procedures be in place to regularly clean the containment and to control and remove foreign materials from containment. The sampling program included in STD COL 6.3-1 is required to demonstrate that the latent debris found in containment is within the AP1000 DCD specified limits of 130 pounds, of which, up to 6.6 pounds may be fibrous material. The DCD specified limits were demonstrated to be acceptable through scale testing and analysis. Thus, STD COL 6.3-1 is consistent with the RG 1.82 recommendation that the cleanliness program be correlated to the amount of debris used in the long term cooling analysis. It is appropriate that the sampling program be in accordance with NEI 04-07, Volumes 1 and 2, because these documents contain the most recent NRC-approved evaluation methodology for cleanliness programs. The response to RAI 6.2.2-1 is acceptable and incorporation of the changes to STD COL 6.3-1 in the BLN FSAR will be tracked as **Confirmatory Item 6.3-1**.*

The staff reviewed the following information in the BLN COL FSAR as it relates to the effect of debris accumulation on long term cooling:

- STD COL 1.9-3

The applicant added information to Section 1.9.4.2.3, "New Generic Issues," regarding Issue 191. The applicant states that the design aspects are addressed by the AP1000 DCD and the COL applicant portions are the protective coatings program discussed in BLN COL FSAR Section 6.1.2.1.6 and the containment cleanliness program discussed in BLN COL FSAR Section 6.3.8.1. The staff agrees that these are the only two COL items identified in the staff's review of GSI-191 from Section 6.2.1.8 of NUREG-1793.

- STD COL 1.9-2

The applicant added line items for Bulletin 03-01 and GL 04-02 in Table 1.9-204, "Generic Communications Assessment." The new information states that the design aspects are addressed in the AP1000 DCD and that the COL applicant aspects are addressed in BLN COL FSAR Section 6.3 for Bulletin 03-01 and BLN COL FSAR Section 6.3.8.1 for GL 04-02. The staff agrees that the design aspects of these generic communications are addressed in the staff's review of GSI-191 from Section 6.2.1.8 of NUREG-1793. The COL applicant aspects are addressed in the staff's review of BLN COL FSAR Section 6.1.2.1.6 and BLN COL FSAR Section 6.3.8.1.

Resolution of Standard Content Confirmatory Item 6.3-1

Confirmatory Item 6.3-1 required the applicant to update its FSAR to include the information related to the cleanliness program provided in the BLN applicant's above-mentioned June 9, 2009, response to RAI 6.2.2-1 (which was endorsed by the VEGP applicant). The NRC

staff verified that the VEGP COL FSAR was appropriately updated with this information. As a result, Confirmatory Item 6.3-1 is resolved.

6.3.5 Post Combined License Activities

There are no post-COL activities related to this section.

6.3.6 Conclusion

The NRC staff reviewed the application and checked the referenced DCD. The NRC staff's review confirmed that the applicant addressed the required information relating to the passive containment cleanliness program, and there is no outstanding information expected to be addressed in the VEGP COL FSAR related to this section. The results of the NRC staff's technical evaluation of the information incorporated by reference in the VEGP COL application are documented in NUREG-1793 and its supplements.

In addition, the staff concludes that the relevant information presented in the VEGP COL FSAR is acceptable and meets the regulatory requirements and guidance discussed in Section 6.3.3 of this SER. The staff based its conclusion on the following:

- STD COL 6.3-1 is acceptable because the containment cleanliness program complies with the guidance in RG 1.82.
- STD COL 1.9-3, related to GSI-191, is acceptable because the only two items that need to be addressed by the COL applicant have been resolved. The protective coatings program is evaluated in SER Section 6.1.2, and the containment cleanliness program is evaluated under STD COL 6.3-1.
- STD COL 1.9-2, related to Bulletin 03-01 and GL 04-02, is acceptable because the only two items that need to be addressed by the COL applicant have been resolved. The protective coatings program is evaluated in SER Section 6.1.2, and the containment cleanliness program is evaluated under STD COL 6.3-1.

6.4 Habitability Systems

6.4.1 Introduction

The design and operation of a set of systems provide habitability functions for the AP1000 design. These systems include the nuclear island non-radioactive ventilation system (VBS), the main control room (MCR) emergency habitability system (VES), the radiation monitoring system (RMS), the plant lighting system (ELS), and the fire protection system (FPS).

6.4.2 Summary of Application

Section 6.4 of the VEGP COL FSAR, Revision 2, incorporates by reference Section 6.4 of the AP1000 DCD, Revision 17.

In addition, in VEGP COL FSAR Section 6.4, the applicant provided the following:

AP1000 COL Information Items

- STD COL 6.4-1

The applicant provided a list of onsite chemicals in VEGP COL FSAR Table 6.4-201 to supplement the list of chemicals identified in Table 6.4-1 of the AP1000 DCD. The chemicals in Table 6.4-201 associated with STD COL 6.4-1 (as annotated in the left margin) include: hydrogen (both in a gas and liquid form), nitrogen, carbon dioxide, hydrazine, morpholine, sulfuric acid, sodium hydroxide, fuel oil, sodium molybdate, sodium hexametaphosphate, sodium hypochlorite and ammonium comp polyethoxylate. In a letter dated June 17, 2010, the applicant proposed modifications to the FSAR regarding the storage of standard and plant-specific chemicals described under STD COL 6.4-1 and VEGP COL 6.4-1. In a letter dated July 3, 2010, the applicant proposed modifications to the FSAR related to the size and stated location of the liquid hydrogen storage tank.

- STD COL 6.4-2

The applicant provided additional information in STD COL 6.4-2 to address COL Information Item 6.4-2 regarding the procedures and training for control room (CR) habitability pursuant to the resolution of GSI-83, "Control Room Habitability."

- VEGP COL 6.4-1

The applicant provided VEGP COL 6.4-1 to address COL Information Item 6.4-1. The local toxic gas services are evaluated to determine the need for monitoring for CR habitability. In a letter dated June 17, 2010, the applicant proposed modifications to the FSAR regarding the storage of standard and plant-specific chemicals described under STD COL 6.4-1 and VEGP COL 6.4-1.

- VEGP COL 9.4-1b

The applicant referred to VEGP COL FSAR Section 2.2.3 and VEGP ESP SSAR Section 2.2.3 for the evaluation of site-specific onsite chemicals.

Supplemental Information

- STD SUP 6.4-1

The applicant provided supplemental information in STD SUP 6.4-1 to address CR doses for accident analyses in the downwind unit of a dual unit site.

- VEGP SUP 6.4-2

The applicant supplemented DCD Section 6.4.4 by stating that the hazard due to the effects of a design basis accident (DBA) from Units 1 and 2 is discussed in Section 2.2.3.4 of the VEGP Early Site Permit (ESP) Application Site Safety Analysis Report (SSAR), Revision 5.

- STD SUP 6.4-3

The applicant provided a list of onsite chemicals in VEGP COL FSAR Table 6.4-201 to supplement the list of chemicals identified in Table 6.4-1 of the DCD. In a letter dated June 17, 2010, the applicant combined the chemicals listed individually under STD SUP 6.4-3 and STD COL 6.4-1 in Table 6.4-201 into one list of chemicals under STD COL 6.4-1 and deleted the left margin annotations for STD SUP 6.4-3. STD SUP 6.4-3 no longer appears in the FSAR and, consequently, the staff did not prepare a separate evaluation of STD SUP 6.4-3 in this SER.

6.4.3 Regulatory Basis

The regulatory basis of the information incorporated by reference is addressed in the FSER related to the DCD.

In addition, the acceptance criteria associated with the relevant requirements of the Commission regulations for habitability systems are given in Section 6.4 of NUREG-0800.

MCR habitability is addressed in the following regulations and guidance:

- GDC 4, "Environmental and Dynamic Effects Design Bases," as it relates to SSCs important to safety being designed to accommodate the effects of and to be compatible with the environmental conditions associated with postulated accidents.
- GDC 5, "Sharing of Structures, Systems and Components," as it relates to ensuring that sharing among nuclear power units of SSCs important to safety will not significantly impair the ability to perform safety functions, including, in the event of an accident in one unit, an orderly shutdown and cooldown of the remaining unit(s).
- GDC 19, "Control Room," as it relates to maintaining the nuclear power unit in a safe condition under accident conditions and providing adequate radiation protection.
- 10 CFR 50.34(f)(2)(xxviii), as it relates to evaluations and design provisions to preclude certain MCR habitability problems.
- 10 CFR 52.80(a), which requires that a COL application address the proposed inspections, tests, and analyses, including those applicable to emergency planning, that the licensee shall perform, and the acceptance criteria that are necessary and sufficient to provide reasonable assurance that, if the inspections, tests, and analyses are performed and the acceptance criteria met, the facility has been constructed and will operate in conformity with the COL, the provisions of the Atomic Energy Act, and the NRC's regulations.
- Three Mile Island (TMI) Action Plan, Item III.D.3.4, "Control Room Habitability."
- RG 1.78, "Evaluating the Habitability of a Nuclear Power Plant Control Room During a Postulated Hazardous Chemical Release," Revision 1.

- RG 1.52, "Design, Inspection, and Testing Criteria for Air Filtration and Adsorption Units of Post Accident Engineered Safety Feature Atmosphere Cleanup Systems in Light Water Cooled Nuclear Power Plants," Revision 3, June 2001.
- RG 1.196, "Control Room Habitability at Light Water Nuclear Power Reactors," May 2003.

6.4.4 Technical Evaluation

The NRC staff reviewed Section 6.4 of the VEGP COL FSAR and checked the referenced DCD to ensure that the combination of the DCD and the COL application represents the complete scope of information relating to this review topic.¹ The NRC staff's review confirmed that the information in the application and incorporated by reference addresses the required information relating to habitability systems. The results of the NRC staff's evaluation of the information incorporated by reference in the VEGP COL application are documented in NUREG-1793 and its supplements.

Section 1.2.3 of this SER provides a discussion of the strategy used by the NRC to perform one technical review for each standard issue outside the scope of the DC and use this review in evaluating subsequent COL applications. To ensure that the staff's findings on standard content that were documented in the SER with open items issued for the BLN Units 3 and 4 COL application were equally applicable to the VEGP Units 3 and 4 COL application, the staff undertook the following reviews:

- The staff compared the BLN COL FSAR, Revision 1 to the VEGP COL FSAR, except for the evaluation of STD SUP 6.4-2 and STD COL 6.4-1. For these two items, the staff compared the BLN COL FSAR, Revision 2 to the VEGP COL FSAR. In performing this comparison, the staff considered changes made to the VEGP COL FSAR (and other parts of the COL application, as applicable) resulting from RAIs and open and confirmatory items identified in the BLN SER with open items.
- The staff confirmed that all responses to RAIs identified in the corresponding standard content (the BLN SER) evaluation were endorsed.
- The staff verified that the site-specific differences were not relevant.

The staff has completed its review and found the evaluation performed for the standard content to be directly applicable to the VEGP COL application. This standard content material is identified in this SER by use of italicized, double-indented formatting. There was one open item (Open Item 6.4-2) related to the standard content in the BLN SER. Its resolution is addressed in this SER.

AP1000 COL Information Items

- STD COL 6.4-1

The following portion of this technical evaluation section is reproduced from Section 6.4.4 of the BLN SER. The staff notes that Table 6.4-202 in the BLN FSAR, Revision 2, is equivalent to Table 6.4-201 in the VEGP COL FSAR. Information in the BLN COL FSAR having a left margin annotation STD SUP 6.4-2 was assigned a left margin annotation of STD SUP 6.4-3 in the VEGP COL FSAR, and revisions proposed by the applicant, described below, combined the information from STD SUP 6.4-3 and STD COL 6.4-1 under a single left margin annotation of STD COL 6.4-1. Therefore, the evaluation of STD COL 6.4-1 in this SER includes references to material identified as STD SUP 6.4-2 in the BLN COL FSAR.

- *STD SUP 6.4-2*

STD SUP 6.4-2 provides the chemical names, state of the chemical, quantity and location of the chemicals. The chemicals include: hydrogen (both in a gas and liquid form), hydrazine, morpholine, sulfuric acid, sodium hydroxide, fuel oil, sodium molybdate (molybdic acid, disodium salt), sodium hexametaphosphate, and sodium hypochlorite.

Subsequent to the issuance of Section 2.2.3 of this report, the staff reviewed the applicant's inventory of chemicals contained in STD SUP 6.4-2 for threats to CR habitability. The staff has determined, with the exception of hydrazine, that the STD SUP 6.4-2 chemicals do not warrant additional analysis for CR habitability because they do not exceed the immediate danger to life and health (IDLH) limit at ground level at the location of the CR.

Regarding hydrazine, a further analysis with the HABIT computer code (RG 1.78) confirms that the hydrazine may exceed the IDLH limit at ground level. However, additional analysis shows that the hydrazine concentrations at the CR intake and inside the CR will not exceed the IDLH limit when crediting the design of the CR ventilation intake located at the auxiliary building (57 ft. above ground), calculations show concentrations much less than the IDLH limit. These results are based on a temperature of 25 °C and a wind speed of 1 m/sec, with meteorology F class, which are the conditions used by the applicant and RG 1.78. Hence, it is determined that the hydrazine listed in STD SUP 6.4-2 will not pose a threat to CR habitability.

AP1000 COL Information Items

- *STD COL 6.4-1*

STD COL 6.4-1 information also provides the chemical names, state of the chemical, quantity and location of the chemicals. The chemicals include: nitrogen, carbon dioxide, and ammonium comp polyethoxylate.

Subsequent to the issuance of Section 2.2.3 of this report, the staff reviewed the applicant's inventory of chemicals listed in STD COL 6.4-1, and screened out the toxic chemicals that do not pose a threat to CR habitability. The staff has determined that with the exception of carbon dioxide the STD COL 6.4-1

chemicals do not warrant additional analysis because they do not exceed the IDLH limit at ground level at the location of the CR.

Regarding carbon dioxide, analysis with the HABIT computer code (RG 1.78) finds that carbon dioxide will not exceed the IDLH limit at ground level. This analysis is based on a temperature of 25 °C and a wind speed of 1 m/sec, with meteorology F class, which are the conditions used by the applicant and RG 1.78. Hence, it is determined that the carbon dioxide contained in STD COL 6.4-1 will not pose a threat to CR habitability.

*The staff notes that the chemical analysis relied on by the COL applicant includes assumptions associated with design features, such as the intake location for the CR ventilation system. In RAI 6.4-8, the staff asked if any of the analyses of the chemicals in Table 6.4-202 credit design features, such as an elevated CR intake, to keep the chemical concentration in the CR below the IDLH levels, in which case a description of the design features credited in the safety analyses should be provided in the FSAR. This is **Open Item 6.4-1**.*

Resolution of Standard Content Open Item 6.4-1

In a letter dated June 17, 2010, the applicant proposed modifications to Table 6.4-201 in the VEGP COL FSAR to address Open Item 6.4-1. The proposed modifications included addition of a column entitled "MCR Habitability Impact Evaluation" to the table that indicated when design features were considered in the impact evaluation, including either the MCR intake height or other design details beyond the intake height. The staff determined that the modifications sufficiently described the design assumptions considered by the applicant, and Open Item 6.4-1 is resolved. The incorporation of this modification to Table 6.4-201 into a future revision of the VEGP COL FSAR is being tracked as **Confirmatory Item 6.4-1**.

Evaluation of Additional Revisions to STD COL 6.4-1

In the letter dated June 17, 2010, the applicant proposed additional voluntary revisions to Table 6.4-201 in the VEGP COL FSAR regarding the storage of standard chemicals described under STD COL 6.4-1. The proposed revisions included changes to the chemical quantities, evaluated distances, and storage locations, as well as changes to the table organization, column headings, and table notes. The proposed revisions also included combining the chemicals listed under separately STD COL 6.4-1 and STD SUP 6.4-3 under a single left margin annotation of STD COL 6.4-1, thereby eliminating STD SUP 6.4-3.

In a letter dated July 30, 2010, the applicant proposed additional revisions to STD COL 6.4-1 related to the evaluated maximum quantity and location of the liquid hydrogen storage tank.

On April 14 and June 7, 2010, the NRC staff audited the applicant's proprietary calculation notes, APP-VES-M3C-006, entitled "Main Control Room Emergency Habitability from Toxic Chemical Effluents," Revision 0 and Revision 1 to verify the information supporting STD COL 6.4-1 and VEGP COL FSAR Table 6.4-201. As a result of these audits, the staff issued RAI 6.4-5. The applicant subsequently prepared calculation notes APP-PGS-M3C-011, entitled "AP1000 Gas Spill or Release Effects on Control Room Habitability," Revision 0 and Revision 1 that were audited by the staff on July 26 and August 23, 2010. In a letter dated

September 3, 2010, the applicant proposed the following changes to the FSAR and provided the following additional information about calculated concentrations of chemicals that would occur at the MCR intake to address RAI 6.4-5:

- Proposed to change the evaluated minimum distance between the MCR and the storage locations for liquid hydrogen, nitrogen, and carbon dioxide.
- For hydrogen, nitrogen, and carbon dioxide, proposed to indicate that MCR design details were considered in evaluating the potential impact to the MCR.
- Proposed to clarify that the MCR design details considered included MCR volume, envelope boundaries, ventilation systems, and occupancy factor.
- Provided information about how the analysis considered the effect of wind speeds less than 1 meter/second.
- Provided information about concentrations occurring at the MCR intake more than two minutes after a potential release occurs.
- For hydrogen, nitrogen, and carbon dioxide, provided information about concentrations occurring at the MCR intake when no building wake effects are considered.
- For carbon dioxide, provided information about concentrations occurring in the MCR based on a corrected conservative value for the MCR outside air exchange rate.

In the evaluation presented in Section 2.2.3 of this SER, the staff reviewed the applicant's revised chemical inventory information listed in STD COL 6.4-1, and screened out the toxic chemicals that do not pose a threat to MCR habitability. The staff determined that, with the exception of hydrazine and carbon dioxide, the STD COL 6.4-1 chemicals do not warrant additional analysis for MCR habitability because they would not exceed the IDLH limit at ground level below the MCR ventilation intake. Hydrazine and carbon dioxide are evaluated below.

Regarding hydrazine, the NRC staff used the HABIT computer code (as referenced in RG 1.78) to confirm that hydrazine concentration may exceed the IDLH limit at ground level below the MCR intake. The staff then conducted an additional analysis showing that the hydrazine concentration at the MCR intake and inside the MCR would not exceed the IDLH limit when crediting the design of the MCR ventilation intake located at the auxiliary building (which is located 17.37 m (57 ft) above ground). The applicant annotated "IH" in VEGP COL FSAR Table 6.4-201 to indicate that the credit of MCR ventilation intake height had been taken in the safety analysis.

Regarding carbon dioxide, the NRC staff has used the HABIT computer code to confirm that the carbon dioxide concentration may exceed the IDLH limit at the MCR intake. The staff then conducted an additional analysis showing that the carbon dioxide concentration inside the MCR would remain below the IDLH limit.

Based on the FSAR revisions proposed and additional information provided by the applicant and the confirmatory analyses performed by the staff, the staff determined that the hydrazine and carbon dioxide would not pose a threat to MCR habitability, and RAI 6.4-5 is closed.

The incorporation of the revisions to STD COL 6.4-1 Table 6.4-201 into a future revision of the VEGP COL FSAR, as proposed in letters from the applicant dated June 17, July 3, and September 3, 2010, is being tracked as **Confirmatory Item 6.4-2**.

The following portion of this technical evaluation section is reproduced from Section 6.4.4 of the BLN SER:

- *STD COL 6.4-2*

The NRC staff reviewed STD COL 6.4-2, related to COL Information Item 6.4-2 and COL Action Item 6.4-1, included under Section 6.4.3 of the BLN COL FSAR. The applicant stated that procedures and training for CR habitability are written in accordance with Section 13.5 for CR operating procedures, and Section 13.2 for operator training. In Section 6.4.3 of the FSAR, the applicant states that the procedures and training will be verified to be consistent with the intent of GSI-83.

However, the level of detail provided in the standard portion of BLN COL FSAR Section 6.4.3 is not adequate to determine if the regulatory requirements are met. As a result, the staff issued RAI 6.4-7, which asked the applicant to provide in the FSAR the essential elements of the training and procedures necessary to demonstrate that the regulatory requirements are met. The staff questioned what the operators would be directed and trained to do to meet the recommendations in RG 1.196. Specifically, in RAI 6.4-7, the staff requested information addressing the following:

- *RG 1.78, Regulatory Position C.5, "Emergency Planning"*
- *RG 1.196, Regulatory Position 2.5, "Hazardous Chemicals"*
- *RG 1.196, Regulatory Position 2.2.1, "Comparison of System Design, Configuration, and Operation with the Licensing Basis"*
- *RG 1.196, Regulatory Position 2.7.1, "Periodic Evaluations and Maintenance"*

*The resolution of RAI 6.4-7 is identified as **Open Item 6.4-2**.*

Resolution of Standard Content Open Item 6.4-2

The BLN response to RAI 6.4-7 dated January 5, 2010, stated that the operational aspects of the identified guidance had been met as documented in BLN COL FSAR Appendix 1AA. The BLN applicant's response also stated that the additional information would be provided in a future revision to BLN COL FSAR Section 6.4.3, addressing how procedures, testing and training related to CR habitability would be consistent with the above stated regulatory positions

in RG 1.78 and RG 1.196. The VEGP applicant endorsed the BLN response to RAI 6.4-7 in a letter dated June 17, 2010, and committed to appropriately update Section 6.4.3 of the VEGP COL FSAR. Therefore, Standard Content Open Item 6.4-2 is resolved for the VEGP application, and incorporation of the proposed revision to Section 6.4.3 of the VEGP COL FSAR is being tracked as **Confirmatory Item 6.4-3**.

- VEGP COL 6.4-1

The NRC staff reviewed VEGP COL 6.4-1, related to COL Information Item 6.4-1 included under Section 6.4.4 of the VEGP COL FSAR. As part of VEGP COL 6.4-1, Table 6.4-201 of the VEGP COL FSAR provides information on the chemical names, physical states, quantities, and locations for VEGP site-specific impact evaluations. VEGP COL 6.4-1 also provides information on the evaluated minimum distance between the chemical storage location and the MCR.

In a letter dated June 17, 2010, the applicant proposed modifications to Table 6.4-201 in the VEGP COL FSAR regarding the storage of site specific onsite chemicals described under VEGP COL 6.4-1. The proposed modifications included changes to the evaluated distances; changes to the table organization, column headings, and table notes; and inclusion of an additional column that addressed how the evaluation of MCR habitability impacts for each chemical was performed.

In the evaluation presented in Section 2.2.3 of this SER, the staff reviewed the applicant's inventory of chemicals in VEGP COL 6.4-1, and screened out the toxic chemicals that do not pose a threat to MCR habitability. The staff determined that, with the exception of methoxypropylamine (MPA) and ammonium bisulfate, the VEGP COL 6.4-1 chemicals do not warrant additional analysis for MCR habitability because their concentrations would not exceed the IDLH limit at ground level at the intake of the MCR.

In response to RAIs 6.4-2 and 6.4-3, on March 5, 2010, the applicant provided additional information on the physical properties of MPA and ammonium bisulfate. The applicant also provided information on the input values of variables used to model the concentrations of MPA and ammonium bisulfate resulting from releases of these compounds and increased the input value used for the MCR air exchange rate.

On April 14 and June 7, 2010, the NRC staff audited the applicant's calculation notes, APP-VES-M3C-006, Revision 0 and Revision 1, to verify VEGP COL 6.4-1 information in VEGP COL FSAR Table 6.4-201. In addition, the staff performed a confirmatory analysis using the HABIT computer code and concluded that the MPA and ammonium bisulfite concentrations at the MCR intake and inside the MCR would not exceed the IDLH limits when crediting the design of the MCR ventilation intake located at the auxiliary building (17.37 m [57 ft] above ground). Based on the audit and confirmatory analysis, the staff determined that the MPA and ammonium bisulfite listed in VEGP COL 6.4-1 would not pose a threat to MCR habitability. Therefore, RAI 6.4-2 is closed.

In its March 5, 2010, response to RAI 6.4-3 (issued on February 5, 2010), the applicant proposed revisions to VEGP COL FSAR Section 2.2.3.2.3.1, which analyzes a case of a hydrazine release from a 6,644 gallon tank located near Vogle Units 1 and 2. The staff performed a confirmatory analysis using the HABIT computer code and concluded that the

hydrazine concentrations at the MCR intake would remain below the IDLH limit. As a result, RAI 6.4-3 is closed. Incorporation of the applicant's proposed revisions into a future version of the FSAR is being tracked as Confirmatory Item 2.2-1.

- VEGP COL 9.4-1b

The applicant referred to VEGP COL FSAR Section 2.2.3 and VEGP ESP SSAR Section 2.2.3 for the evaluation of site-specific onsite chemicals. The staff has already reviewed Section 2.2.3 of the VEGP ESP SSAR and found the information included therein to be acceptable as documented in NUREG-1923. Section 2.2.3 of this SER includes the remainder of the review for site-specific onsite chemicals. The staff concluded that the information in VEGP ESP SSAR Section 2.2.3 and in Section 2.2.3 of this SER to be sufficient to resolve this COL item.

Supplemental Information

The following portion of this technical evaluation section is reproduced from Section 6.4.4 of the BLN SER:

- STD SUP 6.4-1

The NRC staff reviewed STD SUP 6.4-1 related to the evaluation of CR doses in the other unit of a dual unit plant included under Section 6.4.4 of the BLN COL FSAR. The staff concludes that STD SUP 6.4-1 is acceptable because the dose to the CR operators at an adjacent AP1000 due to a radiological release from another unit is bounded by the dose to CR operators on the affected unit. Further, simultaneous accidents at multiple units at a common site are not considered to be a credible event, unless there is a reliance on shared systems between the two units. This is not the case for the AP1000 design. STD SUP 6.4-1 is also evaluated by the NRC staff in SER Section 15.9, "Radiological Consequences of Accidents."

Clarification of Statement in the Standard Content Evaluation Text

The NRC staff identified a statement in the text reproduced above from Section 6.4.4 of the BLN SER that requires clarification for the VEGP COL application. The BLN SER states that STD SUP 6.4-1 is also evaluated by the NRC staff in SER Section 15.9, "Radiological Consequences of Accidents." For this SER, the entire review of STD SUP 6.4-1 appears in this SER section.

- VEGP SUP 6.4-2

The applicant supplemented DCD Section 6.4.4 by stating that the hazard due to the effects of a DBA from Units 1 and 2 is discussed in Section 2.2.3.4 of the VEGP ESP SSAR. The staff has already reviewed Section 2.2.3.4 of the VEGP ESP SSAR and found the information included therein to be acceptable as documented in NUREG-1923. The staff concludes that the information in VEGP ESP SSAR Section 2.2.3.4 is sufficient to satisfy the requirements of VEGP SUP 6.4-2. Hence, the NRC staff considers this SUP item resolved.

6.4.5 Post Combined License Activities

For the reasons discussed in the technical evaluation above, the following FSAR commitment is identified as the responsibility of the licensee:

- FSAR Commitment 6.4-1. The licensee's CR operator training program shall address the following:
 - Regulatory Position C.5, "Emergency Planning," of RG 1.78
 - Regulatory Position 2.5, "Hazardous Chemicals," of RG 1.196
 - Regulatory Position 2.2.1, "Comparison of System Design, Configuration, and Operation with Licensing Basis," of RG 1.196
 - Regulatory Position 2.7.1, "Periodic Evaluations and Maintenance," of RG 1.196

6.4.6 Conclusion

The NRC staff reviewed the application and checked the referenced DCD. The NRC staff's review confirmed that the applicant addressed the required information relating to MCR habitability, and there is no outstanding information expected to be addressed in the VEGP COL FSAR related to this section. The results of the NRC staff's technical evaluation of the information incorporated by reference in the VEGP COL application are documented in NUREG-1793 and its supplements.

In addition, the staff concludes, pending closure of **Confirmatory Items 6.4-1, 6.4-2, and 6.4-3** that the information presented in the VEGP COL FSAR is acceptable because it meets the acceptance criteria associated with the relevant requirements of the Commission regulations for habitability systems given in Section 6.4 of NUREG-0800. The staff based its conclusions on the following:

- STD COL 6.4-1 is acceptable because the chemicals do not exceed the IDLH limit at ground level at the intake of the MCR, using the regulatory guidance in RG 1.78.
- STD COL 6.4-2 is acceptable because the procedures, testing and training related to MCR habitability will be consistent with the stated regulatory positions in RG 1.78 and RG 1.196.
- VEGP COL 6.4-1 is acceptable because the plant-specific chemicals do not exceed the IDLH limit at ground level at the intake of the MCR, using the regulatory guidance in RG 1.78.
- VEGP COL 9.4-1b is acceptable based on the NRC staff evaluation of site-specific onsite chemicals as documented in NUREG-1923.
- STD SUP 6.4-1 is acceptable because the dose to the MCR operators at an adjacent AP1000 due to a radiological release from another unit is bounded by the dose to MCR

operators on the affected unit, using the regulatory guidance in Section 6.4 of NUREG-0800.

- VEGP SUP 6.4-2 is acceptable based on the NRC staff evaluation of the hazard due to the effects of a DBA from Units 1 and 2 as documented in NUREG-1923.

6.5 Fission Product Removal and Control Systems

In the event of a design basis LOCA there is an assumed core degradation that results in a significant release of radioactivity to the containment atmosphere. This activity would consist of noble gases, particulates, and a small amount of elemental and organic iodine. Fission product removal and control systems are considered to be those systems for which credit is taken in reducing accidental release of fission products. The AP1000 design has no active system to control fission products in the containment following a postulated accident. The fission product control system is the primary containment. AP1000 DCD, Appendix 15B, "Removal of Airborne Activity from the Containment Atmosphere Following a LOCA," discusses satisfactory removal of airborne activity (elemental iodine and particulates) from the containment atmosphere by natural removal processes (e.g., deposition and sedimentation) without the use of containment spray.

Section 6.5 of the VEGP COL FSAR, Revision 2, incorporates by reference, with no departures or supplements, Section 6.5 of Revision 17 of the AP1000 DCD. The NRC staff reviewed the application and checked the referenced DCD to ensure that no issue relating to this section remained for review.¹ The NRC staff's review confirmed that there is no outstanding issue related to this section. The results of the NRC staff's technical evaluation of the information incorporated by reference in the VEGP COL application are documented in NUREG-1793 and its supplements.

6.6 Inservice Inspection of Class 2, 3, and MC Components (Related to RG 1.206, Section C.III.1, Chapter 6, C.I.6.6, "Inservice Inspection of Class 2 and 3 Components")

6.6.1 Introduction

Inservice inspection (ISI) programs must meet requirements of 10 CFR 50.55a, "Codes and Standards," in which Section XI of the ASME Boiler and Pressure Vessel Code (ASME Code) is incorporated by reference. This section addresses the ISI of ASME Code Class 2 and 3 components. ASME Code Class 2 and 3 components must meet the applicable inspection requirements set forth in Subsections IWC and IWD of Section XI of the ASME Code, "Rules for Inservice Inspection (ISI) of Nuclear Power Plant Components." Subsection IWC and IWD also include requirements for preservice examinations prior to initial plant startup as provided in Subarticles IWC-2200 and IWD-2200.

6.6.2 Summary of Application

Section 6.6 of the VEGP COL FSAR, Revision 2, incorporates by reference Section 6.6 of the AP1000 DCD, Revision 17.

In addition, in VEGP COL FSAR Section 6.6, the applicant provided the following:

AP1000 COL Information Items

- STD COL 6.6-1

The applicant provided additional information in STD COL 6.6-1 to address COL Information Item 6.6-1. The information relates to plant-specific preservice inspection (PSI) and ISI programs.

- STD COL 6.6-2

The applicant provided additional information in STD COL 6.6-2 to address COL Information Item 6.6-2. The information relates to preservation of component accessibility design considerations during the construction phase.

Supplemental Information

- STD SUP 6.6-1

The applicant provided supplemental information to add additional text to AP1000 DCD Section 6.6.1. The information relates to the design stage consideration of component accessibility to enable the performance of ISI examinations.

License Condition

- Part 10, License Condition 6

This proposed license condition states that the COL holder shall provide an operational (PSI/ISI) program schedule to support NRC inspections.

6.6.3 Regulatory Basis

The regulatory basis of the information incorporated by reference is addressed in the FSER related to the DCD.

In addition, the acceptance criteria associated with the relevant requirements of the Commission regulations for ISI of Class 2 and 3 components are given in Section 6.6 of NUREG-0800.

The applicable regulatory requirements for acceptance of the resolution of COL information items and supplementary information on ISI and testing of Class 2 and 3 components are established in GDC 45, "Inspection of Cooling Water System," found in 10 CFR Part 50, Appendix A, as it relates to periodic inspection of important components, such as heat exchangers and piping to assure the integrity and capability of the system.

The applicable policy for acceptance of COL information items, as it relates to fully describing an operational program, is found in SECY-05-0197.

6.6.4 Technical Evaluation

The NRC staff reviewed Section 6.6 of the VEGP COL FSAR and checked the referenced DCD to ensure that the combination of the DCD and the COL application represents the complete scope of information relating to this review topic.¹ The NRC staff's review confirmed that the information in the application and incorporated by reference addresses the required information relating to the ISI of Class 2 and 3 components. The results of the NRC staff's evaluation of the information incorporated by reference in the VEGP COL application are documented in NUREG-1793 and its supplements.

Section 1.2.3 of this SER provides a discussion of the strategy used by the NRC to perform one technical review for each standard issue outside the scope of the DC and use this review in evaluating subsequent COL applications. To ensure that the staff's findings on standard content that were documented in the SER with open items issued for the BLN Units 3 and 4 COL application were equally applicable to the VEGP Units 3 and 4 COL application, the staff undertook the following reviews:

- The staff compared the BLN COL FSAR, Revision 1 to the VEGP COL FSAR. In performing this comparison, the staff considered changes made to the VEGP COL FSAR (and other parts of the COL application, as applicable) resulting from RAIs and open and confirmatory items identified in the BLN SER with open items.
- The staff confirmed that all responses to RAIs identified in the corresponding standard content (the BLN SER) evaluation were endorsed.
- The staff verified that the site-specific differences were not relevant.

The staff has completed its review and found the evaluation performed for the standard content to be directly applicable to the VEGP COL application. This standard content material is identified in this SER by use of italicized, double-indented formatting. There were no confirmatory or open items related to the standard content in the BLN SER.

The following portion of this technical evaluation section is reproduced from Section 6.6.4 of the BLN SER:

AP1000 COL Information Items

- *STD COL 6.6-1*

In Section 6.6 of the NRC staff FSER (NUREG-1793, dated September 2004), the staff concluded that the AP1000 ISI program for ASME Code Class 2 and 3 components is acceptable and meets the requirements of 10 CFR 50.55a with regard to the preservice and inservice inspectability of these components. The specific version of the ASME Code, Section XI used as the baseline Code in the AP1000 certified design, is the 1998 Edition up to and including the 2000 Addenda. It should be noted that the staff did not identify any portions of the AP1000 ISI program for Class 1, 2 and 3 components that were excluded from the scope of the staff's review of the AP1000 DC (as the staff did for

inservice testing of valves in AP1000 FSER Section 3.9.6.4). Therefore, the staff's conclusions regarding the acceptability of the AP1000 ISI program based on the 1998 Edition up to and including the 2000 Addenda of the ASME Code, Section XI with regard to preservice and inservice inspectability of Class 2 and 3 components remains unchanged. The staff's evaluation of the operational program aspects of the ASME Code Class 2 and 3 ISI program is addressed with Class 1 ISI in Section 5.2.4 of this SER. The review of the COL applicant's supplemental information also includes the adequacy of the ISI program for reactor containment (Class MC). In Revision 17 of the AP1000 DCD, Class MC components were added to the DCD, Section 6.6, as being within the scope of the ISI Program. The COL applicant incorporated DCD Section 6.6 in its entirety under Revision 1 of its FSAR. Accordingly, the staff's evaluation of this section focused on the acceptability of the COL applicant's supplemental information and responses to AP1000 COL information items and action items as they relate to ISI of ASME Code Class 2, 3, and MC components.

As part of STD COL 6.6-1, the COL applicant added to the end of DCD Section 6.6.2 words to state that the initial ISI program will incorporate the latest Edition and Addenda of the ASME Code (Section XI) approved in 10 CFR 50.55a(b) on the date 12 months before initial fuel load. The COL applicant stated that successive 120-month inspection intervals must comply with the requirements of the latest Edition and Addenda of the Code incorporated by reference in 10 CFR 50.55a(b) 12 months before the start of the 120-month interval, subject to the limitations and modifications listed in 10 CFR 50.55a(b). The requirements in 10 CFR 50.55a(g) state that inservice examinations of components and system pressure tests conducted during the initial 120-month inspection interval must comply with the requirements in the latest Edition and Addenda of the Code incorporated by reference in paragraph (b) of 10 CFR 50.55a on the date 12 months before the date scheduled for initial loading of fuel under a COL under 10 CFR Part 52. The staff concludes that the supplemental information provided by the COL applicant meets the NRC's regulations and is, therefore, acceptable.

As part of STD COL 6.6-1, the COL applicant added to the end of DCD Section 6.6.1 words to state that Class 2 and 3 components are included in the equipment designation list contained in the ISI program. The requirements in 10 CFR 50.55a(g)(3)(ii) state, in part, that Class 2 and 3 components be designed and provided with access to enable the performance of ISI examinations. In addition, the inclusion of Class 2 and 3 components is consistent with the requirements of an ISI program as defined under ASME Section XI, and is, therefore, acceptable. The staff concludes that the supplemental information provided by the COL applicant meets the NRC's regulations and is, therefore, acceptable.

In Section 6.6 of the FSER (NUREG-1793), the staff identified COL Action Item 6.6-1 in which the COL applicant will prepare a PSI program and an ISI program for ASME Code, Class 2 and 3 systems, components and supports. The PSI and ISI programs will address the equipment and techniques used. As part of STD COL 6.6-1, the COL applicant describes the use of visual, surface,

ultrasonic, alternative examination techniques, and the use of automated equipment to perform the examinations. The COL applicant referenced the relevant portions of the ASME Code, Section XI to describe the nondestructive examination techniques and alternative examinations. The COL applicant also added information to describe the 120-month inspection interval as defined by IWB-2400 for Inspection Program B and the evaluation of examination results as defined by the ASME Code, Section XI, paragraphs IWC-, IWD-, IWE-, or IWF-3400 acceptance criteria. In addition, the COL applicant appropriately referenced 10 CFR 50.55a(b)(2)(xix) and IWA-2240 as described in the 1997 Addenda of the ASME Code, Section XI when applying alternative examination provisions. The supplemental information provided by the COL applicant meets the requirements in 10 CFR 50.55a, the ASME Code, Section XI, and the guidelines in RG 1.206, Section C.III.1, Chapter 6, C.I.6.6.3, and is, therefore, acceptable. Based on the discussion above, the staff concludes that the supplemental information under STD COL 6.6-1 is acceptable.

- **STD COL 6.6-2**

As part of STD COL 6.6-2, the COL applicant states that during the construction phase of the project, anomalies and construction issues are addressed using change control procedures. Modifications reviewed following DC will adhere to the same level of review as the certified design, thus, control of accessibility is maintained during post-DC activities. Control of accessibility for inspectability and testing during post-DC activities is provided via procedures for design control and plant modifications. In the NRC staff's FSER (NUREG-1793), the staff identified COL Action Item 6.6-2, which recommends COL applicants referencing the AP1000 certified design address the controls to preserve accessibility and inspectability for ASME Code, Section III, Class 2 and 3 components and piping during construction or other post-DC activities. The NRC staff reviewed the applicant's proposed resolution of COL Action Item 6.6-2 using NUREG-0800, Section 6.6. The staff finds that the accessibility needed to perform PSI/ISI examinations is maintained during the design, construction and operational phases, which satisfies NUREG-0800, Section 6.6 recommendations for accessibility. In addition, the supplemental information meets the regulations under 10 CFR 50.55a(g)(3)(ii), which requires that Class 1, 2, and 3 components be designed and provided with access that enables the performance of ISI examinations, and the requirements under ASME Code, Section XI, IWA-1500. Based on the discussion above, the staff concludes that STD COL 6.6-2 is acceptable.

Supplemental Information

- **STD SUP 6.6-1**

As part of STD SUP 6.6-1, the COL applicant added supplemental information to the AP1000 DCD, Section 6.6.2, to address accessibility of Class 2, 3, and Class MC pressure retaining components to permit preservice and inservice examinations. Factors considered, such as examination requirements,

techniques, accessibility, geometry, and material selections, are used in establishing the designs with the goals being to eliminate uninspectable components, reduce occupational radiation exposure, reduce inspection times, allow state-of-the-art inspection systems, and enhance detection and the reliability of flaw characterization.

The requirements in 10 CFR 50.55a(g)(3)(ii) state, in part, that Class 2 and 3 components be designed and provided with access to enable the performance of ISI examinations. ASME Code, Section XI, IWA-1500 requires that access be provided to enable the performance of ISI examinations, along with design considerations to render ISI practical. The staff finds that the supplemental information under STD SUP 6.6-1 meets the requirements of 10 CFR 50.55a and ASME Code, Section XI, and is, therefore, acceptable.

License Condition

- *Part 10, License Condition 6*

The COL applicant proposed a license condition for BLN for all operational programs requiring that the licensee shall submit to the appropriate Director of the NRC a schedule, no later than 12 months after issuance of the COL, that supports planning for and conduct of NRC inspections of operational programs. The schedule shall be updated every 6 months until 12 months before scheduled fuel loading, and every month thereafter until either the operational program has been implemented or the plant has been placed into commercial service. A separate license condition for PSI and ISI program implementation requirements is not necessary in the BLN COL FSAR since it is a requirement under 10 CFR 50.55a. However, submittal of the schedule for the PSI and ISI program development is necessary to plan for and conduct NRC inspections during construction. The staff finds that this schedule will enable the staff to adequately plan and schedule inspections of the PSI and ISI programs during the construction phase. This proposed license condition is consistent with the policy established in SECY-05-0197, and is acceptable.

6.6.5 Post Combined License Activities

For the reasons discussed in the technical evaluation section above, the staff proposes to include the following license condition associated with the PSI and ISI programs:

- License Condition (6-3) - The licensee shall submit to the appropriate Director of the NRO a schedule, no later than 12 months after issuance of the COL, that supports planning for and conduct of NRC inspections of the PSI and ISI programs. The schedule shall be updated every 6 months until 12 months before scheduled fuel loading, and every month thereafter until either the PSI and ISI programs have been fully implemented or the plant has been placed in commercial service, whichever comes first.

6.6.6 Conclusion

The NRC staff reviewed the application and checked the referenced DCD. The NRC staff's review confirmed that the applicant addressed the required information relating to ISI of ASME Code Class 2 and 3 components, and there is no outstanding information expected to be addressed in the VEGP COL FSAR related to this section. The results of the NRC staff's technical evaluation of the information incorporated by reference in the VEGP COL application are documented in NUREG-1793 and its supplements.

In addition, the staff concludes that the relevant information presented in the VEGP COL FSAR is acceptable and meets the requirements of GDC 45 and 10 CFR 50.55a. The staff based its conclusion on the following:

- STD COL 6.6-1 is acceptable because the staff concluded that the applicant's AP1000 ISI program for ASME Code Class 2, 3, and MC components is acceptable and meets the requirements of 10 CFR 50.55a with regard to the preservice and inservice inspectability of these components.
- STD COL 6.6-2 is acceptable because the staff concluded that the accessibility needed to perform PSI/ISI examinations is maintained during the design, construction and operational phases, and satisfies NUREG-0800, Section 6.6 acceptance criteria for accessibility.
- STD SUP 6.6-1 is acceptable because the staff concluded that accessibility to perform ISI examinations would be incorporated into the design, and satisfies the regulations under 10 CFR 50.55a(g)(3)(ii).