

# Background

- ▶ In RAI 71, NRC asked: “The applicant is requested to advise if the PRA or other design documents identify the safety significance of each important to safety SSC when subjected to an SSE so that the seismic classification can be evaluated based on the specific safety function. If this design information and list of risk-significant SSCs is in a topical report or other auditable form, reference the appropriate documents.”
- ▶ In a follow-up RAI (i.e., RAI 420), NRC asked “... the applicant’s process to apply the terms safety-related and important to safety to the classification of SSCs is considered unclear and unresolved such that additional information is needed to clarify how these terms are applied and to explain the process to develop supplemental quality requirements (special treatment) for nonsafety-related risk-significant SSCs considered important to safety to satisfy GDC 2. To comply with GDC 2 for seismic classification, further clarify how these terms are applied to satisfy GDC 2, revise the FSAR subsection 3.1.1.2.1 stated conformance to GDC 1 to replace the term “safety related” with the more comprehensive term “important to safety” and factor risk significance into quality group classification, based on the definition of the term important to safety in 10 CFR 50.”
- ▶ In RAI 435, NRC stated: “...there should be a process in place to assure that those risk-significant non-safety-related SSCs have appropriate special treatment, such as a QA program and appropriate design considerations, to ensure reliability consistent with their safety function, the D-RAP and reliability assumed in the PRA. For example, the process to apply the NS-AQ supplemented safety classification to certain SSCs should be explained so that GDC 1 is satisfied for all important to safety SSCs and not just those specifically designated as safety-related.”