

RAI 07.05-18 – Bases for Pam variables

Clarifications needed on the MHI response to RAI 07.05-18 on following items:

- Is the comparison of US-APWR PAM variables to NUREG-1431 & RG 1.97 Rev. 3 documented in any of the Technical Reports or DCD?
- It appears that US-APWR Functional Restoration Guidelines (FRGs) form the basis for most of the US-APWR PAM variables. Has this FRG been referenced or documented in the DCD?
- Where in the DCD is the compliance to 10CFR50.34(f)(2)xvii (Provide instrumentation to measure, record and readout in the control room: (A) containment pressure, (B) containment water level, (C) **containment hydrogen concentration**, (D) containment radiation intensity (high level), and (E) **noble gas effluents at all potential, accident release points**). Provide for continuous sampling of radioactive iodines and particulates in gaseous effluents from all potential accident release points, and for onsite capability to analyze and measure these samples. (II.F.1)) demonstrated? It appears that not all of the instrumentation requirements of this regulation are satisfied by the proposed US-APWR PAM variables.
- Has this proposed list of PAM variables been reviewed and accepted by the respective technical branches of the NRC? Such as, lack of “control rod position indication,” “effluent radioactivity”, “RHR HX outlet Temp”, “accumulator tank valve position”, etc. from the list of PAM variable.
- In Chapter 16, Technical Specifications, option 2 is being exercised, that is, list of PAM variables is bounding. How is this being assured? Technical Specifications are referring to Chapter 7 for the basis for PAM variables.