

CHAPTER 6  
ENGINEERED SAFETY FEATURES

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**CHAPTER 6****ENGINEERED SAFETY FEATURES****6.0 ENGINEERED SAFETY FEATURES**

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

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6.1 ENGINEERED SAFETY FEATURES MATERIALS

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

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6.1.1.2 Fabrication Requirements

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Add the following information to the end of DCD Subsection 6.1.1.2

STD COL 6.1-1

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 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 Subsection 5.2.3**.

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6.1.2.1.6 Quality Assurance Features

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Replace the third paragraph under the subsection titled "Service Level I and Service Level III Coatings" within DCD Subsection 6.1.2.1.6 with the following information.

STD COL 6.1-2

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 (**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 (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 (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.

Include a new second paragraph under the subsection titled "Service Level II Coatings" within DCD Subsection 6.1.2.1.6 with the following information.

Such 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.

Replace the second sentence of the third paragraph under the subsection titled "Service Level II Coatings" within DCD Subsection 6.1.2.1.6 with the following information.

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 (Reference 201), "Standard Guide for Use of Protective Coating Standards in Nuclear Power Plants," and the guidance of ASTM D5163 (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.

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### 6.1.3 COMBINED LICENSE INFORMATION ITEMS

#### 6.1.3.1 Procedure Review

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STD COL 6.1-1 This COL Item is addressed in Section 6.1.1.2.

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6.1.3.2 Coating Program

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STD COL 6.1-2 This COL Item is addressed in [Section 6.1.2.1.6](#).

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The following information supplements the information provided in [DCD Subsection 6.1.4](#).

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6.1.4 REFERENCES

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201. ASTM D5144-08, "Standard Guide for Use of Protective Coating Standards in Nuclear Power Plants."
202. ASTM D5163-05a, "Standard Guide for Establishing Procedures to Monitor the Performance of Coating Service Level I Coating Systems in an Operating Nuclear Power Plant."
203. ASTM D7167-05, "Standard Guide for Establishing Procedures to Monitor the Performance of Safety-Related Coating Service Level III Lining Systems in an Operating Nuclear Power Plant."



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## 6.2 CONTAINMENT SYSTEMS

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

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### 6.2.5.1 Design Basis

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Add the following information at the end of DCD subsection 6.2.5.1, as identified in Appendix A to NuStart technical report AP-TR-NS01-A, Rev. 2, "Containment Leak Rate Test Program Description."

- STD COL 6.2-1 The Containment Leak Rate Test Program using 10 CFR Part 50, Appendix J Option B is established in accordance with NEI 94-01 (**DCD Subsection 6.2.7**, Reference 30), as modified and endorsed by the NRC in Regulatory Guide 1.163. **Table 13.4-201** provides milestones for containment leak rate testing implementation.
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### 6.2.5.2.2 System Operation

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Add the following information at the end of the subsection "Scheduling and Reporting of Periodic Tests" within DCD subsection 6.2.5.2.2, as identified in Appendix A to NuStart technical report AP-TR-NS01-A, Rev. 2, "Containment Leak Rate Test Program Description." |

- STD COL 6.2-1 Schedules for the performance of periodic Type A, B, and C leak rate tests are in accordance with NEI 94-01, as endorsed and modified by Regulatory Guide 1.163, and described below: |

#### Type A Tests

A preoperational Type A test is conducted prior to initial fuel load. If initial fuel load is delayed longer than 36 months after completion of the preoperational Type A test, a second preoperational Type A test shall be performed prior to initial fuel load. The first periodic Type A test is performed within 48 months after the successful completion of the last preoperational Type A test. Periodic Type A tests are performed at a frequency of at least once per 48 months, until acceptable performance is established. The interval for testing begins at initial reactor operation. Each test interval begins upon completion of a Type A test and ends at the start of the next test. The extension of the Type A test interval is determined in accordance with NEI 94-01.

Type A testing is performed during a period of reactor shutdown at a frequency of at least once per 10 years based on acceptable performance history. Acceptable performance history is defined as successful completion of two consecutive Type A tests where the calculated performance leakage rate was less than  $1.0 L_a$ . A preoperational Type A test may be used as one of the two Type A tests that must be successfully completed to extend the test interval, provided that an engineering analysis is performed to document why a preoperational Type A test can be treated as a periodic test. Elapsed time between the first and last tests in a series of consecutive satisfactory tests used to determine performance shall be at least 24 months.

#### Type B Tests (Except Containment Airlocks)

Type B tests are performed prior to initial entry into Mode 4. Subsequent periodic Type B tests are performed at a frequency of at least once per 30 months, until acceptable performance is established. The test intervals for Type B penetrations may be increased based upon completion of two consecutive periodic as-found Type B tests where results of each test are within allowable administrative limits. Elapsed time between the first and last tests in a series of consecutive satisfactory tests used to determine performance shall be 24 months or the nominal test interval (e.g., refueling cycle) for the component prior to implementing Option B of 10 CFR Part 50, Appendix J. An extended test interval for Type B tests may be increased to a specific value in a range of frequencies from greater than once per 30 months up to a maximum of once per 120 months. The extension of specific test intervals for Type B penetrations is determined in accordance with NEI 94-01.

#### Type B Tests (Containment Airlocks)

Containment airlock(s) are tested at an internal pressure of not less than  $P_{ac}$ . (Prior to a preoperational Type A test  $P_{ac} = P_a$ .) Subsequent periodic tests are performed at a frequency of at least once per 30 months. In addition, equalizing valves, door seals, and penetrations with resilient seals (i.e., shaft seals, electrical penetrations, view port seals and other similar penetrations) that are testable, are tested at a frequency of once per 30 months.

For periods of multiple containment entries where the airlock doors are routinely used for access more frequently than once every seven days (e.g., shift or daily inspection tours of the containment), door seals may be tested once per 30 days during this time period.

Airlock door seals are tested prior to a preoperational Type A test. When containment integrity is required, airlock door seals are tested within seven days after each containment access.

#### Type C Tests

Type C tests are performed prior to initial entry into Mode 4. Subsequent periodic Type C tests are performed at a frequency of at least once per 30 months, until adequate performance has been established. Test intervals for Type C valves may

be increased based upon completion of two consecutive periodic as-found Type C tests where the result of each test is within allowable administrative limits. Elapsed time between the first and last tests in a series of consecutive passing tests used to determine performance shall be 24 months or the nominal test interval (e.g., refueling cycle) for the valve prior to implementing Option B of 10 CFR Part 50, Appendix J. Intervals for Type C testing may be increased to a specific value in a range of frequencies from 30 months up to a maximum of 60 months. Test interval extensions for Type C valves are determined in accordance with NEI 94-01.

#### Reporting

A post-outage report is prepared presenting results of the previous cycle's Type B and Type C tests, and Type A, Type B and Type C tests, if performed during that outage. The report is available on-site for NRC review. The report shows that the applicable performance criteria are met, and serves as a record that continuing performance is acceptable.

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STD COL 6.2-1 Add the following subsection at the end of DCD subsection 6.2.5.2.2, as identified in Appendix A to NuStart Technical Report AP-TR-NS01-A, Rev. 2, "Containment Leak Rate Test Program Description."

#### Acceptance Criteria

Acceptance criteria for Type A, B and C Tests are established in Technical Specification 5.5.8.

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### 6.2.6 COMBINED LICENSE INFORMATION FOR CONTAINMENT LEAK RATE TESTING

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STD COL 6.2-1 This COL item is addressed in **Subsections 6.2.5.1 and 6.2.5.2.2.**

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### 6.3 PASSIVE CORE COOLING SYSTEM

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

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#### 6.3.8 COMBINED LICENSE INFORMATION

##### 6.3.8.1 Containment Cleanliness Program

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Insert the following information at the end of DCD Subsection 6.3.8.1:

This COL Item is addressed below.

STD COL 6.3-1 Administrative procedures implement the containment cleanliness program. Implementation of the program minimizes the amount of debris left in containment following personnel entry and exits. The program is consistent with the containment cleanliness program limits discussed in **DCD Subsection 6.3.8.1**. The program includes, as a minimum, the following:

#### Responsibilities

The program defines the organizational responsibilities for implementing the program; defines personnel and material controls; and defines the inspection and reporting requirements.

#### Implementation

##### Containment Entry/Exit

- Controls to account for the quantities and types of materials introduced into the containment.
- Limits on the types and quantities of materials, including scaffolding and tools, to ensure adequate accountability controls. This may be accomplished by the work management process. Storage of aluminum is prohibited without engineering authorization. Cardboard boxes or miscellaneous packing material is not brought into containment without approval.
- If entries are made at power, prohibited materials and limits on quantities of materials that may generate hydrogen are established.
- Controls for loose items, such as keys and pens, which could be inadvertently left in containment.

- Methods and controls for securing any items and materials left unattended in containment.
- Administrative controls for accounting for tools, equipment, and other material are established.
- Administrative controls for accounting of the permanent removal of materials previously introduced into the containment.
- Limits on the types and quantities of materials, including scaffolding and tools, that may be left unattended in containment during outages and power operation. Types of materials considered are tape, labels, plastic film, and paper and cloth products.
- Requirements and actions to be taken for unaccounted for material.
- Requirements for final containment cleanliness inspections consistent with the design bases provided in **DCD Subsection 6.3.8.1**.
- Recordkeeping requirements for entry/exit logs.

#### Housekeeping

Housekeeping procedures require that work areas be maintained in a clean and orderly fashion during work activities and returned to original conditions (or better) upon completion of work.

#### Sampling Program

A sampling program is implemented consistent with NEI Guidance Report 04-07, "Pressurized Water Reactor Sump Performance Evaluation Methodology," as supplemented by the NRC in the "Safety Evaluation by The Office of Nuclear Reactor Regulation Related to NRC Generic Letter 2004-02, Nuclear Energy Institute Guidance Report (Proposed Document Number NEI 04-07), 'Pressurized Water Reactor Sump Performance Evaluation Methodology.'" Latent debris sampling is implemented before startup. The sampling is conducted after containment exit cleanliness inspections to provide reasonable assurance that the plant latent debris design bases are met. Sampling frequency and scope may be adjusted based on sampling results. Results are evaluated post-start up and any nonconforming results will be addressed in the Corrective Action Program.

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## 6.4 HABITABILITY SYSTEMS

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

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### 6.4.3 SYSTEM OPERATION

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Add the following text at the end of DCD Subsection 6.4.3:

STD COL 6.4-2 Generic Issue 83 addresses the importance of maintaining control room habitability following an accidental release of external toxic or radioactive material or smoke and the capability of the control room operators to safely control the reactor. Procedures and training for control room habitability are written in accordance with **Section 13.5** for control room operating procedures, and **Section 13.2** for operator training. The procedures and training are verified to be consistent to the intent of Generic Issue 83.

The procedures and training address the toxic chemical events addressed in **Sections 2.2** and **6.4** consistent with the guidance provided in regulatory position C.5 of Regulatory Guide 1.78, including arrangements with Federal, State, and local agencies or other cognizant organizations for the prompt notification of the nuclear power plant when accidents involving hazardous chemicals occur within five miles of the plant. The procedures include the conduct of periodic surveys of stationary and mobile sources of hazardous chemicals affecting the evaluations consistent with the guidance provided in regulatory position 2.5 of Regulatory Guide 1.196. The procedures include appropriate reviews of the configuration of the control room envelope and habitability systems consistent with the guidance provided in regulatory position 2.2.1 of Regulatory Guide 1.196. The procedures also include periodic assessments of the control room habitability systems' materiel condition, configuration controls, safety analyses, and operating and maintenance procedures consistent with the guidance provided in regulatory position 2.2.1 of Regulatory Guide 1.196.

Procedures for testing and maintenance are consistent with the design requirements of the DCD including the guidance provided in regulatory position 2.7.1 of Regulatory Guide 1.196.

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6.4.4 SYSTEM SAFETY EVALUATION

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Insert the following information at the end of the eighth paragraph of **DCD Subsection 6.4.4**.

STD COL 6.4-1 **Table 6.4-202** provides additional details regarding the evaluated onsite  
WLS COL 6.4-1 chemicals.

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Add the following subsections at the end of DCD Subsection 6.4.4.

6.4.4.1 Dual Unit Analysis

STD SUP 6.4-1 Credible events that could put the control room operators at risk from a dose standpoint at a single AP1000 unit have been evaluated and addressed in the DCD. The dose to the control room operators at an adjacent AP1000 unit due to a radiological release from another unit is bounded by the dose to control room operators on the affected unit. While it is possible that a unit may be downwind in an unfavorable location, the dose at the downwind unit would be bounded by what has already been evaluated for a single unit AP1000. Simultaneous accidents at multiple units at a common site are not considered to be a credible event.

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6.4.4.2 Toxic Chemical Habitability Analysis

WLS COL 6.4-1 Regulatory Guide 1.78 establishes the Occupational Safety and Health Association (OSHA) National Institute for Safety and Health (NIOSH) Immediately Dangerous to Life and Health (IDLH) guidelines for 30 minute exposure as the required screening criteria for airborne hazardous chemicals. Per Regulatory Guide 1.78, the NIOSH IDLH values were utilized to screen chemicals and to evaluate concentrations of hazardous chemicals to determine their effect on control room habitability.

Regulatory Guide 1.78 specifies the use of HABIT1.1 software for evaluating control room habitability. The HABIT1.1 software consists of modules that evaluate radiological and toxic chemical transport and exposure. Although HABIT1.1 software modules were not used directly, an alternative methodology based on HABIT1.1 was utilized to model toxic chemical transport and model chemical exposure to control room personnel using control room design parameters.

**Subsection 2.2.3** indicates that a release of chlorine could potentially result in elevated concentrations at the control room intake. Therefore, an analysis of chlorine concentrations inside the control room was conducted.

Chlorine is one of the most hazardous DOT approved chemicals, and was used to model a worst case DOT 2.3 release. Other chemicals that may be transported down the roadways are bounded by the properties of chlorine, and hence are precluded from further analysis.

Analyses have been performed to demonstrate that concentrations in the control room remain below the Regulatory Guide 1.78 toxicity limit for chlorine. Therefore, the implementation of control room protective measures is not required. Input values for the toxic gas analysis are summarized in [Tables 2.2-209](#) and [6.4-201](#).

[FSAR Figure 6.4-201](#) indicates the concentration of chlorine in the control room assuming no action is taken to isolate the control room envelope from outside air.

6.4.7      COMBINED LICENSE INFORMATION

STD COL 6.4-1 WLS COL 6.4-1	This COL Item is addressed in <a href="#">Subsections 2.2.3.1.1.4, 2.2.3.1.3, 2.2.3.1.4, 6.4.4, and 6.4.4.2.</a>
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STD COL 6.4-2	This COL Item is addressed in <a href="#">Subsection 6.4.3</a>
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TABLE 6.4-201  
INPUT VALUES USED IN CHEM ANALYSIS OF CHLORINE

WLS COL 6.4-1	Control Room Parameter	Value	Unit
	Control Room Volume	1011	m <sup>3</sup>
	Occupancy Factor	1	-
	Normal Mode Parameters		
	Intake Flow	0.31	m <sup>3</sup> /s

TABLE 6.4-202 (Sheet 1 of 4)  
 MAIN CONTROL ROOM HABITABILITY EVALUATIONS OF ONSITE TOXIC CHEMICALS<sup>(a)</sup>

	Evaluated Material	Evaluated State	Evaluated Maximum Quantity	Evaluated Minimum Distance to MCR Intake	Evaluated Location	MCR Habitability Impact Evaluation
A - STANDARD ONSITE TOXIC CHEMICALS						
STD COL 6.4-1	Hydrogen	Gas	500 scf	126.3 ft.	Yard at turbine building	MCR
	Hydrogen	Liquid	1,500 gal.	577 ft.	Gas storage	MCR
	Nitrogen	Liquid	3,000 gal.	577 ft.	Gas storage	MCR
	Carbon Dioxide (CO <sub>2</sub> )	Liquid	6 tons	577 ft.	Gas storage	MCR
	Oxygen Scavenger [Hydrazine]	Liquid	1,600 gal.	203 ft.	Turbine building	IH
	pH Addition [Morpholine] <sup>(b)</sup>	Liquid	1,600 gal.	203 ft.	Turbine building	IH
	Sulfuric Acid	Liquid	800 gal.	203 ft.	Turbine building	IH
	Sulfuric Acid	Liquid	20,000 gal.	436 ft.	CWS area	IH
	Sodium Hydroxide <sup>(b)</sup>	Liquid	800 gal.	203 ft.	Turbine building	S
	Sodium Hydroxide <sup>(b)</sup>	Liquid	20,000 gal.	436 ft.	CWS area	S
	Fuel Oil	Liquid	60,000 gal.	197 ft.	DG fuel oil storage tank, DG building, Annex building	IH
	Corrosion Inhibitor [Sodium Molybdate]	Liquid	800 gal.	203 ft.	Turbine building	S
	Corrosion Inhibitor [Sodium Molybdate]	Liquid	10,000 gal.	436 ft.	CWS area	S
	Scale Inhibitor [Sodium Hexametaphosphate] <sup>(b)</sup>	Liquid	800 gal.	203 ft.	Turbine building	S

TABLE 6.4-202 (Sheet 2 of 4)  
MAIN CONTROL ROOM HABITABILITY EVALUATIONS OF ONSITE TOXIC CHEMICALS<sup>(a)</sup>

Evaluated Material	Evaluated State	Evaluated Maximum Quantity	Evaluated Minimum Distance to MCR Intake	Evaluated Location	MCR Habitability Impact Evaluation
Scale Inhibitor [Sodium Hexametaphosphate] <sup>(b)</sup>	Liquid	10,000 gal.	436 ft.	CWS area	S
Biocide/Disinfectant [Sodium hypochlorite]	Liquid	800 gal.	203 ft.	Turbine building	S
Biocide/Disinfectant [Sodium hypochlorite]	Liquid	10,000 gal.	436 ft.	CWS area	S
Algaecide [Ammonium comp. polyethoxylate] <sup>(b)</sup>	Liquid	800 gal.	203 ft.	Turbine building	S
Algaecide [Ammonium comp. polyethoxylate] <sup>(b)</sup>	Liquid	10,000 gal.	436 ft.	CWS area	S
<b>B - SITE SPECIFIC ONSITE TOXIC CHEMICALS</b>					
pH Addition [60% aqueous solution of Methoxypropylamine] <sup>(c)</sup>	Liquid	330 gal.	203 ft.	Turbine building	S
pH Addition [5% aqueous solution of Dimethylamine] <sup>(c)</sup>	Liquid	330 gal.	203 ft.	Turbine building	S
Oxygen Scavenger [20% aqueous solution of Carbohydrazide] <sup>(c)</sup>	Liquid	330 gal.	203 ft.	Turbine building	S
Corrosion Inhibitor [42% aqueous solution of Sodium Bisulfite] <sup>(c)</sup>	Liquid	330 gal.	203 ft.	Turbine building	S

WLS COL 6.4-1

TABLE 6.4-202 (Sheet 3 of 4)  
 MAIN CONTROL ROOM HABITABILITY EVALUATIONS OF ONSITE TOXIC CHEMICALS<sup>(a)</sup>

Evaluated Material	Evaluated State	Evaluated Maximum Quantity	Evaluated Minimum Distance to MCR Intake	Evaluated Location	MCR Habitability Impact Evaluation
Scale Inhibitor [36% aqueous solution of Polyacrylate] <sup>(c)</sup>	Liquid	5,000 gal.	203 ft.	Turbine building	S
Biocide/Disinfectant [60% aqueous solution of Sodium Bromide] <sup>(c)</sup>	Liquid	5,000 gal.	203 ft.	Turbine building	S
Dispersant [36% aqueous solution of Polyacrylate] <sup>(c)</sup>	Liquid	Turbine building quantity bounded by evaluation of Polyacrylate for Scale Inhibitor			
pH Addition [100% aqueous solution of Sulfuric Acid]	Liquid	CWS area quantity bounded by STANDARD evaluation of Sulfuric Acid			
Sulfuric Acid [100% aqueous solution]	Liquid	CWS area quantity bounded by STANDARD evaluation of Sulfuric Acid			
Scale Inhibitor [36% aqueous solution of Polyacrylate] <sup>(c)</sup>	Liquid	5,000 gal.	436 ft.	CWS area	S
Biocide/Disinfectant [60% aqueous solution of Sodium bromide] <sup>(c)</sup>	Liquid	5,000 gal.	436 ft.	CWS area	S
Dispersant [36% aqueous solution of Polyacrylate] <sup>(c)</sup>	Liquid	CWS area quantity bounded by evaluation of Polyacrylate for Scale Inhibitor			

TABLE 6.4-202 (Sheet 4 of 4)  
MAIN CONTROL ROOM HABITABILITY EVALUATIONS OF ONSITE TOXIC CHEMICALS<sup>(a)</sup>

Evaluated Material	Evaluated State	Evaluated Maximum Quantity	Evaluated Minimum Distance to MCR Intake	Evaluated Location	MCR Habitability Impact Evaluation
Biocide/Disinfectant [6-16% aqueous solution of Sodium hypochlorite]	Liquid	CWS area quantity bounded by STANDARD evaluation of sodium hypochlorite.			
Sulfuric Acid [100% aqueous solution]	Liquid	Clarifier building quantity bounded by STANDARD evaluation of Sulfuric Acid.			
Biocide/Disinfectant [6-16% aqueous solution of Sodium hypochlorite]	Liquid	Clarifier building quantity bounded by STANDARD evaluation of sodium hypochlorite			

- STD COL 6.4-1 a) This table supplements **DCD Table 6.4-1**. Quantities are by largest evaluated container content for the evaluated location per unit. Quantities and distances are bounding evaluation values and may not be actual amounts and distances. Smaller quantities of a chemical at further distances from the MCR air intake are not shown on this table. Actual site locations are confirmed to be at or beyond the evaluated distance.
- S - Chemicals with an Impact Evaluation designation of "S" for the MCR Habitability Impact Evaluation were evaluated and screened out based on the chemical properties, distance, and quantities.
- IH - Chemicals with an Impact Evaluation designation of "IH" indicates the evaluation of this chemical considered the design detail of the main control room intake height.
- MCR - Chemicals with an Impact Evaluation designation of "MCR" indicates the evaluation of this chemical considered design details of the main control room such as volume, envelope boundaries, ventilation systems, and occupancy factor.
- WLS COL 6.4-1 b) Lee does not intend to use these standard chemicals for the water treatment function at the indicated location; alternate site specific chemicals are specified as appropriate.
- c) Screening is based on the chemical properties alone and independent of quantity and distance to the Main Control Room HVAC intake. The listed concentration is the maximum concentration evaluated. Lowering concentrations in storage or in use would decrease the hazard of the identified chemicals.

## 6.5 FISSION PRODUCT REMOVAL AND CONTROL SYSTEMS

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

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## 6.6 INSERVICE INSPECTION OF CLASS 2, 3, AND MC COMPONENTS

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

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Add the following to DCD Section 6.6 ahead of Subsection 6.6.1 heading:

- STD COL 6.6-1 The initial inservice inspection program incorporates the latest edition and addenda of the ASME Boiler and Pressure Vessel Code approved in 10 CFR 50.55a(b) on the date 12 months before initial fuel load. Inservice examination of components and system pressure tests conducted during 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 inspection interval (or the optional ASME Code cases listed in Regulatory Guide 1.147, that are incorporated by reference in 10 CFR 50.55a(b), subject to the limitations and modifications listed in 10 CFR 50.55a(b)).
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### 6.6.1 COMPONENTS SUBJECT TO EXAMINATION

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Add the following to the end of DCD Subsection 6.6.1:

- STD COL 6.6-1 Class 2 and 3 components are included in the equipment designation list and the line designation list contained in the inservice inspection program.
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### 6.6.2 ACCESSIBILITY

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Revise the first and last sentences of the third paragraph in DCD Subsection 6.6.2 to add supplemental information as follows:

- STD SUP 6.6-1 Considerable experience has been drawn on in designing, locating, and supporting Quality Group B and C (ASME Class 2 and 3) and Class MC pressure-retaining components to permit pre-service and inservice inspection required by Section XI of the ASME Code. Factors such as examination requirements, examination techniques, accessibility, component geometry, and material selections are used in establishing the designs. The inspection design goals are 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. There are no Quality Group B

and C components or Class MC components, which require inservice inspection during reactor operation.

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Add the following to the end of DCD Subsection 6.6.2:

- STD COL 6.6-2 During the construction phase of the project, anomalies and construction issues are addressed using change control procedures. Modifications reviewed following design certification adhere to the same level of review as the certified design per 10 CFR Part 50, Appendix B as implemented by the Westinghouse Quality Management System (QMS). The QMS requires that changes to approved design documents, including field changes, are subject to the same review and approval process as the original design. This explicitly requires the field change process to follow the same level of review that was required during the design process. Accessibility and inspectability are key components of the design process.

Control of accessibility for inspectability and testing during post-design certification activities is provided via procedures for design control and plant modifications.

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### 6.6.3 EXAMINATION TECHNIQUES AND PROCEDURES

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Add the following Subsections 6.6.3.1, 6.6.3.2 and 6.6.3.3 to the end of DCD Subsection 6.6.3:

#### 6.6.3.1 Examination Methods

##### **Visual Examination**

- STD COL 6.6-1 Visual examination methods VT-1, VT-2 and VT-3 are conducted in accordance with ASME Section XI, IWA-2210. In addition, VT-2 examinations meet the requirements of IWA-5240.

Where direct visual VT-1 examinations are conducted without the use of mirrors or with other viewing aids, clearance is provided in accordance with Table IWA-2210-1.

##### **Surface Examination**

Magnetic particle, liquid penetrant, and eddy current examination techniques are performed in accordance with ASME Section XI, IWA-2221, IWA-2222, and IWA-2223 respectively. Direct examination access for magnetic particle (MT) and liquid penetrant (PT) examination is the same as that required for direct visual (VT-1) examination (see Visual Examination), except that additional access is provided as necessary to enable physical contact with the item in order to perform



the examination. Remote MT and PT generally are not appropriate as a standard examination process; however, boroscopes and mirrors can be used at close range to improve the angle of vision.

### **Ultrasonic Examination**

Volumetric ultrasonic direct examination is performed in accordance with ASME Section XI, IWA-2232, which references mandatory Appendix I.

### **Alternative Examination Techniques**

As provided by ASME Section XI, IWA-2240, alternative examination methods, a combination of methods, or newly developed techniques may be substituted for the methods specified for a given item in this section, provided that they are demonstrated to be equivalent or superior to the specified method. This provision allows for the use of newly developed examination methods, techniques, etc., which may result in improvements in examination reliability and reductions in personnel exposure. In accordance with 10 CFR 50.55a(b)(2)(xix), IWA-2240 as written in the 1997 Addenda of ASME Section XI must be used when applying these provisions.

#### **6.6.3.2 Qualification of Personnel and Examination Systems for Ultrasonic Examination**

STD COL 6.6-1 Personnel performing examinations shall be qualified in accordance with ASME Section XI, Appendix VII. Ultrasonic examination systems shall be qualified in accordance with industry accepted programs for implementation of ASME Section XI, Appendix VIII.

#### **6.6.3.3 Relief Requests**

STD COL 6.6-1 The specific areas where the applicable ASME Code requirements cannot be met are identified after the examinations are performed. Should relief requests be required, they will be developed through the regulatory process and submitted to the NRC for approval in accordance with 10 CFR 50.55a(a)(3) or 50.55a(g)(5). The relief requests include appropriate justifications and proposed alternative inspection methods.

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### **6.6.4 INSPECTION INTERVALS**

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Add the following to the end of DCD Subsection 6.6.4:

STD COL 6.6-1 Because 10 CFR 50.55a(g)(4) requires 120-month inspection intervals, Inspection Program B of IWB-2400 must be chosen. The inspection interval is divided into three periods. Period one comprises the first three years of the interval, period two comprises the next four years of the interval, and period three comprises the

remaining three years of the inspection interval. The periods within each inspection interval may be extended by as much as one year to permit inspections to be concurrent with plant outages. The adjustment of period end dates shall not alter the rules and requirements for scheduling inspection intervals. It is intended that inservice examinations be performed during normal plant outages, such as refueling shutdown or maintenance shutdowns occurring during the inspection interval.

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#### 6.6.6 EVALUATION OF EXAMINATION RESULTS

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Add the following new paragraph at the end of DCD Subsection 6.6.6:

- STD COL 6.6-1 Components containing flaws or relevant conditions and accepted for continued service in accordance with the requirements of IWC-3122.3 or IWC-3132.3 for Class 2 components, IWD-3000 for Class 3 components, IWE-3122.3 for Class MC components, or IWF-3112.2 or IWF-3122.2 for component supports, are subjected to successive period examinations in accordance with the requirements of IWC-2420, IWD-2420, IWE-2420, or IWF-2420, respectively. Examinations that reveal flaws or relevant conditions exceeding Table IWC-3410-1, IWD-3000, IWE-3000, or IWF-3400 acceptance standards are extended to include additional examinations in accordance with the requirements of IWC-2430, IWD-2430, or IWF-2430, respectively.

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#### 6.6.9 COMBINED LICENSE INFORMATION ITEMS

##### 6.6.9.1 Inspection Programs

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- STD COL 6.6-1 This COL Item is addressed in **Section 6.6** introduction, and in **Subsections 6.6.1, 6.6.3.1, 6.6.3.2, 6.6.3.3, 6.6.4, and 6.6.6.**

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##### 6.6.9.2 Construction Activities

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- STD COL 6.6-2 This COL Item is addressed in **Subsection 6.6.2.**
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APPENDIX 6A  
FISSION PRODUCT DISTRIBUTION IN THE AP1000 POST-DESIGN BASIS  
ACCIDENT CONTAINMENT ATMOSPHERE

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