



NEI 96-07, Appendix C

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Brief History of NEI 96-07, Appendix C

- NEI submitted to NRC in October 2010
- NRC comments received May 2011
- NEI submitted amended section on “Evaluation of Tier 2 Departures that Affect Ex-Vessel Severe Accident (EVSA) Design Features”
- NRC comments received September 2011
- NEI submitted Rev. 0C to NRC 10/31/11



Overview of NEI 96-07, App C, Rev 0C

- Significantly re-formatted/re-arranged
 - “delta document” with references to the main body of NEI 96-07, Revision 1
- Includes new guidance for:
 - evaluating departures affecting EVSA design features (Sec. 4.4.2.3)
 - changes to Chapter 19 (Sec. 4.4.3)
 - changes during construction (Sec. 4.7.1)
- Incorporated NRC comments to date



Changes to Chapter 19

- Design basis information
- PRA information
- Information related to EVSA
- Other information related to severe accidents



Revised Section 4.4.2.2 Examples

- Reflect dose in terms of total effective dose equivalent (TEDE) rather than thyroid and whole body dose
- Same examples, just modified dose and regulatory limits




For Further Discussion

- Acceptability of the use of NEI 98-03, Revision 1, *Guidelines for Updating Final Safety Analysis Reports*, for the plant-specific DCD;
 - NEI 96-07, App. C, Section 1.2.3: COL licensees may apply NEI 98-03, Revision 1, guidance to the plant-specific DCD information




For Further Discussion cont.

- Acceptability of the use of other more specific regulations for changes otherwise subject to Section VIII.B.5 of the design certification rules as is currently allowed for changes otherwise subject to 10 CFR 50.59 per 10 CFR 50.59(c)(4);
 - NEI 96-07, App. C, Sections 4.1 and 4.2: use of other more specific change regulations is acceptable




For Further Discussion cont.

- Equivalence of departure Summary Report content required by Section X.B.1 to that currently provided by licensees per 10 CFR 50.59(d)(2);
 - NEI 96-07, App. C, Section 5.3: report changes/departures that received a full VIII.B.5 Evaluation, did not require prior NRC approval, and have been implemented




For Further Discussion cont.

- The appropriate review process for the initial issuance of design documents and procedures by licensees;
 - NEI 96-07, App. C, Section 3.4: initial issuance of these documents during construction does not constitute a change or departure and does not require review under 10 CFR 52.98 change processes




For Further Discussion cont.

- Change processes applicable to operational requirements after the COL is issued;
 - NEI 96-07, App. C, Sections 3.15 and 4.3.5: after issuance of a COL, operational requirements in an FSAR are governed by 10 CFR 50.59, whether or not the FSAR has incorporated by reference the operational requirements from the generic DCD



For Further Discussion cont.

- Feasibility of additional guidance on administrative Tier 1 departures without a LAR/exemption;
 - Not currently addressed in NEI 96-07, Appendix C.
 - Is it possible to correct administrative errors in Tier 1 information without a LAR?



For Further Discussion cont.

- The role of configuration management versus change control processes during construction.
 - Not currently addressed in NEI 96-07, Appendix C.
 - NEI will add proposed guidance on changes during construction applicability and the change during construction process (new Sec. 4.1.1)

