

# DRAFT for Comment

## DESIGN SPECIFIC REVIEW STANDARD

### FOR mPOWER™ iPWRs

#### 3.4.2 PROTECTION OF STRUCTURES AGAINST FLOOD FROM EXTERNAL SOURCES

##### REVIEW RESPONSIBILITIES

**Primary** - Organization responsible for structural analysis reviews

**Secondary** - None

##### I. AREAS OF REVIEW

All structures, systems, and components (SSCs) important to safety are to be protected against flood from external sources to ensure compliance with 10 CFR 50, Appendix A, General Design Criterion (GDC) 2 requirements. All safety-related and risk-significant SSCs are subject to flood protection from external sources. An SSC may be classified as:

- Safety-related risk-significant
- Safety-related nonrisk-significant
- Nonsafety-related risk-significant
- Nonsafety-related non-risk significant

If the SSC belongs in one of the first three classifications above, the review described in this Design-Specific Review Standard (DSRS) Section 3.4.2 is applied. For the purpose of brevity in this section, the first three categories above will be designated as “safety-related or risk-significant”.

The following areas are related to the design of seismic Category I structures to withstand the effects of the highest flood level from external sources including tsunami and groundwater level specified for the plant. These areas are reviewed to ensure conformance with 10 CFR Part 50, Appendix A, General Design Criterion (GDC) 2.

The specific areas of review are as follows:

1. The data of the highest flood, tsunami and groundwater levels are provided. Appropriate loading to account for flood, tsunami and groundwater on seismic Category I structures are established. Further, for plants where the flood level is higher than the proposed grade around the plant structures, the dynamic phenomena associated with flooding and tsunami such as currents, flood waves, and their hydrodynamic effects, are considered. The bases for these parameters are reviewed by organization responsible for review of hydrology related issues in conformance with relevant subsections of iPWR Design Specific Review Standard (DSRS) Section 2.4.

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2. The analysis procedures that are utilized to transform the static and dynamic effects of the highest flood level, probable maximum tsunami, and highest groundwater level into effective loads applied to seismic Category I structures are reviewed.
3. Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC). For design certification (DC) and combined license (COL) reviews, the staff reviews the applicant's proposed ITAAC associated with the structures, systems, and components (SSCs) related to this iPWR DSRS section in accordance with iPWR DSRS Section 14.3, "Inspections, Tests, Analyses, and Acceptance Criteria." The staff recognizes that the review of ITAAC cannot be completed until after the rest of this portion of the application has been reviewed against acceptance criteria contained in this iPWR DSRS section. Furthermore, the staff reviews the ITAAC to ensure that all SSCs in this area of review are identified and addressed as appropriate in accordance with iPWR DSRS Section 14.3.
4. COL Action Items and Certification Requirements and Restrictions. For a DC application, the review will also address COL action items and requirements and restrictions (e.g., interface requirements and site parameters).

For a COL application referencing a DC, a COL applicant must address COL action items (referred to as COL license information in certain DCs) included in the referenced DC. Additionally, a COL applicant must address requirements and restrictions (e.g., interface requirements and site parameters) included in the referenced DC.

An applicant for a standard design certification may postulate values for site parameters as a basis for plant design.

## Review Interfaces

Other iPWR DSRS sections interface with this section as follows.

1. The flood related data to determine the design basis external flood and the dynamic effects on structures of the flood where it is above the plant grade is reviewed in accordance with iPWR DSRS Section 2.4.2, and 2.4.3.
2. The probable maximum tsunami data to determine the design basis tsunamigenic sources, tsunami wave propagations, static and dynamic hydraulic forces, debris and water-borne projectiles, and other site-related effects (e.g., site specific terrain and topography) on structures is reviewed in accordance with iPWR DSRS Section 2.4.6.
3. The data related to groundwater to determine the highest groundwater level is reviewed in accordance with iPWR DSRS Section 2.4.12.
4. The coordination and the review of site parameters postulated for design in a standard design certification application are conducted in accordance with iPWR DSRS Section 2.0.

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5. The specific acceptance criteria and review procedures are contained in the referenced iPWR DSRS sections.
6. Review of the description and results of the Probabilistic Risk Assessment is performed under SRP 19.0.

## II. ACCEPTANCE CRITERIA

### Requirements

Acceptance criteria are based on meeting the relevant requirements of the following Commission regulations:

1. GDC 2 requires that SSCs important to safety shall be designed to withstand the effects of natural phenomena such as earthquakes, tornados, hurricanes, floods, tsunami, and seiches without loss of capability to perform their safety functions as it relates to natural phenomena. The design bases for these SSCs shall reflect appropriate combinations of the effects of normal and accident conditions with the effects of the natural phenomena.
2. 10 CFR 52.47(b)(1), which requires that a DC application contain the proposed inspections, tests, analyses, and acceptance criteria (ITAAC) that are necessary and sufficient to provide reasonable assurance that, if the inspections, tests, and analyses are performed and the acceptance criteria met, a facility that incorporates the design certification has been constructed and will operate in conformity with the design certification, the provisions of the Atomic Energy Act, and the NRC's regulations;
3. 10 CFR 52.80(a), which requires that a COL application contain 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 combined license, the provisions of the Atomic Energy Act, and the NRC's regulations.

### iPWR DSRS Acceptance Criteria

Specific DSRS acceptance criteria acceptable to meet the relevant requirements of the NRC's regulations identified above are as follows for the review described in this DSRS section. The DSRS is not a substitute for the NRC's regulations, and compliance with it is not required. However, an applicant is required to identify differences between the design features, analytical techniques, and procedural measures proposed for its facility and the DSRS acceptance criteria and evaluate how the proposed alternatives to the DSRS acceptance criteria provide acceptable methods of compliance with the NRC regulations.

The design of a structure that must withstand the effects of the highest flood, maximum

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probable tsunami, and highest groundwater levels is acceptable if the relevant requirements of GDC 2, "Design Bases for Protection against Natural Phenomena," are complied with. The criteria necessary to meet the relevant requirements of GDC 2 are as follows:

1. The highest flood, maximum probable tsunami, and highest groundwater levels and the associated static and dynamic effects, if any, used in the design shall be the most severe ones that have been historically reported for the site and surrounding area, with sufficient margin for the limited accuracy, quantity, and period of time in which the historical data have been accumulated.
2. In most situations, the highest flood level is below the proposed plant grade and only its hydrostatic effects need be considered. Unless the hydrostatic head associated with the highest flood and groundwater levels is relieved by utilizing drainage or a pumping system around the foundations of structures, hydrostatic pressure has to be considered as a structural load on basement walls and the foundation slab of a structure. In consideration of any uplifting or floating of a structure, the total buoyancy force may be based on the highest flood level or the highest groundwater level excluding wave action. However, wave action should be included in the calculation for lateral and overturning movements of a structure.
3. Where the flood level is above the proposed plant grade, the dynamic loads of wave action should be considered. Procedures for determining such dynamic loads are acceptable if they are in accordance with or equivalent to those delineated in the U.S. Army Coastal Engineering Research Center, "Shore Protection Manual" (Vol. I, June 2002, reprinted from 1973 edition and Vol. II, June 2002, reprinted from 1973 edition), in EM 1110-2-1100, Coastal Engineering Manual, Part II, Chapter 1, "Water Wave Mechanics," U.S. Army Corps of Engineers, April 30, 2002, or in FEMA 55, "Coastal Construction Manual," Federal Emergency Management Agency, Jessup, MD, 2005, as applicable.

Any other methods proposed should be provided with adequate justification and are reviewed on a case by case basis.

## Technical Rationale

The technical rationale for application of these acceptance criteria to the areas of review addressed by this iPWR DSRS section is discussed in the following paragraphs:

1. GDC 2 requires that structures important to safety shall be designed to withstand the effects of natural phenomena such as floods, tsunamis, and seiches without loss of capability to perform their safety function. GDC 2 also requires that the design basis for these SSCs shall reflect appropriate consideration of the most severe of the natural phenomena that has been historically reported for the site and surrounding area, with sufficient margin for the limited accuracy. This includes that the effects of the highest groundwater condition need to be considered.

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This iPWR DSRS guides the review of analysis procedures for the determination of static and dynamic loadings due to natural flooding phenomena. These loadings are to be used in the design of SSCs important to safety in order to ensure their capability to withstand flood effects without loss of their safety functions.

Meeting this requirement provides a level of assurance that plant structures are constructed in such a manner as to withstand stresses resulting from the most severe flooding condition they may experience.

2. Programmatic requirements. Commission regulations and policy mandate a number of specific “programs” applicable to certain SSCs; however, these programs are not considered applicable to the evaluation of the DSRS Section 3.4.2 components.

## III. REVIEW PROCEDURES

These review procedures are based on the identified DSRS acceptance criteria. For deviations from these acceptance criteria, the staff should review the applicant’s evaluation of how the proposed alternatives provide an acceptable method of complying with the relevant NRC requirements identified in Subsection II.

The site-related and hydrodynamic parameters described in subsection II.1 of this iPWR DSRS section are reviewed by staff in accordance with DSRS Sections 2.4.2, 2.4.3, 2.4.6 and 2.4.12.

1. After the acceptability of the site-related and hydrodynamic parameters is established, the reviewer proceeds with the review of the structural aspects of the design for flood, tsunami or groundwater. The procedures used by the applicant to determine effective flood and groundwater loads are reviewed by staff responsible for the review of structures in accordance with subsection II of this DSRS section.
2. For review of a DC application, the reviewer should follow the above procedures to verify that the design, including requirements and restrictions (e.g., interface requirements and site parameters), set forth in the final safety analysis report (FSAR) meets the acceptance criteria. The reviewer should also consider the appropriateness of identified COL action items. The reviewer may identify additional COL action items; however, to ensure these COL action items are addressed during a COL application, they should be added to the DC FSAR.

For review of a COL application, the scope of the review is dependent on whether the COL applicant references a DC, an early site permit (ESP) or other NRC approvals (e.g., manufacturing license, site suitability report or topical report).

For review of both DC and COL applications, DSRS Section 14.3 should be followed for the review of ITAAC. The review of ITAAC cannot be completed until after the completion of this section.

## IV. EVALUATION FINDINGS

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The reviewer verifies that the applicant has provided sufficient information and that the review and calculations (if applicable) support conclusions of the following type to be included in the staff's safety evaluation report. The reviewer also states the bases for those conclusions.

The staff concludes that the plant design is acceptable and meets the requirements of GDC 2. This conclusion is based on the following:

The applicant has met the requirements of GDC 2 with respect to the structures' capability to withstand the effects of the highest flood, probable maximum tsunami and highest groundwater levels so that their design reflects

1. appropriate consideration for the most severe flood recorded for the site with an appropriate margin,
2. appropriate combination of the effects of normal and accident conditions with the effect of the natural phenomena, and
3. the importance of the safety functions to be performed.

The applicant has designed the plant structures with sufficient margin to prevent structural damage for the most severe flood and groundwater levels for the site and used appropriate dynamic effects for structural design, in accordance with U.S. Army Coastal Engineering Research Center, "Shore Protection Manual" (Vol. I, June 2002, reprinted from 1973 edition and Vol. II, June 2002, reprinted from 1973 edition) or in EM 1110-2-1100, Coastal Engineering Manual, Part II, Chapter 1, "Water Wave Mechanics," U.S. Army Corps of Engineers, April 30, 2002 or in FEMA 55, "Coastal Construction Manual," Federal Emergency Management Agency, Jessup, MD, 2005, as applicable, so that the requirements of Item 1 listed above are met. In addition, the design of seismic Category I structures, as required by Item 2 listed above, has included load combinations of the most severe flood or groundwater-related loads and the loads resulting from normal and accident conditions.

The procedures used to determine the loadings on seismic Category I structures induced by the highest design flood, probable maximum tsunami or highest groundwater levels specified for the plant site are acceptable since these procedures have been used in the design of conventional structures and proven to provide an adequate basis which together with other engineering design considerations assures that the structures will withstand such environmental forces.

The use of these procedures provides reasonable assurance that, in the event of floods, tsunami or high groundwater, the structural integrity of the plant seismic Category I structures will not be impaired and, in consequence, safety related systems and components located within these structures will be adequately protected and may be expected to perform necessary safety functions, as required, thus satisfying the requirement of item 3 listed above

For an application referencing a certified plant design, the reviewer's finding should

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include a concluding statement similar to the following:

Historical data for the proposed site are consistent with the flood level identified in the site parameter envelope specified in the certified plant design documents.

For DC and COL reviews, the findings will also summarize the staff's evaluation of requirements and restrictions (e.g., interface requirements and site parameters) and COL action items relevant to this DSRS section.

In addition, to the extent that the review is not discussed in other SER sections, the findings will summarize the staff's evaluation of the ITAAC, including design acceptance criteria, as applicable

## V. IMPLEMENTATION

The staff will use this DSRS section in performing safety evaluations of mPower™-specific design certification (DC), combined license (COL), or early site permit (ESP) applications submitted by applicants pursuant to 10 CFR Part 52. The staff will use the method described herein to evaluate conformance with Commission regulations.

Because of the numerous design differences between the mPower™ and large light-water nuclear reactor power plants, and in accordance with the direction given by the Commission in SRM- COMGBJ-10-0004/COMGEA-10-0001, "Use of Risk Insights to Enhance the Safety Focus of Small Modular Reactor Reviews," dated August 31, 2010 (ML102510405), to develop risk-informed licensing review plans for each of the small modular reactor (SMR) reviews including the associated pre-application activities, the staff has developed the content of this DSRS section as an alternative method for mPower™ -specific DC, COL, or ESP applications submitted pursuant to 10 CFR Part 52 to comply with 10 CFR 52.47(a)(9), "Contents of applications; technical information."

This regulation states, in part, that the application must contain "an evaluation of the standard plant design against the Standard Review Plan (SRP) revision in effect 6 months before the docket date of the application." The content of this DSRS section has been accepted as an alternative method for complying with 10 CFR 52.47(a)(9) as long as the mPower™ DCD FSAR does not deviate significantly from the design assumptions made by the NRC staff while preparing this DSRS section. The application must identify and describe all differences between the standard plant design and this DSRS section, and discuss how the proposed alternative provides an acceptable method of complying with the regulations that underlie the DSRS acceptance criteria. If the design assumptions in the DC application deviate significantly from the DSRS, the staff will use the SRP as specified in 10 CFR 52.47 (a)(9). Alternatively, the staff may revise the DSRS section in order to address new design assumptions. The same approach may be used to meet the requirements of 10 CFR 52.17 (a)(1)(xii) and 10 CFR 52.79 (a)(41), for ESP and COL applications, respectively.

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## VI. REFERENCES

1. 10 CFR Part 50, Appendix A, General Design Criterion 2, "Design Bases for Protection against Natural Phenomena."
2. U.S. Army Coastal Engineering Research Center, "Shore Protection Manual," Volume I. Vicksburg, MS. June 2002, reprinted from 1973 edition.
3. U.S. Army Corps of Engineers. Coastal Engineering Manual, Part II, Chapter 1, "Water Wave Mechanics," EM 1110-2-1100. Washington, DC. April 30, 2002.
4. U.S. Army Coastal Engineering Research Center, "Shore Protection Manual," Vol. II. Vicksburg, MS. June 2002, reprinted from 1973 edition.
5. Federal Emergency Management Agency, "Coastal Construction Manual," Report Number 55, Jessup, MD., 2005.