

RADB received
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Gallagher, Carol

From: Wheeler, Larry
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Please find one comment related to the draft SRP 19.5, AIA.

Review for Design Features for Core Cooling

There is no discussion in this SRP or referenced NEI 07-13 R/8 related to maintaining the core subcritical post AIA event. For example for a PWR that operates with a borated core, all control rods in may not maintain the core subcritical (shutdown margin) as the reactor coolant system cools down.

Boration is used to compensate for fuel burning during the core cycle and at the end of core life the boron concentration is near 0 PPM (zero) as opposed to ~1300 PPM at the beginning of core life.

Key design features may need to include several borated source such as the refueling water storage tanks (RWST) to maintain the core subcritical thus maintaining the core cooled.

Since the BWRs do not operated with a borated core, this is not applicable.

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SUNSI Review Complete
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