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Ms. Cindy Bladey
Chief, Rules, Announcements, and Directives Branch (RADB)
Office of Administration,
Mail Stop: TWB-05-B01M
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: COMMENTS ON DRAFT STANDARD REVIEW PLAN (SRP) 19.5

Dear Ms. Bladey:

ERIN appreciates the opportunity to provide the U.S. Nuclear Regulatory Commission with comments on the subject draft SRP entitled, "Adequacy of Design Features and Functional Capabilities Identified and Described for Withstanding Aircraft Impacts." ERIN has been involved in the development of NEI 07-13, "Methodology for Performing Aircraft Impact Assessments for New Plant Designs" which has been endorsed by the NRC in Regulatory Guide 1.217 as a methodology for conducting aircraft impact assessments AIAs.

ERIN uses NEI 07-13 daily in conducting aircraft impact assessments for new plant designs. It is hoped that these comments will clarify the SRP and ensure its consistency with NEI 07-13.

ERIN's comments follow.

1. Section III.8 of the draft SRP states in part,

An intervening structure having the following features to be able to protect a building wall from aircraft impact:

C. The structure has multiple interior walls in the flight path that are made of reinforced concrete

ERIN's recommendation is to delete the word "interior" from item C. Because NEI 07-13, Revision 8 states,

Only reinforced concrete walls that are at least 18" thick are considered to provide screening protection. An intervening structure can only be credited if N (see SGI Appendix A) walls, including the minimum 24" thick exterior wall of the structure

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containing the safe shutdown equipment of concern, are encountered in the projected flight path of the aircraft. Other structures may be acceptable but their acceptability needs to be verified by a structural analysis.

Without the deletion of "Interior," the SRP could be interpreted to state that the **N** walls are counted inside the intervening structure (multiple interior walls of the intervening structure); however, NEI 07-13 states that the walls (interior or exterior) of the intervening structure are counted in the **N** number of walls as long as they are 1) a minimum of 18" of reinforced concrete and 2) the exterior walls of the "structure containing the safe shutdown equipment of concern" is a minimum of 24" of reinforced concrete.

2. In Section III.9.B the draft SRP states, "Floor, ceiling and wall plugs installed to fill open penetrations that are fire-rated for at least 3-hours; and will withstand any over pressure."

ERIN's recommendation is to replace "any" with "5-psid." This is consistent with NEI 07-13, Revision 8.

3. In Section III.9, paragraph "Review of Design Features for Core Cooling" of the draft SRP states, "The AIA reviewer shall examine the description provided by the applicant and confirm that it describes all equipment in the heat removal path."

ERIN's recommendation is to replace "all equipment" with "or references descriptions of the key design features and functional capabilities of."

It is unreasonable to describe "all" equipment in the heat removal path in Section 19.5. The applicant should identify the key design features and functional capabilities with references to other sections for further descriptions.

4. In Section III.9 and the same paragraph as comment #3 above, the draft SRP states, "The AIA reviewer also shall determine if the features credited for core cooling are designed to accomplish this function with the reactor critical and producing power."

ERIN's recommendation is to delete this sentence. NEI 07-13 states in Table 3-4 that the initial condition for AIA is that the reactor is scrammed from full power. Thus the reactor is assumed to be shutdown for the assessment.

5. In Section III.9, paragraph entitled, "Review of Design Features for Maintaining the Containment Intact" the same "all" is used for "all equipment" as in comment 3 above.

6. In Section III.9, paragraph entitled, "Review of design Features for Maintaining Spent Fuel Pool Integrity" in sub-item (1) the draft SRP states, "...designed such that there will be no leakage from the pool following impact of the aircraft..."

ERIN's recommendation is to replace "from the pool" with "through the spent fuel pool liner below the required minimum level of the pool." This will make this statement consistent with Section III.6 of the draft SRP and with NEI 07-13, Revision 8.

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7. In Section III, paragraph entitled, "Review of Design for Spent Fuel Pool Cooling" the draft SRP uses the term "all." ERIN's recommendation is the same as described in comment #3 above.

Sincerely,



R. A. Hill
Senior Consultant

/rah

cc: Doug True, ERIN
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