



## Inquiry Form – NRC Submittal

record no value for the APM with a corresponding note in the "comments" section that an engineering analysis is necessary to determine the maximum APM the wall can withstand before a functional failure; or (3) reference the existing FSAR section or design document that supports the APM.

Note that this notation should be made in the response to Q11, Q23, or Q27 of the Walkdown Record Form, as applicable.

### **For walkdowns that have been completed:**

Recognizing that it is not resource effective to revise completed paperwork, it is not necessary to change the way the APM was recorded in completed portions of the Walkdown Record Form. In these cases, APMs that have been recorded as simple measurements of height differences are acceptable as long as the APM determination process did not result in overlooking some potential small margins, as defined by the site per Section 5.8 of NEI 12-07.

#### Notes:

1. Typically, the CLB for the site will indicate what the probable maximum flood level is and the level to which the SSC important to safety is protected. If the recorded APM exceeds the difference between these two values and the margin is to be credited for additional flood protection, the margin must be justified by one of the following methods:
  - a. Documented application of reasonable and independently verified engineering judgment
  - b. Performance of new engineering analysis
  - c. Reference to an existing document or analysis that supports the higher protection level

Revision: 3                      Date: 8/27/12

### **E. NRC Review:**

Not Necessary \_\_\_\_\_                      Necessary   X    
Explanation: \_\_\_\_\_

### **F. Industry Approval:**

Documentation Method: \_\_\_\_\_                      Date: \_\_\_\_\_

### **G. NRC Acceptance:**

Interpretation \_\_\_\_\_                      Agency Position \_\_\_\_\_

Documentation Method: \_\_\_\_\_                      Date: \_\_\_\_\_