



U.S. NUCLEAR REGULATORY COMMISSION
STANDARD REVIEW PLAN

**19.5 ADEQUACY OF DESIGN FEATURES AND FUNCTIONAL CAPABILITIES
IDENTIFIED AND DESCRIBED FOR WITHSTANDING AIRCRAFT IMPACTS**

REVIEW RESPONSIBILITIES

Primary- Organization responsible for the review of fire protection
Organization responsible for the review of structures
Organization responsible for the review of reactor systems

Secondary- Organization responsible for the review of spent fuel cooling
Organization responsible for the review of balance of plant systems

I. AREA OF REVIEW

Title 10 of the *Code of Federal Regulations* (10 CFR) 50.150, the aircraft impact assessment (AIA) rule applies to the following new reactor applicants: (1) construction permit applications after July 13, 2009; (2) operating license applications for which a construction permit was issued after July 13, 2009; (3) standard design certification applications; (4) standard design certification rule renewal applications for standard design certification rules in effect on July 13, 2009, which have not been amended to comply with the AIA rule; (5) standard design approval applications; (6) combined license (COL) applications that either (a) do not reference a standard design

Revision 0 – April 2013

USNRC STANDARD REVIEW PLAN

This Standard Review Plan (SRP), NUREG-0800, has been prepared to establish criteria that the U.S. Nuclear Regulatory Commission (NRC) staff responsible for the review of applications to construct and operate nuclear power plants intends to use in evaluating whether an applicant/licensee meets the NRC regulations. The SRP is not a substitute for the NRC 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 SRP acceptance criteria and evaluate how the proposed alternatives to the SRP acceptance criteria provide an acceptable method of complying with the NRC regulations.

The SRP sections are numbered in accordance with corresponding sections in Regulatory Guide (RG) 1.70, "Standard Format and Content of Safety Analysis Reports for Nuclear Power Plants (LWR Edition)." Not all sections of RG 1.70 have a corresponding review plan section. The SRP sections applicable to a combined license application for a new light-water reactor (LWR) are based on RG 1.206, "Combined License Applications for Nuclear Power Plants (LWR Edition)."

These documents are made available to the public as part of the NRC policy to inform the nuclear industry and the general public of regulatory procedures and policies. Individual sections of NUREG-0800 will be revised periodically, as appropriate, to accommodate comments and to reflect new information and experience. Comments may be submitted electronically by email to NRR_SRP@nrc.gov

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certification, standard design approval, or manufactured reactor, or (b) reference a standard design certification issued before July 13, 2009, which has not been amended to address the AIA rule; and (7) manufacturing license applications that either (a) do not reference a standard design certification or standard design approval, or (b) reference a standard design certification issued before July 13, 2009, which has not been amended to comply with the AIA rule.

Using realistic analyses, applicants shall identify and incorporate into the design those design features and functional capabilities to show, with reduced use of operator action, that the reactor core remains cooled or the containment remains intact and spent fuel cooling or spent fuel pool integrity is maintained (the acceptance criteria). For some cases, when the damage could impair the ability of the reactor operator to scram the reactor, the applicants should assess the potential for damage to prevent a scram and confirm that design features are in place to protect equipment relied upon for reactor scram. Applicants are required to describe how such design features and functional capabilities meet the acceptance criteria of the rule. The impact of a large commercial aircraft is a beyond-design-basis event. Consequently, the NRC requirements that apply to the design, construction, testing, operation, and maintenance of design features and functional capabilities for design basis events do not apply to design features or functional capabilities selected by the applicant solely to meet the requirements of the AIA rule. The objective of the AIA rule is to require nuclear power plant designers to perform a rigorous assessment of the design to identify design features and functional capabilities that could provide additional inherent protection to withstand the effects of a large commercial aircraft impact (i.e., meet the rule's acceptance criteria with reduced use of operator actions).

Applicants may identify either safety-related or non-safety-related features or capabilities to satisfy the AIA rule. There is no requirement that the features or capabilities identified solely for complying with the AIA rule be classified as safety-related. The design features relied upon to satisfy the AIA rule may be structures or features: (1) whose sole purpose is to address the requirements of the AIA rule, or (2) designed to have a dual purpose of addressing the requirements of the AIA rule, as well as other NRC requirements (safety, security, etc).

Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC): For standard design certification, manufacturing license, and COL reviews, the staff reviews the applicant's proposed ITAAC associated with the structures, systems, and components identified in the assessment required by the AIA rule in accordance with Standard Review Plan (SRP) Section 14.3, "Inspections, Tests, Analyses, and Acceptance Criteria." The staff recognizes that the review of ITAAC cannot be completed until the portion of the application addressing the AIA rule has been reviewed against acceptance criteria contained in this SRP section.

Combined License Action Items, Standard Design Certification and Standard Design Approval Requirements and Restrictions: For a standard design certification or standard design approval 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 standard design certification or standard design approval, a COL applicant must address COL action items (referred to as COL information in certain standard design certifications) included in the referenced standard design certification or standard design approval. Additionally, a COL applicant must address requirements and restrictions (e.g., interface requirements and site parameters) included in the referenced standard design certification or standard design approval.

II. ACCEPTANCE CRITERIA

Requirements

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

1. 10 CFR 50.150(a)(1) requires that each applicant perform a design-specific assessment of the effects on the facility of the impact of a large commercial aircraft. Using realistic analysis, the applicant shall identify and incorporate into the design those design features and functional capabilities to show that, with reduced use of operator actions: (1) the reactor core remains cooled, or the containment remains intact; and (2) spent fuel cooling or spent fuel pool integrity is maintained.
2. 10 CFR 50.150(b) requires that the applicant must include a description of (1) the design features and functional capabilities identified in 10 CFR 50.150 (a) (1), and (2) how the design features and functional capabilities identified in 10 CFR 50.150 (a) (1) meet the assessment requirements in 10 CFR 50.150 (a) (1).
3. 10 CFR 52.47(b)(1), requires that a standard design certification application contain the proposed inspections, tests, and analysis 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, a plant that incorporates the standard design certification has been constructed and will be operated in accordance with the standard design certification, the provisions of the Atomic Energy Act, and the NRC regulations.
4. 10 CFR 52.80(a), 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 be operated in conformity with the COL, the provisions of the Atomic Energy Act, and the NRC regulations.
5. 10 CFR 52.158(a)(1) requires that a manufacturing license application contain the proposed inspections, tests, and analyses that the licensee who will be operating the reactor 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: (1) the reactor has been manufactured in conformity with the manufacturing license; the provisions of the Atomic Energy Act, and the Commission's rules and regulations; and (2) the manufactured reactor will be operated in conformity with the approved design and any license authorizing operation of the manufactured reactor.

Standard Review Plan Acceptance Criteria

Specific SRP acceptance criteria acceptable to meet the relevant requirements of the NRC regulations identified above are as follows for the review described in this SRP section. The

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1. Regulatory Guide (RG) 1.217, Revision 0, "Guidance for the Assessment of Beyond-Design-Basis Aircraft Impacts," endorses the guidance in Nuclear Energy Institute (NEI) 07-13, Revision 8, "Methodology for Performing Aircraft Impact Assessments for New Plant Designs," (ref. 3) as an acceptable method for use in satisfying the NRC requirements in 10 CFR 50.150(a) regarding the assessment of aircraft impacts for new nuclear power reactors.

The NRC will review the information contained in the application and reach conclusions as to whether the applicant has: (1) adequately described design features and functional capabilities in accordance with the AIA rule; and (2) conducted an assessment reasonably formulated to identify design features and functional capabilities to show, with reduced use of operator action, that the facility can withstand the effects of a large commercial aircraft impact.¹

III. REVIEW PROCEDURES

For the purpose of evaluating whether or not the above criteria have been met, the staff shall consider:

1. An AIA performed by qualified personnel (see Item III.2 below) using a method that conforms to the guidance in NEI 07-13, Revision 8, to be a method which is reasonably formulated to identify design features and functional capabilities to show, with reduced use of operator action, that the facility can withstand the effects of a large commercial aircraft impact, and thereby meets the requirements of 10 CFR 50.150(a).
2. Qualified personnel to be: (1) the designer of the facility for which the AIA applies; and/or (2) an applicant's primary contractor for the AIA who has also designed a nuclear power reactor facility either already licensed by the NRC or currently under review by the NRC.
3. Use of operator action to be reduced when (1) all necessary actions to control the nuclear facility can be performed in the control room, or at an alternate station containing equipment specifically designed for control purposes, and (2) a reduced amount of active operator intervention, if any, is required to meet the assessment criteria in 10 CFR 50.150(a)(1). Reduction in the use of operator action is measured relative to the

¹ Consideration of Aircraft Impacts for New Nuclear Power Reactors, 74 FR 28120 (June 12, 2009).

actions required to address aircraft impact without the AIA rule in place (e.g., similar actions contained in operational programs in place at current operating reactor sites).²

4. The design features or functional capabilities that provide reactor core cooling or spent fuel pool cooling criterion to be satisfied if the design features or functional capabilities have been included in the design of the plant to perform that cooling function and can be operated with reduced use of operator action (i.e., they are not features that serve a different function in the design but could be used in an ad hoc fashion to perform the cooling function).
5. The “intact containment structure” criterion to be satisfied if the containment: (1) will not be perforated by the impact of a large, commercial aircraft used for long distance flights in the United States, with aviation fuel loading typically used in such flights, and an impact speed and angle of impact considering the ability of both experienced and inexperienced pilots to control large, commercial aircraft at the low altitude representative of a nuclear power plant’s low profile and, (2) maintains ultimate pressure capability, given a core damage event, until effective mitigation strategies can be implemented. Effective mitigation strategies are those that provide, for an indefinite period of time, sufficient cooling to the damaged core or containment to limit temperature and pressure challenges below the ultimate pressure capability of the containment as defined in Chapter 19 of the design certification document or Final Safety Analysis Report (FSAR), as applicable.
6. The “spent fuel pool integrity maintained” criterion to be satisfied if the impact of a large commercial aircraft on the spent fuel pool wall or support structures does not result in leakage through the spent fuel pool liner below the required minimum water level of the pool.
7. The exterior wall of a structure to be unable to prevent penetration of the aircraft into the structure unless an analysis of an already existing design verifies that penetration is prevented, or the wall is specifically designed to prevent such penetration.
8. An intervening structure having all of the following features to be able to protect a building wall from aircraft impact:
 - A. The location of the structure is fixed and not subject to plant-specific location changes without re-verifying that the AIA rule is satisfied.
 - B. The exterior walls of the structure are made of reinforced concrete.
 - C. Interior walls in the flight path are made of reinforced concrete.

² Each design feature and functional capability incorporated into the design does not have to involve reduced use of operator actions; the overall reduction in use of operator actions must be judged for the complete set of design features and functional capabilities identified by the applicant to show that the acceptance criteria have been met. In this context, “operator action” includes actions of operators in the control room or at alternative control panels or control areas to control the reactor and the nuclear facility. This means that active operator intervention and initiation of responsive action to maintain core cooling or an intact containment, and spent fuel cooling or spent fuel pool integrity should be reduced. The designer need not strive to achieve the absolute minimum in operator action. In some cases, there may be countervailing considerations that weigh against reducing to the absolute minimum the use of operator action to show that the acceptance criteria are met.

- D. The height, width and location of the intervening structure relative to the building wall being protected satisfy criteria in Sections 3.2.2.1 and 3.2.2.2 of NEI 07-13, Revision 8.
9. The following design features used together to be capable of limiting the spread of a jet fuel fire caused by the crash of a large commercial aircraft:
- A. Two standard listed 3-hour fire-rated doors in series or one 3-hour fire-rated door rated at greater than 5 pounds per square inch differential (psid) (e.g. watertight door).
 - B. Floor, ceiling and wall plugs installed to fill open penetrations that are fire-rated for at least 3-hours; and will withstand 5 psid over pressure.
 - C. Boundary walls enclosing the fire damage footprint that are fire-rated for at least 3-hours and have masonry construction to ensure overpressure survival.

The Statement of Considerations for the AIA rule regarding consideration of aircraft impacts for new nuclear power reactors³ states that: “The NRC decision on an application subject to 10 CFR 50.150 will be separate from any NRC determination that may be made with respect to the adequacy of the impact assessment which the rule does not require be submitted to the NRC.” Since the AIA is not submitted to the NRC for its review, the staff shall conduct its review to determine whether or not descriptions of the design features and functional capabilities are complete enough such that, assuming the design features and functional capabilities perform their intended functions, there is reasonable assurance that the acceptance criteria in 10 CFR 50.150(a)(1) can be met. The Staff reviewers will not make any determinations of adverse impacts the AIA features may have on the rest of the plant design and operations. Other reviewers under other SRP sections will make this determination.

Reasonably Formulated Aircraft Impact Assessment

The Staff reviewer shall examine the summary description of the AIA and use review procedures III.1 and III.2 of this SRP to determine if it has been reasonably formulated.

Review of Design Features for Core Cooling

The Staff reviewer shall consider the design features credited by the applicant for core cooling, including front line systems and support systems. As part of core cooling, front line systems, support systems, and borated water may be required to maintain the core with sufficient shutdown margin. The Staff reviewer shall examine the description provided by the applicant and confirm that it describes or references descriptions of the key design features and functional capabilities of all equipment credited in the heat removal path. Features shall be provided that are capable of removing heat immediately following shutdown from full power operation and when the plant is shutdown with the reactor in a cold shutdown (non-flooded) condition with a large vent in the primary system. The Staff reviewer shall apply review procedure III.4 of this SRP. The Staff reviewer should not attempt to verify whether or not design features for core cooling satisfy core

³ Consideration of Aircraft Impacts for New Nuclear Power Reactors, 74 FR 28120 (June 12, 2009).

cooling success criteria for beyond design-basis events (documented in the probabilistic risk assessment). The adequacy of the design features to fulfill these protective functions is subject to Staff inspection.

Using information provided by the applicant, the Staff reviewer shall determine if the features identified are designed to cool the reactor core in the presence of a breach of the reactor coolant system. If not, the Staff reviewer shall initiate a review, as described below, to confirm that design features or functional capabilities that protect the reactor coolant system pressure boundary from structural damage have been identified and described in the application.

In most cases, operators are expected to have some warning prior to damage so a reactor scram would be expected to occur prior to damage. However in other cases, damage could impair the ability of the reactor to scram. An assessment will be made of the potential for damage to prevent a scram should it have not previously occurred. The Staff reviewer shall initiate a review to confirm that design features are in place to protect equipment relied upon for reactor scram.

The Staff reviewer shall consider the design features credited by the applicant for protection of core cooling design features from structural damage caused by the impact of a large commercial aircraft. Based on the applicant's description of the location of equipment credited for core cooling, including necessary support systems, the Staff reviewer shall confirm that the applicant has identified design features or functional capabilities that protect these locations. Based on the applicant's descriptions of design features or functional capabilities, the Staff reviewer shall confirm that they satisfy review procedures III.5, III.7 and III.8 of this SRP. The Staff reviewer shall ensure that the applicant has addressed all potential impact locations around the perimeter of the structure housing the protected core cooling design features. The Staff reviewer shall confirm that equipment credited for core cooling, including support systems, are not attached to the walls or ceiling of any structure credited as a protective barrier. The adequacy of the design features in protecting equipment from structural and shock damage should not be evaluated by the Staff reviewer. The adequacy of the design features to fulfill these protective functions is subject to Staff inspection.

The Staff reviewer shall consider design features credited for the purpose of protecting core cooling design features from fire damage caused by the dispersal of jet fuel following an aircraft impact. Based on the applicant's description of the location of equipment credited for core cooling, including necessary support systems, the Staff reviewer shall confirm that the applicant has identified design features or functional capabilities that keep fire from spreading to these locations. Based on the applicant's descriptions of design features or functional capabilities, the Staff reviewer shall confirm that they satisfy review procedure III.9 of this SRP. The adequacy of the design features in protecting equipment from fire damage should not be evaluated by the Staff reviewer. The adequacy of the design features to fulfill these protective functions is subject to Staff inspection.

Review of Design Features for Maintaining the Containment Intact

If the applicant has not identified design features or functional capabilities to maintain core cooling under all aircraft impact scenarios, the Staff reviewer shall confirm that the applicant has identified design features or functional capabilities for maintaining an intact containment, i.e., that satisfy review procedure III.5 of this SRP. The Staff reviewer shall verify that the applicant has credited

the containment structure as a feature specifically designed such that it will not be perforated by the impact of a large commercial aircraft. The applicant's assessment of the ability of the containment to withstand perforation is not required to be submitted for review by the NRC. However, it is subject to inspection by the NRC staff. The Staff reviewer shall examine the description provided by the applicant of features relied upon to maintain the containment intact following a core damage event and confirm that it describes or references descriptions of the key design features and functional capabilities of all credited equipment needed to maintain ultimate pressure capability until effective mitigation strategies can be implemented. The adequacy of the design features for maintaining an intact containment should not be evaluated by the Staff reviewer. The adequacy of the design features to fulfill these protective functions is subject to Staff inspection. The Staff reviewer shall examine the description of any associated mitigating strategy for assuring indefinite containment heat removal, if required, and confirm that all actions necessary to accomplish heat removal have been described. The ability of operators to carry out this strategy with procedures, including the timing of such actions, should not be evaluated by the Staff reviewer. The ability of operators to carry out this strategy is subject to Staff inspection of the aircraft impact assessment, and also subject to review and inspection by the staff in accordance with the requirements in paragraphs 10 CFR 50.54(hh)(2) and 10 CFR 52.80(d) of the Commission's regulations, respectively.

Review of Design Features for Maintaining Spent Fuel Pool Integrity

The Staff reviewer shall examine the applicant's description of design features or functional capabilities for maintaining spent fuel integrity and confirm that either: (1) the applicant has stated that the walls, liner and the support structure for the fuel pool are designed such that there will be no leakage through the spent fuel pool liner below the required minimum water level of the pool following impact of a large commercial aircraft, or (2) the applicant has identified sufficient intervening structures to protect the pool walls and support structure which meet review procedure III.6 of this SRP. The adequacy of the design features for maintaining spent fuel pool integrity should not be evaluated by the Staff reviewer. The adequacy of the design features to fulfill these protective functions is subject to Staff inspection.

Review of Design Features for Spent Fuel Pool Cooling

If the applicant has not identified design features or functional capabilities to maintain spent fuel pool integrity, the Staff reviewer shall consider design features credited by the applicant for the purpose of maintaining adequate spent fuel pool cooling and confirm that they have been specifically designed to provide pool water make-up capability and the capability to spray water on fuel that is not submerged. The adequacy of the design features for providing adequate spent fuel pool cooling should not be evaluated by the Staff reviewer. The adequacy of the design features to fulfill these protective functions is subject to Staff inspection.

The Staff reviewer shall consider design features credited by the applicant for protecting the design features needed to provide adequate spent fuel pool cooling from structural damage caused by the impact of a large commercial aircraft. Based on the applicant's description of the location of equipment credited for spent fuel pool cooling, including necessary support systems, the Staff reviewer shall confirm that design features or functional capabilities have been identified that protect these locations. Based on the applicant's descriptions of design features or functional capabilities, the Staff reviewer shall confirm that they satisfy review procedures III.5,

III.7, III.8, and III.9 of this SRP. The Staff reviewer shall ensure that the applicant has addressed all potential impact locations around the perimeter of the structure housing the protected spent fuel pool cooling design features. The Staff reviewer shall confirm that equipment credited for spent fuel pool cooling is not attached to the walls or ceiling of any structure credited as a protective barrier. The adequacy of the design features in protecting equipment from structural and shock damage should not be evaluated by the Staff reviewer. The adequacy of the design features to fulfill these protective functions is subject to Staff inspection.

Review of the Use of Reduced Operator Action

In regards to meeting review procedure III.3, Staff reviewers should be cognizant of the fact that the designer need not achieve the absolute minimum in operator action. The NRC recognizes that there may be countervailing considerations that weigh against reducing to the absolute minimum the use of operator action to show that the acceptance criteria in the AIA rule are met. The designer shall identify and consider in a reasonable process the goal of incorporating design features and functional capabilities which achieve the acceptance criteria in paragraph (a)(1)(i) and (ii) of 10 CFR 50.150 with reduced use of operator action.

For review of a standard design certification, standard design approval, or manufacturing license application, the reviewer should follow the above procedures to verify that the design set forth in the FSAR meets the acceptance criteria. Standard design certifications have referred to the FSAR as the design control document. 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 FSAR.

For review of a COL application, the scope of the review is dependent on whether the COL applicant references a standard design certification, standard design approval, manufacturing license, or other NRC approvals (e.g., a topical report).

For review of standard design certification, manufacturing license, or COL applications, SRP 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

The reviewer verifies and concludes that the preliminary safety analysis report or final safety analysis report, as applicable, has provided sufficient information and that the review supports conclusions of the following type to be included in the staff's Safety Evaluation Report (SER). The reviewer also states the basis for those conclusions.

Reviewers shall confirm that the evaluation supports the following conclusions, to be included in the staff's SER.

- The applicant has adequately described the design features and functional capabilities identified for inclusion in the design and how they show that the facility can withstand the effects of a large commercial aircraft impact, namely that:

- (i) the reactor core remains cooled or the containment remains intact; and
 - (ii) spent fuel pool cooling or spent fuel pool integrity is maintained.
- The applicant has performed an AIA reasonably formulated to identify design features and functional capabilities to show, with reduced use of operator action, that the acceptance criteria in the AIA rule are met.

For standard design certification, standard design approvals, and manufacturing license reviews, the findings will also summarize the staff's evaluation of the COL action/information items proposed by the applicant that are relevant to this SRP section.

For combined licensee reviews, the findings will also summarize the staff's evaluation of how the COL applicant addressed those COL action/information items included in the design certification document referenced in its application that are relevant to this SRP 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 SRP section in performing safety evaluations of license applications, standard design certifications and standard design approvals submitted by applicants pursuant to 10 CFR Part 50 or 10 CFR Part 52. Except when the applicant proposes an acceptable alternative method for complying with specified portions of the Commission's regulations, the staff will use the method described herein to evaluate conformance with Commission regulations.

The provisions of this SRP section apply to reviews of applications submitted six months or more after the date of issuance of this SRP section, unless superseded by a later revision.

VI. REFERENCES

1. 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities."
2. 10 CFR Part 52, "Licenses, Certifications, and Approvals for Nuclear Power Plants."
3. NEI 07-13, "Methodology for Performing Aircraft Impact Assessments for New Plant Designs", Revision 8, Nuclear Energy Institute, April 2011. (ML111440006)
4. RG 1.217, Revision 0, "Guidance for the Assessment of Beyond-Design-Basis Aircraft Impacts."

Paperwork Reduction Act Statement

The information collections contained in the Standard Review Plan are covered by the requirements of 10 CFR Part 50 and 10 CFR Part 52, and were approved by the Office of Management and Budget, approval numbers 3150-0011 and 3150-0151.

Public Protection Notification

The NRC may not conduct or sponsor, and a person is not required to respond to, a request for information or an information collection requirement unless the requesting document displays a currently valid OMB control number.

SRP Section 19.5
“Adequacy of Design Features and Functional Capabilities
Identified and Described for Withstanding Aircraft Impacts”
Description of Changes

Section 19.5 is a new SRP section not previously included in NUREG-0800. It was developed to provide guidance for adequacy of design features and functional capabilities identified from the Aircraft Impact Assessment.