

Draft SRP 19.3 Summary of Public Comments and NRC Disposition

No. Topic	Summary Disposition	ID	Title	Source
1 Availability Controls	AGREE	54	Apply availability controls only if appropriate with R/A mission	NEI
2 Augmented Design Standards	AGREE	27	Augmented design standards not consistent with Callan memo	DMoses
3 Availability Controls	AGREE	62	Availability controls should only be applied if appropriate for the RTNSSR/A mission	NEI
4 RTNSS Criterion C	AGREE	42	Clarify Acceptance Criteria related to non-safety SSCs that cause initiating events	NEI
5 Cold Shutdown	AGREE	36	Clarify definition of Safe stable shutdown condition	NEI
6 Cold Shutdown	AGREE	10	Clarify definition of Safe stable shutdown condition	GmP
7 Cold Shutdown	AGREE	25	Clarify single failure requirement for means to achieve cold shutdown	GEH
8 RTNSS Criterion D	AGREE	18	Correct CCFP typographical error ( .10 not 10)	GmP
9 Appendix A	AGREE	64	Correct errors in descriptions of SRPs in Appendix A	NEI
10 Appendix A	AGREE	19	Correct reference to SRP 5.7.4	GmP
11 Appendix A	AGREE	20	Correct Reference to SRP 7.8	GmP
12 RTNSS Criterion D	AGREE	26	Correct typographical error in CCFP	GEH
13 Consistency with SECY papers	AGREE	13	Delete Requirement for protection of RTNSS B SSCs from Tornado winds	GmP
14 Consistency with SECY papers	AGREE	49	Delete Requirement for protection of RTNSS B SSCs FROM Tornado winds	NEI
15 RTNSS Criterion B	AGREE	15	Delete the requirement that non-safety related systems have redundant trains and be designed against assumed single failures	GmP
16 Design review of RTNSS SSCs	AGREE	43	Design related review should be limited to functions related to risk significant R/A missions	NEI
17 Augmented Design Standards	AGREE	28	DSRS do not refer to requirements for augmented design standards in SRP19.3	DMoses
18 Consistency with SECY papers	AGREE	32	Dynamic qualification of RTNSS SSCs should not be required.	NEI
19 Consistency with SECY papers	AGREE	9	Dynamic qualification of RTNSS SSCs should not be required.	GmP
20 Consistency with SECY papers	AGREE	63	Evaluation findings should adopt/reflect the SECY language	NEI
21 RTNSS Criterion C	AGREE	55	Main and support RTNSS SSCs should be in same RTNSS category	NEI
22 RTNSS Criterion C	AGREE	16	Main and support SSCs should be in same RTNSS category	GmP
23 Availability Controls	AGREE	53	Only put controls in ACM when they are important to achieving R/A mission	NEI
24 Augmented Design Standards	AGREE	38	Post 72-hour equipment only needs to be Seismic category II	NEI

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25	R/A mission	AGREE	33	Restrict review of SSC functions to R/A mission	NEI
26	Consistency with SECY papers	AGREE	52	Revise characterizaion of "reliable"SSC	NEI
27	Augmented Design Standards	AGREE	12	Revise SRP 19.3 to permit replenishment of consumables after 7 days	Gmp
28	RTNSS Criterion B	AGREE	40	Revised text describng acceptance criterion for RTNSS B equipment	NEI
29	Consistency with SECY papers	AGREE	24	SRP 19.3 reflects RTNSS review for ESBWR	GEH
30	Cold Shutdown	AGREE	35	Taking plant Cold Shutdown not a RTNSS requirement	NEI
31	RTNSS Criterion D	AGREE	6	Typographical error on limit for conditional containment failure probability	NuScale
32	RTNSS Criterion D	AGREE	60	Typographical error on NRC criteria for conditional containment failure probability	NEI
33	Augmented Design Standards	AGREE	47	Use of mobile equipment for RTNSS B functions	NEI
34	Augmented Design Standards	AGREE WITH COMMENTS	5	Clarify time period in which only onsite equipment and supplies are credited	NuScale
35	Augmented Design Standards	AGREE WITH COMMENTS	48	Seismic design of RTNSS "B"SSCs	NEI
36	Focused PRA	AGREE WITH COMMENTS	2	SRP does not describe scope of focused PRA	NuScale
37	Focused PRA	AGREE WITH COMMENTS	3	Usage of LRF and LERF should be made consistent with Option 2C of SECY-12-0081.	NuScale
38	Focused PRA	AGREE WITH COMMENTS	1	Usage of LRF and LERF should be made consistent with Option 2C of SECY-12-0081.	NuScale
39	Focused PRA	AGREE WITH COMMENTS	7	Usage of LRF and LERF should be made consistent with Option 2C of SECY-12-0081.	NuScale
40	Appendix A	AGREE WITH COMMENTS	31	Use of SRPs other than 19.3 for RTNSS review expands RTNSS requirements	NEI
41	Appendix A	AGREE WITH COMMENTS	8	Use of SRPs other than 19.3 for RTNSS review expands RTNSS requirements	Gmp
42	Availability Controls	DISAGREE	29	All availability controls should be TS	DMoses
43	RTNSS Criterion A	DISAGREE	56	Delete RTNSS criterion "A"	NEI
44	RTNSS Criterion B	DISAGREE	57	Delete RTNSS Criterion "B"	NEI
45	RTNSS Criterion C	DISAGREE	59	Delete uncertainly evaluation portion of RTNSS "C" scoping criterion	NEI
46	RTNSS Criterion C	DISAGREE	17	Don't include SSCs in RTNSS Category C based on contribution to IE frequencies	Gmp
47	RTNSS Criterion C	DISAGREE	58	Don't include SSCs in RTNSS Category C based on contribution to IE frequency	NEI
48	Consistency with DSRS	DISAGREE	23	DSRS establish new augmented design standard for RTNSS SSCs	SNL
49	Availability Controls	DISAGREE	37	Remove the 10 CFR 50.36(c)(2)(ii)(D) requirement from SRP	NEI
50	Availability Controls	DISAGREE	61	Remove the 10 CFR 50.36(c)(2)(ii)(D) requirement from SRP	NEI

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51	Consistency with SECY papers	DISAGREE	45	Review of design to assure it can meet functional requirements necessary to meet R/A mission outside RTNSS policy	NEI
52	Consistency with SECY papers	DISAGREE	44	Review of human actions necessary for design to work as intended is outside RTNSS policy	NEI
53	RTNSS Criterion B	DISAGREE	30	Separate the post-72 hour criteria and the seismic criteria on SRP page 19.3-3.	NEI
54	Augmented Design Standards	DISAGREE	46	Use of on-site and offsite equipment and supplies for RTNSS B functions	NEI
55	Consistency with SECY papers	NEED CLARIFICATION	34	All RTNSS SSCs do not require protection from seismic and natural hazards	NEI
56	RTNSS Criterion B	NEED CLARIFICATION	41	Clarify length of post-72 hour period	NEI
57	RTNSS Criterion B	NEED CLARIFICATION	11	Clarify length of post-72 hour period	GmP
58	Consistency with SECY papers	NEED CLARIFICATION	14	Revise requirements for protection of RTNSS SSCs against internal hazards	GmP
59	Consistency with SECY papers	NEED CLARIFICATION	50	Revise requirements for protection of RTNSS SSCs against internal hazards	NEI
60	Consistency with DSRs	NEED CLARIFICATION	4	Treatment of functional requirements for RTNSS SSCs	NuScale
61	Appendix A	QUESTION ANSWERED	21	Reference other chapter 9 SRPs in Appendix A	GmP
62	Augmented Design Standards	QUESTION ANSWERED	22	Why no augmented design stds. for RTNSS A, C, D and E SSCs	SNL
63	Augmented Design Standards	UNDECIDED	39	No regulatory basis for GDC-2 requirement	NEI
64	Augmented Design Standards	UNDECIDED	51	RTNSS SSCs do not need to meet GDC-2	NEI