

## ArevaEPRDCPEm Resource

**From:** Buckberg, Perry  
**Sent:** Thursday, May 09, 2013 9:53 AM  
**To:** WILLIFORD Dennis (AREVA)  
**Cc:** Snyder, Amy; Miernicki, Michael  
**Subject:** Resend - FSAR Rev 4 Tier 1 Section 3.9 change

Dennis,

The last change expected to Tier I Section 3.9, ITAAC 2.1 (interim version of FSAR Rev 4 shown below) was as a result of RAI 464 Q#14.03.03-50. FSAR Rev 4 changes to this ITAAC ITAAC were not expected. The three staff comments below are based on the FSAR Rev 4 version of this ITAAC.

- In item a., Under the Inspection, Test, Analysis (ITA) column, it says. "Type tests or analyses or a combination of tests and analyses will be performed on non-Seismic Category I SSC located within a potential impact zone of a Seismic Category I SSC using analytical assumptions, or under conditions, which bound the Seismic **Category II** design requirements."

According to FSAR Section 3.7.3.8, Revision 4, where seismic design requirements are imposed on a non-Seismic Category I SSC, they are Seismic **Category I** design requirements. The non-Seismic Category I system is then classified as Seismic Category II. There are no Seismic Category II design requirements, therefore the last part of this sentence should read ".....which bound Seismic **Category I** design requirements."

- The Acceptance Criteria (AC) for item a. says, "Test/analysis reports conclude that non-Seismic Category I SSC located within a potential impact zone of a Seismic Category I SSC can withstand seismic design basis loads without impairing the ability of SC I SSC to perform their safety function(s)."

Withstanding seismic design loads is not the same thing as being designed to Seismic Category I design requirements. Further, the words without impairing are confusing and un-necessary.

- The ITAAC does not address impact issue (FSAR 3.7.3.8, item 2), which under FSAR Section 3.7.3.8 is acceptable albeit with a number of caveats.

		CW	ITA	AC
3.9	2.1	M01 3.9 2.1 Non-Seismic Category I SSC located within a potential impact zone of a Seismic Category I SSC will not impair the ability of <del>the</del> Seismic Category I SSC to perform their <del>intended</del> safety function(s).	a. Type tests, analyses, or a combination of type tests and analyses will be performed on non-Seismic Category I SSC located within a potential impact zone of a Seismic Category I SSC using analytical assumptions, or under conditions, which bound the Seismic Category II design requirements. b. An inspection will be performed of the as-built non-Seismic Category I SSC located within a	a. Test/analysis reports conclude that non-Seismic Category I SSC located within a potential impact zone of a Seismic Category I SSC can withstand seismic design basis loads without impairing the ability of <del>the</del> Seismic Category I SSC to perform their <del>intended</del> safety function(s). b. Inspection reports conclude that non-Seismic Category I SSC located within a potential

			<p>potential impact zone of a Seismic Category I SSC verify that non-Seismic Category I SSC, including anchorage, are installed <del>per the approved design requirements</del> in a condition bounded by the tested or analyzed condition.</p>	<p>impact zone of a Seismic Category I SSC, including anchorage, are installed <del>per the approved design requirements</del> in a condition bounded by the tested or analyzed condition.</p>
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Thanks,

**PERRY BUCKBERG**

**Senior Project Manager**

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**Created By:** Perry.Buckberg@nrc.gov

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