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Subject: APM Determinations - FAQ 030
Date: Friday, August 30, 2013 3:44:30 PM
Attachments: [FAQ 030 - Determining Available Physical Margin rev 0.doc](#)

Chris, Ed;

As we have been discussing, the FFTF has developed a FAQ to address your observations on APM determinations during the flooding walkdown. FAQ 030 is attached. You will note that FAQ 030 does not address your suggestion that the NRC needs written, versus verbal, closure. I have informed the FFTF of your comment, but the task force has not had a chance to talk about it yet. We will be discussing your comment during our pre-meeting next week.

I would like to review the agenda for next Thursday when you have a chance. Some folks will be calling in for the discussion on our IA concerns white paper and I would like to accommodate their availability.

Thanks,

Jim Riley

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FAQ 030: Determining Available Physical Margin

A. TOPIC: Determining Available Physical Margin

Source document: NEI 12-07

Section: 3.13 and 5.8

B. DESCRIPTION:

During their flooding design basis walkdowns, the NRC observed that licensees did not always determine and document available physical margin (APM) in a consistent manner that met the expected interpretation of NEI 12-07 (design basis walkdown guidance document). The NRC is concerned that this finding may be widespread within the nuclear fleet.

Provide additional guidance on how APM should be determined and recorded and how resolution of the issue can be communicated to the NRC.

C. Initiator:

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Date: 8/27/13

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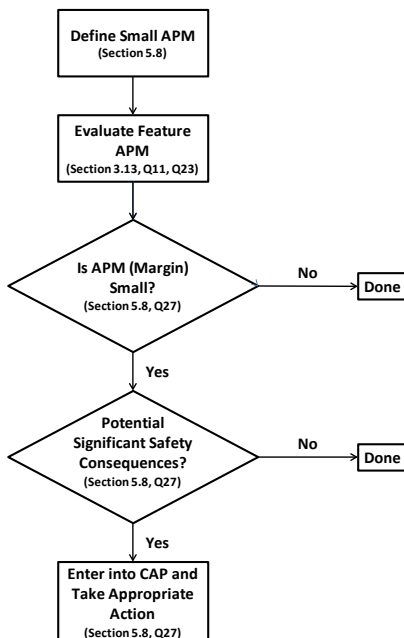
D. RESOLUTION: (Include additional pages if necessary. Total pages: 2)

Inquiry number: 030

Priority: H

APM Determination

Available physical margin is defined in section 3.13 of NEI 12-07. The process for obtaining and evaluating APM is described in section 5.8. The flow chart below and accompanying description provides additional information.



- NEI 12-07 does not require that a numerical threshold value for “small” APM be defined for each site, but doing so establishes a consistent basis for determining what instances need to be entered into the CAP. The implementation of the guidance in this FAQ requires that each site determine a value or values for “small APM”.
- A numerical value for APM should be determined for every applicable flood protection feature (e.g., wall, penetration, berm, door). In accordance with FAQ 006, this would normally be a simple number reflecting the difference between the design basis flood height at the location and the point at which the function of the flood protection feature is compromised (e.g., the top of a barrier or the height of the first unsealed penetration) and the resulting flood can affect a SSC important to safety.
- For simplicity, the APM for seals (e.g., flood doors, penetrations, flood gates, etc.) in a barrier can be assumed to be the same as the APM for the barrier in which they are located. Seal ratings may also be used if desired but is not required.

- If a numerical APM value is not determined (e.g. ‘N/A’ or something similar was entered in response to Q11, Q23, and/or Q27 on the walkdown record forms), an explanation should be provided describing why this is appropriate.
- “Large” APMs representing adequate margin should be treated in accordance with FAQ 006.
- If the APM number for a location is smaller than the “small APM” value defined for that location and an

