

HCVS Guidance Inquiry Form

A. TOPIC: _____ HCVS Dedicated Equipment _____

Inq. No.: HCVS-02

Source document: EA-13-109 / NEI 13-02

Sections: EA-13-109, Element 1.2.6, NEI 13-02 Sec 4.1.2, 4.2.1.1, 4.2.6.1.2,

B. DESCRIPTION:

What is the meaning of "Dedicated" in order element 1.2.6, "**Order Reference: 1.2.6** – The HCVS shall be capable of operating **with dedicated and permanently installed equipment for at least 24 hours** following the loss of normal power or loss of normal pneumatic supplies to air operated components during an extended loss of AC power."?

This FAQ does not address "dedicated" motive force which is addressed in white paper HCVS-WP-01

C. PROPOSED ANSWER (Include additional pages if necessary. Total pages: 2)

The classical definition of "dedicated" is "*used only for one particular purpose [function]*".

- Dictionary.com – *set apart or reserved for a specific use or purpose*
- Merriam-webster.com – *used only for one particular purpose, given over to a particular purpose*

Using this literal interpretation, the words of Order element 1.26 means that all equipment associated with the HCVS should be permanently installed and only serve the HCVS function. This is inconsistent with other Order elements that permit shared component functions as discussed below:

- HCVS components may serve multiple functions described in the plant Current License Basis (CLB). Examples include:
 - ✓ Piping, valves and penetrations for both Drywell and Wetwell may be used for Drywell/Wetwell vent and purge prior to or following refueling outages or for pressure control during normal plant operation.
 - ✓ Containment Isolation valves in the HCVS system may provide a containment isolation function independent of the HCVS function.
 - ✓ Containment Isolation valve position indication for valves in the HCVS may be used for post-accident indications.
 - ✓ Instrumentation supporting HCVS and non HCVS functions.
- Some components in the HCVS system are powered electrically or pneumatically by non-dedicated sources to support non-HCVS functions as described in the plant CLB documents. Examples include:
 - ✓ Power to solenoids for Primary Containment Isolation valves.
 - ✓ Plant safety related air or nitrogen systems to operate isolation valves.
 - ✓ DC power from station batteries to instrumentation and indications for valves.

In summary, the correct interpretation of the word "dedicated" in the context of the HCVS order is essential for the proper implementation of the order.

The following components are examples of what does not have to be dedicated to the HCVS function and may be shared with other systems and support functions:

- Containment penetrations
- Containment isolation valves
- System boundary valves
- Piping
- Instrumentation
- Wiring, conduit and connection points used to service non-dedicated components

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While the above components need not be dedicated, they need to be available to support HCVS function when containment venting using the HCVS system is required. Compliance with NEI 13-02 guidance will ensure that this condition is met.

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

Revision: 0 Date: _____

E. NRC Review:

Not Necessary _____ Interpretation X _____ Agency Position _____
Explanation: _____

F. Industry Approval:

Documentation Method: _____ FAQ _____ Date: _____