

# Draft for Comment



## U.S. NUCLEAR REGULATORY COMMISSION DESIGN-SPECIFIC REVIEW STANDARD FOR NuScale SMR DESIGN

### 9.5.3 LIGHTING SYSTEMS

#### REVIEW RESPONSIBILITIES

**Primary** - Organization Responsible for Electrical Engineering

**Secondary** - None

#### I. AREAS OF REVIEW

The branch with primary review responsibility will review the normal and emergency or supplementary plant lighting systems, including reference information associated with that review.

The specific areas of review are as follows:

1. The capability of the normal lighting system(s) to provide adequate lighting during all plant operating conditions.
2. The capability of the emergency lighting system to provide adequate lighting during all plant operating conditions, including fire, transient and accident conditions.
3. The effect of the loss of all alternating current (AC) power (i.e., during a station blackout) on the emergency lighting system.
4. The failure analysis of normal and emergency lighting systems.
5. Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC). For design certification (DC) and combined license (COL) reviews, the staff reviews the applicant's proposed ITAAC associated with the structures, systems, and components (SSCs) related to this design-specific review standard (DSRS) section 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 after the rest of the application has been reviewed against acceptance criteria contained in this DSRS section. Furthermore, the staff reviews the ITAAC to ensure that all SSCs in this area of review are identified and addressed as appropriate in accordance with Standard Review Plan (SRP) Section 14.3.
6. COL Action Items and Certification Requirements and Restrictions. For a DC 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 DC, a COL applicant must address COL action items (referred to as "COL information items" in certain DCs) included in the referenced DC. Additionally, a COL applicant must address requirements and site-specific information included in the referenced DC.

## Review Interfaces

Other SRP sections interface with this section as follows:

1. The review for lighting requirements for fire protection is coordinated and performed by the branch that has primary review responsibility for SRP Section 9.5.1.1.
2. The review of the adequacy of lighting systems and their power supplies with respect to security and physical protection requirements is coordinated and performed by the staff that has primary review responsibility for SRP Section 13.6.
3. The review of the adequacy of control room lighting systems and features related to their effectiveness to support reliable human performance, including evaluation with respect to the criteria specified in NUREG-0800 (Reference 1), is performed by the staff that has primary review responsibility for SRP Section 18.0.

Specific acceptance criteria and review procedures are contained in the referenced SRP sections.

## II. ACCEPTANCE CRITERIA

### Requirements

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

1. There are no general design criteria (GDC) or other requirements that directly apply to the normal and emergency or supplementary plant lighting systems.
2. Title 10 of the *Code of Federal Regulations* (CFR), Section 52.47(b)(1), which requires that a DC application contain the proposed ITAAC 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 operate in conformity with the DC, the provisions of the Atomic Energy Act (AEA), and the U.S. Nuclear Regulatory Commission's (NRC's) regulations.
3. 10 CFR 52.80(a), which 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 operate in conformity with the COL, the provisions of the AEA, and the NRC's regulations.

### DSRS Acceptance Criteria

Specific DSRS acceptance criteria acceptable to meet the relevant requirements of the NRC's regulations identified above are set forth below. The DSRS is not a substitute for the NRC's regulations, and compliance with it is not required. As an alternative, and as described in more detail below, an applicant may identify the differences between a DSRS section and the design features (DC and COL applications only), analytical techniques, and procedural measures proposed in an application and discuss how the proposed alternative provides an acceptable method of complying with the NRC regulations that underlie the DSRS acceptance criteria.

Acceptance criteria of the design of the normal and emergency lighting systems, as described in the applicant's safety analysis report (SAR), is based in part on the degree of similarity of the systems design with those for previously reviewed plants with satisfactory operating experience.

1. The normal lighting system(s) is acceptable if the integrated design of the system(s) will provide adequate station lighting in all areas, from power sources described in DSRS Sections 8.3.1, "AC Power Systems (Onsite)," (Reference 4) and 8.3.2, "DC Power Systems (Onsite)," (Reference 7) that are required for control and maintenance of equipment and plant access routes during normal plant operations. DC Power Systems (Onsite) may not be applicable to the normal lighting system for the NuScale design.
2. The emergency lighting system(s) is acceptable if the integrated design of the system(s) will provide adequate emergency station lighting in all areas, required for fire fighting, control and maintenance of equipment from power sources described in DSRS Sections 8.3.1, "AC Power Systems (Onsite)," and 8.3.2, "DC Power Systems (Onsite)," (References 4 and 7) for implementing safe-shutdown of the plant during all plant operating conditions, and the access routes to and from these areas.
3. The lighting systems designs will be acceptable if they conform to the lighting levels recommended in NUREG-0700, which is based on the Illuminating Engineering Society of North America (IESNA) Lighting Handbook (Reference 5), as related to systems design and illumination levels recommended for industrial facilities.

### III. REVIEW PROCEDURES

The reviewer will select material from the procedures described below, as may be appropriate for a particular case.

These review procedures are based on the identified DSRS acceptance criteria. For deviations from these acceptance criteria, the staff should review the applicant's evaluation of how the proposed alternatives provide an acceptable method of complying with the relevant NRC requirements identified in Subsection II.

1. Selected Programs and Guidance - In accordance with the guidance in NUREG-0800, "Introduction - Part 2: Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: Integral Pressurized Water Reactor Edition" (NUREG-0800 Intro Part 2) as applied to this DSRS Section, the staff will review the information proposed by the applicant to evaluate whether it meets the acceptance criteria described in Subsection II of this DSRS. As noted in NUREG-0800 Intro Part 2, the NRC requirements that must be met by an SSC do not change under the SMR framework. Using the graded approach described in NUREG-0800 Intro Part 2, the NRC staff may determine that, for certain structures, systems, and components (SSCs), the applicant's basis for compliance with other selected NRC requirements may help demonstrate satisfaction of the applicable acceptance criteria for that SSC in lieu of detailed independent analyses. The design-basis capabilities of specific SSCs would be verified where applicable as part of completion of the applicable ITAAC. The use of the selected programs to augment or replace traditional review procedures is described in Figure 1 of NUREG-0800, Introduction - Part 2. Examples of such programs that may be relevant to the graded approach for these SSCs include:

- 10 CFR Part 50, Appendix A, General Design Criteria (GDC), Overall Requirements, Criteria 1 through 5
- 10 CFR Part 50, Appendix B, Quality Assurance (QA) Program
- 10 CFR 50.49, Environmental Qualification of Electrical Equipment (EQ) Program
- 10 CFR 50.55a, Code Design, Inservice Inspection and Inservice Testing (ISI/IST) Programs
- 10 CFR 50.65, Maintenance Rule requirements
- Reliability Assurance Program (RAP)
- 10 CFR 50.36, Technical Specifications
- Availability Controls for SSCs Subject to Regulatory Treatment of Non-Safety Systems (RTNSS)
- Initial Test Program (ITP)
- Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC)

This list of examples is not intended to be all-inclusive. It is the responsibility of the technical reviewers to determine whether the information in the application, including the degree to which the applicant seeks to rely on such selected programs and guidance, demonstrates that all acceptance criteria have been met to support the safety finding for a particular SSC.

2. In accordance with 10 CFR 52.47(a)(8),(21), and (22), and 10 CFR 52.79(a)(17), (20) and (37), for design certification or combined license applications submitted under Part 52, the applicant is required to (1) address the proposed technical resolution of unresolved safety issues and medium- and high-priority generic safety issues which are identified in the version of NUREG-0933 current on the date up to 6 months before the docket date of the application and which are technically relevant to the design; (2) demonstrate how the operating experience insights have been incorporated into the plant design; and, (3) provide information necessary to demonstrate compliance with any technically relevant portions of the Three Mile Island requirements set forth in 10 CFR 50.34(f), except paragraphs (f)(1)(xii), (f)(2)(ix), and (f)(3)(v) for a DC application, and except paragraphs (f)(1)(xii), (f)(2)(ix), (f)(2)(xxv), and (f)(3)(v) for a COL application. These cross-cutting review areas should be addressed by the reviewer for each technical subsection and relevant conclusions documented in the corresponding safety evaluation report (SER) section.
3. The information provided in the SAR pertaining to the designs of the normal and emergency lighting systems including failure analysis is evaluated to determine that the lighting in all plant areas and access routes to and from these areas is adequate. The reviewer should verify that the lighting systems include isolation devices to separate between lighting circuits and Class 1E circuits based on Regulatory Guidance (RG)1.75 (Reference 6).
4. For review of a DC application, the reviewer should follow the above procedures to verify that the design, including interface and site-specific requirements set forth in the final safety analysis report (FSAR) meet the acceptance criteria. DCs have referred to the FSAR as the design control document (DCD). 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 DC FSAR.

For review of a COL application, the scope of the review is dependent on whether the COL applicant references a DC, an early site permit (ESP) or other NRC approvals (e.g., manufacturing license, site suitability report or topical report).

For review of both DC and 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 that the applicant has provided sufficient information and that the review and calculations (if applicable) support conclusions of the following type to be included in the staff's safety evaluation report (SER). The reviewer also states the bases for those conclusions.

The normal and emergency lighting systems include all components necessary to provide adequate lighting during normal and emergency plant operating conditions. The scope of review of the lighting systems provided for the plant included assessment of the systems designs, adequacy of the normal and emergency power sources, and verification of adequate lighting during fire, transient, and accident conditions.

When the applicant is following specific NRC guidance, the basis for acceptance of the normal and emergency lighting systems was conformance of the design, design criteria, and design bases to staff positions and industry standards and the ability of the emergency lighting system to provide adequate station lighting in all vital areas from onsite power sources during the full spectrum of accident and/or transient conditions and to the access routes to and from these areas.

The staff concludes that the design of the lighting system conforms to the applicable staff positions and industry standards and is therefore acceptable.

For DC and COL reviews, the findings will also summarize the staff's evaluation of interface and site-specific requirements, and COL action items relevant to this DSRS 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 acceptance criteria, as applicable.

#### V. IMPLEMENTATION

The regulations in 10 CFR 52.17(a)(1)(xii), 10 CFR 52.47(a)(9), and 10 CFR 52.79(a)(41) establish requirements for applications for ESPs, DCs, and COLs, respectively. These regulations require the application to include an evaluation of the site (ESP), standard plant design (DC), or facility (COL) against the Standard Review Plan (SRP) revision in effect six months before the docket date of the application. While the SRP provides generic guidance, the staff developed the SRP guidance based on the staff's experience in reviewing applications for construction permits and operating licenses for large light-water nuclear power reactors. The proposed small modular reactor (SMR) designs, however, differ significantly from large light-water nuclear reactor power plant designs.

In view of the differences between the designs of SMRs and the designs of large light-water power reactors, the Commission issued SRM- COMGBJ-10-0004/COMGEA-10-0001, "Use of Risk Insights to Enhance the Safety Focus of Small Modular Reactor Reviews," dated August 31, 2010 (ML102510405) (SRM). In the SRM, the Commission directed the staff to develop risk-informed licensing review plans for each of the SMR design reviews, including plans for the

associated pre-application activities. Accordingly, the staff has developed the content of the DSRS as an alternative method for the evaluation of a NuScale-specific application submitted pursuant to 10 CFR Part 52, and the staff has determined that each application may address the DSRS in lieu of addressing the SRP, with specified exceptions. These exceptions include particular review areas in which the DSRS directs reviewers to consult the SRP and others in which the SRP is used for the review. If an applicant chooses to address the DSRS, the application should identify and describe all differences between the design features (DC and COL applications only), analytical techniques, and procedural measures proposed in an application and the guidance of the applicable DSRS section (or SRP section as specified in the DSRS), and discuss how the proposed alternative provides an acceptable method of complying with the regulations that underlie the DSRS acceptance criteria.

The staff has accepted the content of the DSRS as an alternative method for evaluating whether an application complies with NRC regulations for NuScale SMR applications, provided that the application does not deviate significantly from the design and siting assumptions made by the NRC staff while preparing the DSRS. If the design or siting assumptions in a NuScale application deviate significantly from the design and siting assumptions the staff used in preparing the DSRS, the staff will use the more general guidance in the SRP as specified in 10 CFR 52.17(a)(1)(xii), 10 CFR 52.47(a)(9), or 10 CFR 52.79(a)(41), depending on the type of application. Alternatively, the staff may supplement the DSRS section by adding appropriate criteria in order to address new design or siting assumptions.

## VI. REFERENCES

1. 10 CFR Part 20, "Standards for Protection Against Radiation."
2. 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities."
3. 10 CFR Part 52, "Early Site Permits; Standard Design Certifications; and Combined Licenses for Nuclear Power Plants."
4. GDC 61, "Fuel Storage and Handling and Radioactivity Control."
5. GDC 19, "Control Room."
6. GDC 4, "Environmental and Dynamic Effects Design Bases."
7. RG 1.7, "Control of Combustible Gas Concentrations in Containment Following a Loss-of-Coolant Accident."
8. RG 1.112, "Calculations of Releases of Radioactive Materials in Gaseous and Liquid Effluents from Light-Water-Cooled Power Reactors."
9. RG 1.183, "Alternative Radiological Source Terms for Evaluating Design Basis Accidents at Nuclear Power Reactors."
10. ANSI/ANS Standard 18.1-1999, "Source Term Specification," American National Standards Institute/American Nuclear Society."
11. NUREG-0737, "Clarification of TMI Action Plan Requirements."

12. 40 CFR Part 190, "Environmental Radiation Protection Standards For Nuclear Power Operations."
13. RG 1.89, "Environmental Qualification of Certain Electric Equipment Important to Safety for Nuclear Power Plants."
14. RG 1.143, "Design Guidance for Radioactive Waste Management Systems, Structures, and Components Installed in Light-Water-Cooled Nuclear Power Plants."
15. RG 1.26, "Quality Group Classifications and Standards for Water-, Steam-, and Radioactive-Waste-Containing Components of Nuclear Power Plants."
16. RG 1.29, "Seismic Design Classification."
17. RG 1.117, "Tornado Design Classification."
18. RG 1.206, "Combined License Applications for Nuclear Power Plants (LWR Edition)."
19. EPRI, "Pressurized Water Reactor Primary Water Chemistry Guidelines."
20. EPRI, "Pressurized Water Reactor Primary Water Zinc Application Guidelines."
21. EPRI, "Advanced Light Water Reactor Utility Requirements Document, Volume III, ALWR Passive Plant."
22. NUREG-1242, "NRC Review of Electric Power Research Institute's Advanced Light Water Reactor Utility Requirements Document, Passive Plant Designs" Volume 3, Part 1 and Volume 3, Part 2 (ADAMS Accession Nos. ML070600372 and ML070600373).
23. EPRI, "Cobalt Reduction Guidelines."
24. RG 8.8, "Information Relevant to Assuring that Occupational Radiation Exposures at Nuclear Power Stations Will Be as Low as is Reasonably Achievable."